Procedures and Guidelines for Archaeological Survey and Inventory in Hawai‘i

- Site Identification, Documentation and Evaluation Standards
- Obtaining a State Inventory of Historic Places Site Number
- Field Forms and Procedures for Survey and Inventory
- Reporting and Review Standards
- Public Access to Information

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Cover Photos, clockwise from upper left:

Cut stone stairway constructed along the ocean cliff face at Hakalau Sugar Mill, Hakalau, Hawai‘i Island (photo by T. Donham)

*Strombus* shell remnants on deflated surface in the uplands of Kaho‘olawe (photo by J. Pickett)

Pī‘ilani/Hoapili Trail in the area of Keone‘oio, Maui (photo by J. Picket)

Perimeter wall, Kukuipuka Heiau, Maui (photo by J. Pickett)
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Acronyms

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<tr>
<td>ACHP</td>
<td>Advisory Council on Historic Preservation</td>
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<td>AIS</td>
<td>archaeological inventory survey</td>
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<td>APE</td>
<td>area of potential effects</td>
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<td>CFR</td>
<td>Code of Federal Regulations</td>
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<td>CLG</td>
<td>certified local government</td>
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<td>DOE</td>
<td>determination of eligibility</td>
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<td>GIS</td>
<td>geographic information system</td>
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<td>HAR</td>
<td>Hawaii Administrative Rules</td>
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<td>HPF</td>
<td>Historic Preservation Fund, administered by the National Park Service</td>
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<td>HRS</td>
<td>Hawaii Revised Statutes</td>
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<td>HRHP</td>
<td>Hawaii Register of Historic Places</td>
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<td>NHO</td>
<td>Native Hawaiian Organization(s)</td>
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<td>NHPA</td>
<td>National Historic Preservation Act</td>
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<td>NPS</td>
<td>National Park Service, Department of the Interior</td>
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<td>NRHP</td>
<td>National Register of Historic Places</td>
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<td>Office of Hawaiian Affairs</td>
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<td>SIHP</td>
<td>State Inventory of Historic Places</td>
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<td>SOI</td>
<td>Secretary of the Interior</td>
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<tr>
<td>TMK</td>
<td>Tax Map Key (property identification system in Hawaii)</td>
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Acknowledgement

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Washington, DC 20240

The activity that is the subject of this (type of publication) has been financed (in part/entirely) with Federal Funds from the National Park Service, U.S. Department of the Interior, and administered by the Hawaii Department of Land and Natural Resources (DLNR). However, the contents and opinions do not necessarily reflect the views or policies of the Department of the Interior or the DLNR.
1. Introduction

This document was prepared by the Hawai‘i State Historic Preservation Division (SHPD) for use by individuals, consulting firms and research teams who conduct archaeological field investigations within the State of Hawai‘i. The manual also defines procedures for SHPD staff archaeologists who conduct fieldwork, review submitted documents and maintain the state inventory databases and geographic information system (GIS). The manual is organized to provide overviews of the various steps identified for survey and inventory, with more detailed instructions and guidelines attached in the Appendix. This allows for easy identification of task-specific procedures as needed, while maintaining an organizational framework that is consistent with Federal standards and guidelines. The primary purpose of this manual, regardless of the audience, is to ensure that the findings of all surveys conducted in the State of Hawai‘i are incorporated into a statewide inventory of historic properties, to ensure that research results are collected in a manner that allows for integration into the SHPD preservation planning process, and to ensure public access to information that is not sensitive.

The survey process includes all actions related to the identification, documentation and evaluation of historic properties. The inventory process refers to those actions related to the documentation of the survey results and determinations. The desired result is a repository of information on specific properties that are evaluated as significant. Inventory often takes the form of record keeping, maintenance of appropriate databases, the geographic information system (GIS) and library resources, thus ensuring information is available to professional and public users.

The organization of the manual follows the general processes and principals of survey (Sections 2 through 4) and inventory (Sections 5 through 7) as sequential elements that result in a consistently maintained system. Concepts and practices described here are based on National Park Service guidelines as found in the Historic Preservation Fund (HPF) Grants Manual and the Secretary of the Interior’s (SOI) Standards.
2. Identification

Survey activities are intended to identify, document and evaluate historic properties. Survey includes the analysis of data necessary to identify and evaluate historic properties, determine where gaps exist in our understanding of historic properties. The context of a survey can vary considerably and will influence many elements, such as the geographic extent, the types of historic properties identified, the level of coverage, the extent of documentation, and the degree to which findings are evaluated for National Register of Historic Places (NRHP) eligibility. Regardless of the context, the identification process must follow standards that will allow for the dissemination of knowledge to the public and contribute to the overall goals of the state historic preservation program. These standards are codified in the Secretary of the Interior’s Standards and Guidelines for Identification (http://www.nps.gov/history/local-law/arch_stnds_2.htm). The three basic standards for identification are:

I. Identification of historic properties follow methods, techniques and level of detail necessary so that the gathered information will provide a sound basis for making decisions and achieve defined preservation goals.

II. Results of the identification process are reviewed and integrated into the preservation planning process.

III. The identification results and records are systematically gathered and maintained for accessibility, with the safeguarding of sensitive information.

The SHPD, in its capacity as the regulator of archaeological activities in Hawai‘i, pursuant to Section 101 (b) (3) of the National Historic Preservation Act (NHPA), is responsible for defining and implementing identification standards as they directly relate to archaeological surveys. §6E-3 (13) Hawaii Revised Stautes (HRS).

2.1 Purpose and Scope of the Survey

Archaeological surveys are conducted for a variety of reasons; they are often designed and implemented to address specific research questions that are developed by teams or individuals associated with universities, or funded through public or private grants. Surveys are conducted by SHPD staff for purposes of expanding or refining the SIHP, for purposes of nominating a significant historic property to the Hawaii Register of Historic Places (HRHP) and NRHP, or for purposes of identifying areas where historic properties are absent. Surveys are conducted by Certified Local Governments (CLGs) for a number of reasons, such as assisting in the development of a historic context for evaluating historic properties, redefining or updating existing historic district boundaries and contributing properties, or developing guidelines for local government permits within historic districts. Surveys are also conducted by professional consulting firms in response to a request by SHPD, a State or Federal agency, or a private landowner, in compliance with state or federal preservation laws.
The purpose of a survey will directly affect its scope; it is therefore very important to clearly state the purpose of a proposed survey work plan or of a completed survey for which a report is prepared and submitted to SHPD.

2.2 Research Design

The research design is developed prior to initiation of any fieldwork and after the purpose of the survey has been determined. This written document provides the link between identified research topics or historic contexts (See Section 4.1) and the selected archival, field and/or laboratory methods. In the context of Chapter 6E or Section 106 NHPA compliance contexts, the research design is a required component of the inventory survey plan, when requested as part of the review process. The Secretary of the Interior’s Standards recognize three general components of the research design: 1) objectives, 2) methods, and 3) expected results.

The objectives as stated in a research design should directly reflect the intended purpose of the survey, whether it is at the level of regional synthesis, thematic representation within a town, a historic corridor, or a small private parcel undergoing compliance review. Information that should be provided in this statement includes current knowledge about the research topic, historic context, or property type as compiled from background research or assessments of previous research. The objective statement should also include a clear and concise description of the survey area, and its relationship to prior survey areas or any area of potential effect (APE) associated with public or private development.

The methods component of a research design should explicitly define the boundaries of the survey area and state intended field and/or archival and laboratory research methods. This is particularly important if the research design is submitted in the context of an inventory survey plan for Chapter 6E or Section 106 compliance surveys. In many cases, methodological issues can affect the findings and conclusions of a survey; it is therefore critical that an accurate description of field methods be included. For surveys conducted pursuant to Chapter 6E, the expectation is that 100% of the surface area of a defined APE will be visually inspected (HAR §13-276-4). The investigator should determine whether or not the entire surface of an APE can feasibly be inspected prior to initiation of fieldwork. If conditions (such as development, topography or vegetation) preclude a 100% visual inspection, the survey sampling design must be developed in consultation with SHPD and is subject to approval prior to inclusion in the research design. The methods sections should include a discussion of how spatial data will be collected in the field in a manner compatible with the SHPD GIS data collection standards. The boundaries of the survey area as well as point, lines or polygons for identified cultural resources will need to be transmitted to SHPD along with appropriate metadata in a geodatabase format (see Section 5 below).

Expected findings are predictions based on the synthesis of previous archaeological work in the area, archival research and information on the current condition/uses of a survey area. These are often stated
as working hypotheses to be tested during the course of the survey. For example, one might conclude that based on current information, a certain type of archaeological site would be absent or very rare within a given survey area. The actual findings could prove the assumption erroneous, thereby increasing our knowledge regarding the distribution of a certain site type and the expectations of a certain environmental setting or land use pattern. When the background research for a survey duplicates or repeats previous work, predictions are usually self-fulfilling and the full research value of archaeological resources is not recognized. A true research design builds on existing knowledge to extract new information about a place and its history, rather than simply repeat known information.

2.3 Background Research

Background research is an important identification tool that is either a stand-alone method or is used in conjunction with field work. When used in conjunction with field work, the background research should always occur first, so that the information obtained can inform the observations made in the field. Preliminary background research is needed in order to complete the research design for a survey project. Additional research is conducted in accordance with the goals established in the research design. These goals may include directed research about a particular site type or geographic area that would constitute new information to be synthesized in conjunction with the field work findings.

The Secretary of the Interior’s Standards for Historical Documentation contain a number of important factors that should be considered when doing background research for survey field work. Regarding the use of sources, the Standards note that the research design should state the kinds of source materials that will most likely contain the information needed. If it is determined that local newspapers and tax records will provide the most relevant information on former land uses of a survey area, then this component should be the focus of background research. In Hawaii, the most commonly used archival source materials include oral histories as recorded by various scholars, Māhele records including Native and foreign testimonies, boundary testimonies and other Land Commission records and claims; 19th century Hawaiian language newspapers, historic government survey maps, insurance maps, tax maps; church records; and historical narratives from travelers or residents. These sources can be found at the public and university libraries, the Hawai‘i State Archives, Bishop Museum Archives, on line databases developed by Waihona ‘Aina and the Office of Hawaiian Affairs, private museums (Mission Houses, Lyman Museum, Baily House Museum, train and plantation museums and corporate archives), Department of Defense records, and National Park records.

Surveys that are conducted as part of Chapter 6E compliance are required to conduct and report on background research of 18th and 19th century Hawaiian literature, mid-nineteenth century Land Commission awards (LCA), and post-1850 times as reflected in literature or oral history [HAR §13-276-5 (b)]. If LCA were granted within or near a survey area, specific information about the award, as documented in the Land Commission records, is required to be reported. This information has the
potential to provide critical interpretive value that would otherwise not be visible in the archaeological record. The extent to which Land Commission records are integrated into a research design varies, depending on the presence of (LCA) and the quality of available records.

Background research also includes an examination of archaeological reports, previously identified site records, and a compilation of previously surveyed areas within or near the proposed survey area. This research must be completed prior to the initiation of fieldwork in order to determine whether there are known historic properties within the survey area, and the extent of prior research/evaluation work that has been completed [HAR §13-276-5 (b)]. There are a variety of sources for information on previous archaeological work in Hawai‘i. Many reports on the surveys conducted in the early to middle twentieth century were published by Bishop Museum and are available in public libraries as well as on line and at the local SHPD libraries. Reports generated in research and compliance contexts since the inception of SHPD are shelved at SHPD libraries. There are various paper forms of maps generated by SHPD in cooperation with other State agencies, available at SHPD offices, as well as site records, database information and GIS information. These resources are currently not available on line; researchers must visit the appropriate office (Wailuku, Hilo or Kapolei) to view the information. Copies of reports are available for short term checkout and copying.

2.4 Informant Interviews

Individuals with knowledge about historic properties in a survey area should be identified and consulted prior to the initiation of field work activities. This is particularly important for research projects or compliance projects that cover large areas, or are located in regions known to contain culturally significant resources. The initiation of consultation will also determine the need or appropriateness of an ethnographic survey in conjunction with the archaeological survey. It is mandatory for the lead federal agency to initiate efforts to identify persons and Native Hawaiian organizations knowledgeable about an undertaking’s area of potential effect (APE) in order to inform identification and evaluation efforts (36 CFR Part 800.4). Chapter 6E compliance surveys require consultation with individuals or organizations associated with an ethnic group that may place traditional cultural value on resources or places located within the survey area [HAR §13-275-6 (c) and §13-284-6 (c)]. This consultation is not specifically required prior to the initiation of field work, but it must be completed and included in the report of findings and significance evaluations [§13-276-5 (g)]. SHPD urges all persons and firms conducting surveys in Hawai‘i to become familiar with members of the descendant community associated with a survey area and invite them to be active participants in the process. People are generally more willing to share information about storied places if they are respected and their opinions are seriously considered when decisions are made regarding historic properties.

There are many Native Hawaiian organizations (NHO), commissions and non-profits who have special interest in given areas, based on traditional knowledge passed down through family and community
members. Examples include the Island Burial Councils, comprising members with regional knowledge within the five Councils (Kaua‘i/Ni‘ihau, Oahu, Moloka‘i, Maui/Lana‘i and Hawai‘i), Hui Malama I Na Kupuna O Hawai‘i Nei, regional representatives of the Office of Hawaiian Affairs, members of the Royal Order of Kamehameha and the Hawaiian Civic Clubs, Aha Moku members, church groups, the Native Hawaiian Legal Corporation, and the Native Hawaiian Organization Association, who can provide consultation lists for identified areas.

The US Department of the Interior Office of Native Hawaiian Relations maintains a notification list of over 70 organizations in Hawai‘i that wish to be consulted regarding the identification and evaluation of historic properties within defined geographic areas of island, moku and ahupua‘a. The list is available at [www.doi.gov/ohr/nativehawaiians](http://www.doi.gov/ohr/nativehawaiians).

### 2.5 Field Survey

The field work component of a survey is generally defined according to the level of coverage within a given area and according to the level of work conducted at each of the identified cultural resources. Field inspections are generally not defined as surveys; however, when the level of pedestrian coverage is equal to an intensive survey, the information obtained may be used to update the SHPD survey feature class in the GIS. SHPD may conduct field inspections to establish the presence or absence of cultural resources within a project APE that is under Chapter 6E or Section 106 compliance review. If any cultural resources are observed, the inspection ends and a formal inventory/intensive survey of the APE is recommended. If no cultural resources are observed, the inspection continues to ensure that 100% of the project APE is examined. In these cases, the negative findings of the inspection are documented and entered into the survey area geodatabase as a surface survey area with no resources. The field inspection field forms are further discussed in the next section and the field form is shown in Appendix A. The geodatabase procedures are described in Section 5.2 below.

Field inspections are also conducted by consulting firms in conjunction with literature searches, to establish the probability of cultural resources being present or absent within a project APE. These are often submitted to SHPD in accordance with HAR §13-275 or §13-284, as supporting documentation for an agency determination that no historic properties will be affected by a proposed project. Preferably, these types of studies should be conducted as reconnaissance level surveys. It is the responsibility of SHPD to determine whether the field inspection and literature review provides sufficient information to support the determination that no historic properties are present. If questionable, additional field work by SHPD staff or the project proponent will be conducted to verify the absence of cultural resources. No site documentation work is conducted as part of a compliance field inspection. In all cases, if cultural resources are found, an inventory/intensive survey is triggered. Field inspections are generally not conducted as part of research projects; in these situations, reconnaissance survey is conducted to establish the presence/absence or likelihood of cultural resources within a project area.
Reconnaissance surveys are appropriate when the goals of the project are general in nature, such as gaining an overview of the types and distribution of historic properties most common within a defined area, or when the presence/absence of cultural resources is needed for land use planning purposes. Information collected for identified sites is usually broad in nature and not always sufficient to establish the specific age and function (or significance) of each identified site. Subsurface testing is usually not included in the scope of reconnaissance surveys. A research design is expected to be developed in connection with reconnaissance surveys, along with documentation of 1) the kinds of historic properties looked for, 2) the boundaries of the survey area, 3) the methods used and extent of survey coverage, 4) description of the kinds and numbers of historic properties observed and other descriptive information as determined by the research design, and 5) identification of areas that contain no cultural resources (Secretary of the Interior’s Standards for Identification). Reconnaissance surveys are appropriate for Chapter 6E and Section 106 compliance if and when no cultural resources are identified within a defined APE, with the understanding that the survey coverage is adequate. For 6E projects, the current HAR identifies assessment surveys as those with no findings. Current HAR allows the assessment survey report to be submitted to SHPD with no background information or research design (HAR §13-275-5 or §13-284-5); however, it is preferable that this type of survey be conducted in accordance with the Secretary of Interior’s Standards. It is difficult to determine the presence or absence of potentially significant places within an APE when no background information is collected and no consultation has occurred.

Intensive surveys are appropriate when it is important to know where all historic properties are located within a project area; and when it is necessary to evaluate these properties so that appropriate treatment can be determined for each site. Chapter 6E compliance surveys must be intensive when potentially significant historic properties are present within a project APE. This type of survey is identified as an inventory survey in the HARs pertaining to the identification and evaluation process (§13-275, -276 and -284). Intensive surveys conducted in compliance with Section 106 must document the first three sets of information identified for reconnaissance surveys (above), as well as the following: 4) a record of the precise location of all properties identified; and 5) information on the appearance, significance, integrity and boundaries of each property to permit an evaluation of its significance (Secretary of the Interior’s Standards for Identification). This information is also required for intensive/inventory survey reports prepared in compliance with Chapter 6E. In addition to the above, Chapter 6E reports must include descriptive information on subsurface deposits and recovered materials, drafted scaled plan maps of each property, representative photographs of each property, an assessment of site age and function, description and documentation of previous land disturbances within the project area, a summary discussion of the functional types identified (with distribution maps and tables), and a re-evaluation of ideas on the history of land use in the ahupua’a and survey area (§13-276-5). A more detailed discussion of information required to be presented in Chapter 6E intensive survey reports is found in Section 6.1 and Appendix E.
Parties conducting reconnaissance and intensive surveys in Hawaii are required to provide GIS data to SHPD regarding the survey area and all identified historic properties (and features). Geodatabase templates and data dictionaries are available from SHPD; this process and the required information sets are discussed in detail below (Section 5.2).

SHPD issues annual permits to archaeologists qualified pursuant to the Secretary of the Interior’s Standards and pursuant to HAR §13-281. An annual permit is required before any archaeological historic property can be modified in any way. Persons holding annual permits (principal investigators) are required to submit brief reports of findings within one month after any field work is completed. Permit holders are encouraged to notify SHPD upon initiation and upon completion of any field work, whether for research or compliance purposes.

2.6 Underwater Survey and Submerged Resources

The channels between the main islands and waters within three miles of all shorelines are under State jurisdiction. All submerged historic properties under waters controlled by the State are considered property of the State. SHPD recommends that underwater surveys be conducted prior to any project (private or public) that has the potential to affect submerged resources. An underwater reconnaissance can be conducted using divers if conditions permit; otherwise, remote sensing should be employed. Areas that are not amenable to diver surveys include bays or estuaries that have high sedimentation rates; submerged resources in these environments would most likely be buried and not visible to divers. Areas generally deeper than 100 feet pose threats to diver safety due to the bottom time needed to conduct a systematic survey.

Marine remote sensing survey should employ dual instrumentation that will detect both buried and exposed cultural resources. Under normal conditions, shipboard equipment should include a positioning system, a depth recorder, and a marine magnetometer or side-scan sonar. A shallow seismic (sub-bottom) profiler may be needed where deep deposits of sand or other overburden are present. Initial survey transects for underwater surveys should be spaced no greater than 50 meters for magnetometer survey and no greater than 150 meters for side-scan sonar survey. When anomalies are detected, delineation transects should be 15 meters or less, depending on anomaly size and duration.

Exposed underwater resources located by remote sensing should be ground-truthed by visual inspection if safety and visibility conditions permit. Sub-bottom anomalies should be ground-truthed by manual or hydraulic probing or test excavation using induction dredge, airlift or water jet, as appropriate to bottom conditions. Ground-truthing should include documentation by measured sketches, verbal descriptions and photography or video if feasible.

Near-shore waters around the Hawaiian islands have a high potential to contain submerged cultural resources, due to subsidence, shoreline erosion and rising sea levels. Examples of threatened resources
include petroglyphs, papamū, salt pans and bait cups, remnants of structural features that were once on the shoreline, fishpond and fish trap walls, and human skeletal remains (both in situ and disturbed). Satellite and lidar imagery can be very productive in identifying structural remains in these environments. On-site documentation of these types of sites can be potentially unsafe and must be coordinated with local tide and surge conditions. These resources are too shallow for standard underwater techniques and require adaptive use of both land and water-based equipment. For example, positioning data can be collected using GPS equipment from a kayak, or a shore-based total-station or transit with a snorkel crew.

Other types of submerged sites found in waters immediately offshore include fishing ko’a (stone structures), concentrations of palu stones (bait weights), octopus lure weights and net weights. These items tend to concentrate due to repeated use of productive fishing locations (i.e., around pinnacles) and due to the prevailing underwater currents that move portable items into localized concentrations over time. These traditional sites can be overlooked if remote sensing equipment is not properly adjusted, or if divers are not familiar with the appearance of coral encrusted stone artifacts.

3. Documentation

The recordation of findings during a field survey is the beginning of a very important sequence of documentation, which ends with the completion of a report and entry of all pertinent information in the appropriate databases and archival locations. Archaeological documentation, as defined in the Secretary of the Interior’s Standards, refers to operations performed using archaeological techniques as a means to obtain and record evidence about past human activity. This section focuses on the archaeological documentation as defined by the Secretary of the Interior. Methods of data collection, laboratory analysis and curation of recovered materials is also discussed here. Other aspects of documentation are covered in subsequent sections.

The SHPD does not have rules that define minimal requirements for field records used by consulting firms and researchers in Hawaii, and the SHPD does not formally monitor field recordation practices. The discussion here provides minimal guidelines for the types of forms that should be in use and the conditions under which they should be used. Qualified principal investigators have a duty to monitor their staff to ensure accurate field documentation, and that forms are used to record the types of activities that are listed below.

3.1 Survey Field Records and Descriptive Information

The SHPD Archaeology Branch has developed a number of field record forms to ensure the consistent and accurate collection of information during field activities. In addition to the field inspections and surveys described above, SHPD archaeologists must occasionally engage in mitigation level
documentation. All of these types of field work require that specific sets of information be documented. The various types of field forms are discussed here and examples are provided in Appendix A.

The field inspection report ensures that sufficient information is recorded to determine whether a specific APE can be classified as having no historic properties present (Appendix A-1). Important data include total area of the APE, percentage of the APE inspected, visibility, and a description of the field activities. Other information, such as the background as to why the inspection occurred, caller, owner, TMK, date(s), staff involved, and findings must be filled out, along with recommendations, attached photos and GPS data if collected. The field inspection report becomes supporting documentation for a subsequent compliance review letter which will either recommend that an intensive survey be conducted, or that no historic properties will be affected by the project. The field inspection report is filed in two locations: 1) the correspondence TMK file used for review and compliance research (hard copy and DocuShare); and 2) the electronic “Field Inspection Reports” folder, located in the shared Archaeology Branch folder (T drive). Reports in this folder are reviewed by the Branch Chief to ensure that the inspections were thorough and constitute an accurate representation of the entire APE that was inspected. If approved as thorough, the electronic reports with negative findings are then marked for the GIS specialist who uses them to update survey areas with negative findings.

Site and feature records are used when SHPD archaeologists engage in reconnaissance or intensive field survey. The forms contain information needed to complete the SIHP site database for newly identified archaeological resources, or to update the database for previously identified resources (Appendix A-2). Descriptive information to be recorded at the time of discovery includes overall site dimensions, number of identified features, relative location of the features, location of GPS readings within or around the site, feature dimensions, portable materials and/or cultural deposits observed, construction materials and techniques for any surface architecture, setting and vegetation, functional interpretation, overall condition and appearance, informants or information regarding the site, miscellaneous comments, applicable significance criteria, attached photos, maps, or other records, dates of fieldwork, and recorder. The completed field forms are filed in the new or existing hard copy site file after the information has been transferred to the SIHP database and has been used to complete a report of findings, evaluation and significance determination for the site. This is considered base line data that directly contributes to the statewide inventory and provides sufficient information to conduct problem-oriented research directed toward data gaps, historic contexts, or important themes in Hawaiian archaeology. All SHPD archaeologists responsible for completing the field forms have sufficient experience in documentation to understand what information is required for the various items listed on the form.

Subsurface testing is normally conducted in the context of intensive survey; controlled excavation is conducted in the context of data recovery. SHPD archaeologists most frequently conduct controlled excavation in the context of emergency data recovery. In the context of intensive survey, testing is
conducted to verify the presence or absence of cultural deposits in areas that show no surface evidence of such, or in architectural features that provide no surface clues regarding age or function. Examples of the latter include terraces that could be the result of temporary habitation or agriculture. Testing can verify whether habitation-related portable remains are present or absent and may provide dating samples, diagnostic artifacts, or other materials to aid in evaluating significance.

Emergency data recovery is an on-going practice at several locations where severe shoreline erosion results in the exposure and loss of significant historic properties. At some locations, human burials, architectural features and intact subsurface features are exposed by waves; SHPD archaeologists monitor these locations and if necessary, conduct rescue excavations. This work follows standard archaeological field procedures and the Secretary of the Interior’s Standards for Documentation. Research questions addressed are derived from the historic contexts and establish a systematic framework for measuring and monitoring shoreline erosion, which has the potential to increase dramatically in the future. Historic contexts are discussed in detail in Section 4.1.

The stratigraphic record is used by SHPD archaeologists to record soil deposition observed in shovel tests, controlled excavation units, or along exposed soil cuts, cliff banks or beach fronts (Appendix A-3). These forms also accompany any profiles that are completed for inadvertent discoveries made during construction activities. These forms document the depth range of each observed soil layer, moist and dry soil color based on the Munsell color charts, texture, structure, consistence, roots and the boundary. Nomenclature used for these variables follows the USDA National Soil Survey Handbook. Specific directions for completing this form are found in the Soil Description Guide, which is formatted to print as a small booklet, to be inserted in a Munsell color chart (Appendix A-4).

When controlled excavation is conducted, excavation records are used (Appendix A-5). Each form contains a scaled grid for plotting soil zones and features at the base of each arbitrary level or natural layer encountered. The form documents all observations of the soil, portable materials, and changes observed; and it records photos, samples, screening, collections, mapped material and other information. Soil descriptions used on this form also follow the Soil Description Guide. Samples and any portable material collections are accessioned in the field using the accession record, which is site-specific, but can continue through time (Appendix A-6). Repeated visits are often made to the same site over a period of several years for emergency data recovery. The accession record helps to keep a running record of what has been collected and level of analysis completed to date. All stratigraphy, excavation and accession records are maintained in the respective site files. Copies of accession records are also stored with the collections to ensure their proper identification. Curation is discussed in the following section.

A significant portion of the emergency data recovery work conducted by SHPD archaeologists involves the documentation and recovery of naturally exposed and endangered human skeletal remains in shoreline settings. To ensure complete and appropriate documentation of these finds, a burial
The **description record** is used in the field, in addition to the relevant excavation or stratigraphy records (Appendix A-7). HAR §13-300-32 concerning human burials prohibits the photography and physical examination of human skeletal remains, unless necessary for the determination of ethnicity. It is therefore important to maintain a thorough record of the disposition of human remains before they are removed from in situ contexts. The burial record requires information on the placement, flexure of limbs, orientation, and direction facing. Associated features, such as an identified pit feature, artifacts, and organic materials are documented, as well as the recovery record of what was screened, observed and collected for reburial with the remains. A scaled plan view map and profile view map of the burial feature is also completed when conditions allow.

SHPD staff archaeologists are not authorized to recover human skeletal remains unless the situation has been reviewed by the SHPD burial specialist for the appropriate island, or by the History and Culture Branch chief. In some cases, consultation is needed with recognized lineal and cultural descendants before a decision is made to recover human remains. Regardless of the context of the inadvertent discovery, all archaeological work at burial sites must be reviewed and approved by the History and Culture Branch.

### 3.2 Material Collection, Laboratory Analysis and Curation

The SHPD does not require the collection of surface artifacts from archaeological sites during surveys, and recommends that they remain on site unless they are in danger of being disturbed, destroyed, or stolen. Unique or diagnostic surface artifacts should be photographed on site with a suitable scale, especially when their presence is an important to the interpretation of site age or function. If such artifacts are moved to safer locations on the site after documentation, the original and new locational information should be documented.

Portable remains removed from archaeological sites are considered the property of the land owner; however, permanent curation must be in conformance with HAR and federal curation standards, regardless of ownership. Any and all portable remains removed from an archaeological site must undergo descriptive analysis and tabulation, and the information must be presented in the report of findings. The reporting details are discussed in Section 6. The types of data recorded during the descriptive analysis may vary, depending on the research questions addressed and the type of materials collected. Regardless of the nature of laboratory analysis, a record of collected items must be completed in the field at the time of collection, and the provenience and context information must remain with the collected items. Minimal information to be recorded for each sample or item should be prepared in advance on collection forms to ensure consistency in recorded data.

**Laboratory analysis** for reconnaissance surveys is normally limited, due to very small or no surface collections. Inventory surveys conducted for Chapter 6E compliance normally include subsurface testing, which may or may not result in collections of artifacts, midden materials and samples for specialized
analysis such as dating or pollen analysis. The results of all laboratory analysis are required to be presented in Chapter 6E inventory survey reports. It is expected that recovered artifacts are properly cleaned and that photographs of representative items as well as unique and diagnostic items are presented (with a scale) in the report.

Recovered ecofacts or midden materials should be separated by general type, such as marine shell, mammal bone, bird bone, fish bone, nut shell, wood/plant charcoal, and so forth. When marine shells or faunal bones are relatively complete, it is recommended that genus or species level of analysis occur for survey collections; it is required for data recovery level collections. Frequencies for each analytic category should be obtained and tabulated for each collection provenience, including each level of a test unit excavation. Frequencies are presented as either weight (in grams), a count of every piece (NISP), a count of minimum number of individuals represented (MNI), or combinations of the above. Complete analysis includes all three of these frequency values.

When specialized analysis is conducted of a selected group of collected materials, it is expected that the complete specialist’s report will be attached to the survey or data recovery report, with the findings presented as appropriate in the body of the report. This applies to specialized analysis of faunal remains, pollen or phytolith analysis, and age determination analysis.

Curation of archaeological specimens and records is required when the information has been determined important to history and prehistory. The materials are curated for future use in research, interpretation, preservation, education and resource management activities. The Secretary of the Interior’s Standards for Archaeological Documentation define four requirements for satisfactory curation:

1. Curation facilities have adequate space, facilities and professional personnel;
2. Archaeological specimens are maintained so that their information values are not lost through deterioration, and records are maintained to a professional archival standard;
3. Curated collections are accessible to qualified researchers within a reasonable time of having been requested; and
4. Collections are available for interpretive purposes, subject to reasonable security precautions.

SHPD does not have a specific administrative rule to regulate curation activities in the State; however as a recipient of federal funding via the HPF, the division is required to implement the Secretary of the Interior’s Standards noted above as well as 36 CFR 79 – Curation of Federally-Owned and Administered Archaeological Collections. In order to be determined capable of long-term curation, a facility should maintain complete and accurate records; possess equipment and space to properly store, study and conserve the collection; maintain physically secure conditions for safety, intrusion detection and emergency response; have qualified museum professionals on staff; archive associated field records, site forms and final reports; conduct periodic inspections and inventories; and provide access for scientific, educational or religious uses (36 CFR §79.9(1) through (9).

HAR regarding archaeological inventory surveys (§13-276) and data collection (§13-278) state that collections of materials from public lands (other than human remains) “...shall be placed in an
acceptable archive to be designated by the SHPD.” The curation of collections from private lands “...shall be determined in consultation with the SHPD.” [§13-276-6(a); §13-278-5(a)]. As the regulator of archaeological activities throughout the State, SHPD is responsible for ensuring that archaeological collections are properly curated [Chapter 6E-3(13)]. All staff should be familiar with federal regulations regarding curation and ensure that survey reports fully disclose the location of collections.

4. Evaluation

Inventory survey reports prepared for Federal and Chapter 6E projects are required to include significance evaluations of all identified historic properties, presented in the context of the appropriate theme, geographic area and chronological period. The evaluations are presented as recommendations on the site forms and in the report, pending formal concurrence with the SHPD. Concurrence is formalized in writing, with specific statements indicating the recommended and accepted significance evaluation for each historic property, and acceptance of the site forms and report as final. In the context of federal projects, significance evaluation is sometimes presented as a recommendation, to be followed with the federal agency’s formal determination of eligibility (DOE) for each identified historic property. In some cases, the SHPD will issue concurrence with the recommended significance assessments as presented in survey reports, if so requested by the federal agency; and will provide formal concurrence with the DOE. The critical elements of significance evaluations are the context of the evaluation and the criteria by which significance is assessed. Each of these elements are discussed below.

4.1 Historic Contexts

Significance is a quality that must be framed within a context that provides a basis for understanding the meaning and relative importance of a given historic property. A context normally consists of three distinct attributes: a theme, a specified geographic area, and a specified period in time. A historic context is defined by the National Park Service as a broad pattern of historical development in a community or its region that may be represented by historic resources (Derry et al. 1988).

Some of the more common themes in Precontact Hawaiian archaeology include the Polynesian settlement of Hawai‘i, the development of the Hawaiian political structure and religion, Hawaiian agriculture, Hawaiian technology, and subsistence strategies. Each of these broad topics can be further divided into more focused themes, as indicated in Appendix B. The geographic extent of the broader themes can be statewide, or within more defined geographic regions, islands or moku. For example, the theme of Hawaiian agriculture can be subdivided into leeward or windward field systems, wet or dry systems, and variations based on geologic age or soil characteristics of the various islands. There has been extensive research in this theme and it is important that the context be adequately developed when agricultural fields or sites are being evaluated for significance. It is also important that the age of the agricultural sites being assessed has been established. For example, complex hillside terracing might
be highly significant in a Precontact context, but not particularly significant in the context of 20th century coffee farming where terracing was accomplished with machinery.

After a theme and its spatial and temporal parameters have been established, it is important to identify the types of historic properties expected to occur within a given research or project area that are related to the context. For example, property types associated with agriculture in wet environments would include lo’i or pondfields, ‘auwai, terrace systems and boundary walls, trails, field shelters, land clearing features, and so forth. The expected geographic range of these types of properties, and the expected condition and preservation of these properties must also be considered in the evaluation process. For example, if an intact upper valley lo’i kalo complex is identified, its evaluation would need to consider the likelihood or known presence of other similar complexes in similar settings.

4.2 National Register Criteria
The National Register of Historic Places is used by all Federal agencies and most states to establish the integrity and significance of identified archaeological resources. Federal projects that are subject to the NHPA Section 106 process are required to evaluate findings pursuant to National Register criteria. These criteria have been adopted for use in Hawai‘i, under the HAR §13-198, §13-275 and §13-284. The criteria focus on the historical, architectural, archaeological, engineering or cultural values of the identified resources. In depth discussions and guidelines for the application of National Register criteria are found in a number of NPS publications, such as National Register Bulletins 15, 16A, 16B, 22, 32, 36 and the Secretary of the Interior’s Standards for Evaluation (see References for weblinks to these publications).

To be considered significant, a site, district, building, structure or object must possess attributes of integrity. The seven National Register elements of integrity are defined for archaeological sites below:

1) Location - the place where the historic property was constructed or the place where the historic event took place.
2) Design – the combination of elements that create the form, plan, space, structure and style of the property.
3) Setting – the physical environment of the historic property; includes topographic features, open space, viewed space, landscape, vegetation and constructed features.
4) Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
5) Workmanship – the physical evidence of the labor and skill of a particular culture or people during any given period in history.
6) Feeling – a property’s expression of the aesthetic or historic sense of a particular period of time or place.
7) Association – the direct link between an important historic event or person and a historic property; or the direct link between data and important research questions. (Little et al. 2000)
Information regarding the physical integrity of the historic property (location, design, setting, materials) is obtained through survey of the resources, to document physical condition, observable characteristics and extent, and to obtain an accurate location. This information is used together with the background research and historic context to determine the more abstract elements of integrity, which is holistic quality that considers workmanship, feeling, and association as expressed by or through the historic property.

Once the integrity is characterized and found to have value, the property is assessed to determine if it meets one or more of the following criteria:

A. Associated with events that have made a significant contribution to the broad patterns of our history;
B. Associated with the lives of persons significant in our past;
C. Embodies the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or possess high artistic value; or represent a significant and distinguishable entity whose components may lack individual distinction; or
D. Has yielded, or may be likely to yield, information important in prehistory or history.

(National Register Bulletin 15 Part II)

It is important to consider the applicability of criteria other than D when evaluating archaeological resources (Little et al. 2000). The tendency is to assign an information value to the site and assume that other criteria are not demonstrable given the condition of the resource and lack of associated historic records. Many archaeological sites in Hawaii retain the seven attributes of integrity noted above, and can be associated with an event, events, or historical trend. The use of Criterion A is appropriate in these cases and requires the following information: 1) identify the event(s) with which the property is associated; 2) document the importance of the event(s) within the broad pattern of history; 3) demonstrate the strength of association between the property and the event or pattern or events; and 4) identify the attributes of integrity that conveys historical significance (i.e., well-preserved features, intra-site patterning, stratigraphic sequences that reflect patterns in stylistic change).

The steps involved in determining whether an archaeological site or district meets Criterion B are outlined in Boland 1989 and Little et al. 2000. In these cases, the site must be associated with an identified person or persons whose activities as an individual are demonstrably important within a local, state or national historic context. The site should be associated with the activities or events for which the person is recognized in oral or written histories as important, and should date to the period of the person’s significant accomplishments. The site should also possess sufficient integrity to retain essential physical features that were present during its association with the important person’s life; this usually implies excellent preservation of features and artifacts.
**Criterion C** distinguishes properties that are significant as representatives of human expressions of culture, technology, art or engineering. Archaeological features that exhibit characteristics distinctive of a type, period or method of construction are eligible under this criterion, as well as features that display a unique or extraordinary craftsmanship or artistic value in construction or design. The development of the historic context for this criterion should include a consideration of features common to the particular group or type of resources, the degree of known individual variation and the evolution of the feature class or type. Comparison with thematically-related properties is generally required when considering whether a particular site rises above the level of workmanship of similar properties. As with the above criteria, archaeological resources must meet the integrity requirement by being well-preserved and clearly illustrative of the design or construction style being represented. Properties that are important representatives of the aesthetic values of a cultural groups, such as petroglyphs, are generally eligible under Criterion C.

Most of the historic properties determined significant under **Criterion D** are archaeological sites and districts. It would appear that in many cases, archaeological sites by their nature are automatically put in the Criterion D category with no further consideration or justification. In reality, much of the footwork to establish significance under this criterion should be conducted as part of the background research and through the identification of the data sets or categories of information that are of value to the identified historic context or research framework. The specific research questions are stated in the evaluation process, in order to tie the framework to individual sites or features within sites. In this manner, the important information contained in the site is identified. It is critical that the full research potential of archaeological resources is considered; a too narrowly defined research design or historic context will fail to identify potentially important information. For example, small single component extraction sites may seem insignificant as stand-alone sites, but take on far more meaning when they are examined as part of a larger settlement and land use system. The statement of eligibility for Criterion D needs to make the connection between information that is important to understanding specific research questions or hypotheses as well as general cultural phenomena that transcend time and space.

**4.3 Hawai‘i Administrative Rules Criteria**

Inventory surveys conducted pursuant to Chapter 6E must use significance criteria established by the state as specified in HAR §13-275 for public projects and §13-284 for private projects. The criteria and integrity considerations listed in these two rules are identical and are based directly on the National Register Criteria and integrity requirements. The HAR Criteria also includes a fifth significance category, identified as Criterion “e”. The full text of the applicable HAR criteria follows:

> **Evaluation of significance.** (a) Once a historic property is identified, then an assessment of significance shall occur. The agency shall make this assessment or delegate this assessment, in
writing, to the SHPD. This information shall be submitted in the survey report, if historic properties were found through the survey.

(b) To be significant, a historic property shall possess integrity of location, design, setting, materials, workmanship, feeling, and association; and shall meet one or more of the following criterion:

(1) Criterion “a”. Be associated with events that have made an important contribution to the broad patterns of our history;

(2) Criterion “b”. Be associated with the lives of persons important in our past;

(3) Criterion “c”. Embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, or possess high artistic value;

(4) Criterion “d”. Have yielded, or is likely to yield, information important for research on prehistory or history; or

(5) Criterion “e”. Have an important value to the native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events or oral accounts – these associations being important to the group’s history and cultural identity (HAR 13-275-6 and HAR 13-284-6).

If historic properties determined as significant under Criterion “e” are identified in a project area and if they are of significance to Native Hawaiians, OHA must be consulted about project effects and mitigation.

A significant historic property as defined by HAR is equivalent to a property that is eligible for listing in the National Register, as defined by 36CFR 800. When projects are subject to both Chapter 6E and Section 106 review, the SHPD concurs with determinations of significance and determinations of eligibility. The terminology differs, however the outcome is the same, except when Criterion “e” is applicable. There is no federal eligibility criterion that is exactly equivalent to the HAR significance Criterion “e”, although many of these sites are considered traditional cultural properties (TCP) and eligible for inclusion in the National Register in accordance with NPS guidance (National Register Bulletin 38). Criterion “e” gets dropped by federal agencies when they are assessing project impacts pursuant to the 36 CFR Part 800. Archaeologists and project reviewers need to be aware of this disjuncture and ensure that the cultural value of a historic property is clearly reflected for federal projects. In nearly all cases, if a property is significant under HAR Criterion “e”, it will also be eligible under the National Register Criterion A, because it has cultural significance that relates directly to the history of a people, and their cultural ties to a specific place or activity. Therefore, when Criterion “e” is used from the Chapter 6E perspective, it is advisable to include National Register Criterion A from the Section 106 perspective, especially if there is a potential that federal funding may be sought for a project after the Chapter 6E review process has ended.
5. Integration into the Statewide Inventory

The SHPD maintains an inventory of all historic properties that have been determined eligible for listing in the State and National Registers of Historic Places and/or determined significant pursuant to HAR. The inventory includes properties that have been listed on the State and National Registers, as well as properties determined significant and subsequently destroyed after mitigation was agreed upon and implemented. The inventory is tracked via site numbers that are assigned by SHPD upon request, when sufficient information is submitted to determine significance or eligibility. To date, approximately 52,475 SIHP numbers have been assigned to historic properties in Hawai‘i. Approximately 14,577 of these assigned numbers are represented by an entry in the SIHP database (28%). The remaining records are considered legacy data that are in need of updating and data entry.

The bulk of new entries in the SIHP are requests submitted by private consulting firms in connection with Chapter 6E or Section 106 projects. Additional new entries are made by SHPD staff in connection with field inspections, emergency or inadvertent discoveries, and context studies. National Park Service archaeologists also request numbers in connection with Section 110 studies; and researchers request numbers when new resources are discovered. The process for obtaining a site number is the same for all parties, regardless of the situation. Pursuant to HAR §13-276 -5(d), all archaeological reports submitted under Chapter 6E review are required to include SIHP numbers for identified sites. The site numbers must therefore be requested prior to the submittal of a draft survey report. Although not specifically required under Federal law, the SHPD urges all federal agencies to obtain SIHP numbers prior to submittal of reports associated with Section 106 undertakings.

5.1 Obtaining State Inventory of Historic Places Site Numbers

The SHPD GIS specialist is responsible for assigning site numbers when requests are submitted and verified as complete. The submittal is considered complete when the following information is present:

1. Electronic site form (Access) and feature form completed for each identified feature (See Appendix C for site form instructions).
2. A geodatabase containing spatial data and descriptive metadata for each identified feature and for the survey area, following the format and specifications of the SHPD GIS program (See Appendix D for geodatabase instructions).

The processing of the site number request and entry of the information into the SIHP database follows the workflow as depicted on the following page. The information is transmitted from the source to the SHPD GIS specialist via email, and the numbers are transmitted back to the source via email. Internal movement of the site records and spatial data is via the protected State intranet system. In the future, this procedure will be conducted via a web-based information exchange. As noted in the workflow chart, the data are held in a pending folder until the report has been reviewed and information in the report is found to be consistent with the information submitted on the site forms.
Figure 1. SHPD Workflow for SIHP Site Number Requests

1. Firm submits Geodatabase/Access database to GIS Specialist via email

2. GIS Specialist performs initial QA/QC

3a. GIS Specialist sends site number to firm

3b. GIS Specialist places Geodatabase in a the Pending folder labelled by project number

4. Firm submits final report

5. Reviewer reviews report and assesses the site forms and Geodatabase

6a. If not good, send comments back to firm

6b. If good, confirm with GIS Specialist

7a. GIS Specialist imports data into main Geodatabase

7b. IT Manager loads data into site database
5.2 Report Submittal and Database Entry

Projects subject the Chapter 6E-8, 6E-42 and Section 106 require the submittal of an inventory survey report to the SHPD when historic properties are identified within the project APE. Discussion of the report content is found in the following section and Appendix E. This discussion focuses on the report submittal process and responsibilities of SHPD staff in connection with the review and processing of survey reports.

The SHPD is authorized to charge fees in order to partially defray the costs of administering Chapter 6E-3, 6E-8 and 6E-42 [§6E-3(15)]. Fees are established in HAR §13-275 and §13-284 for various types of archaeological reports and plans; these are payable at the time the document is submitted to the SHPD. If a Chapter 6E compliance report is submitted to SHPD without the appropriate payment, commencement of the review period is postponed until payment is received. All submittal fees are processed at the main SHPD office in Kapolei; neighbor island offices do not receive or process payments. The submitted report must also include an attached submittal form which provides basic information about the document. This form is available from the SHPD web site (http://dlnr.hawaii.gov/shpd/forms) and an example is found in Appendix F. The submittal form is designed to document payment receipt and to provide sufficient information for an initial entry into the SHPD Reports database. Information requested includes name(s) and contact information of submitting agency or consultant, bibliographic information (title, author, date), TMK, ahupua‘a, district, island, type of plan/report, survey area acreage, number of newly identified sites, newly assigned site numbers, and amount submitted as noted in the schedule (Appendix F).

Reports submitted in connection with Federal Section 106 projects are not subject to fee payment, unless the project is also subject to Chapter 6E jurisdiction. Report submittals for Federal projects are expected to include a cover letter with the following basic information: name, location and project identifying numbers, lead federal agency, contact person(s), description of the undertaking, applicable regulations that apply, and relevant factors that would assist in project review. A more detailed discussion of the cover letter for federal, CLG and research project reports is found in Section 6.

After the incoming report is assigned an intake log number, a new record is created in the SHPD report database, regardless of whether it was submitted for review or for information purposes. An accession number is assigned to the report at this time and the report is transmitted to the staff person responsible for conducting the review, if needed. If the report is for information only, the accession number is attached to the upper left hand corner of the front cover and the report is placed in the SHPD library. If the report is to undergo review, it is transmitted to the appropriate staff archaeologist (Figure 2). Data entry is normally completed by assistants, administrative staff or trained volunteers, and the review is completed by a staff archaeologist who is qualified under SOI standards. Detailed instructions for completing the SHPD report database record (Access) is found in Appendix G.
If the reviewer determines that revisions are needed to bring the report into compliance with the applicable standards, a letter is sent to the submitter with requests for revisions and the report is placed in a holding area as a draft. If after one year, no revised report is submitted to SHPD, the draft report will be shelved in the library as an unaccepted draft. Due to the number of reports that are not revised upon receipt of SHPD comments, it becomes necessary to make the information available to researchers. In these cases, the SHPD review letter is affixed to the inside back cover of the report, so that persons using the document are aware of our concerns regarding specific statements or information as presented.

The report database is structured to serve as a library tracking system as well as a data table that is linked to site records in the GIS. Its searchable tables allows researchers and consultants to locate reports by author, subject matter, location, activities conducted and specific sites described or discussed. The database also allows staff to track the status of the report in compliance contexts; reference numbers for correspondence accepting the report as final are entered at the time the formal review is completed.

When revised reports are submitted to SHPD (red arrows in Figure 2), a new submittal sheet is attached, indicating that it is a resubmittal. No fee is charged for resubmittals and only certain information needs to be completed on the form. If the revised draft is acceptable, SHPD issues a final acceptance letter, the report database entry is updated with the correspondence log information, the library accession number is affixed to the report cover and it is shelved in the appropriate TMK file in the library. If the accepted draft report is for a neighbor island project, the reviewing office retains the accepted draft report and the submitter is requested to send a hard copy of the report, marked “Final” to the central Kapolei library. When available, the assigned accession number is also transmitted in the acceptance letter so that it can be permanently affixed to the cover of the final report by the submitter.

Figure 2. Report Review, Database and Library Entry Workflow
6. Report of Findings

This section discusses the format and content of survey reports deemed acceptable to SHPD and the procedures for reviewing submitted reports. As noted in Section 2.1, surveys are conducted for a variety of purposes; regardless of the purpose, reports of findings must meet minimum standards in order to be accepted by SHPD for research and inventory development purposes.

6.1 Archaeological Survey Reports

The three most common types of reports for archaeological surveys in Hawaii are: a) literature review and field inspection, b) reconnaissance survey, and c) inventory (intensive) survey. All three types are used for research purposes and by Federal agencies for Section 106 compliance. The third type is required for Chapter 6E compliance when historic properties are present. Reports for all three types of surveys must be in accordance with the Secretary of the Interior’s Standards for Identification in order to be accepted by SHPD. Inventory survey reports must be in accordance with HAR §13-276-5 in order to be accepted by SHPD for Chapter 6E-8 and 6E-42 compliance, as articulated in HAR §13-275 and §13-284. The information summarized here is discussed in greater detail in Appendix E.

All reports and plans submitted to SHPD must be accompanied by a submittal form or cover letter that contains important information used to create a record in the report database (see Appendix F). There are two types of forms, one is used for reports that do not require payment of a submittal fee (Section 106 compliance, research) and one is used when payment is required (Chapter 6E compliance documents). The review period for these types of submittals does not commence until payment is received.

The content of survey reports is of course dictated by the nature of the work conducted and the findings. In general, submittals to SHPD must contain all elements required by the Secretary of the Interior’s Standards for Identification which identifies five components:

1. Objectives;
2. Area researched or surveyed;
3. Research design or statement of objectives;
4. Methods used, including the intensity of coverage;
5. Results: how the results met the objectives; result analysis, implications and recommendations; where the compiled information is located. If the survey includes evaluation, the identified properties should be evaluated for inclusion in appropriate inventories.

Reports submitted in connection with Chapter 6E compliance actions must contain the above information in addition to specific information as stipulated in HAR §13-276. This information is discussed in detail in Appendix E and is not repeated here.
6.2 Report Review Procedures

Survey reports submitted to SHPD are reviewed for accuracy, literacy and conformance with the appropriate standards, guidelines and rules. When reports prepared for Chapter 6E projects are submitted, notice of the submittal is posted on the SHPD website and when payment is received, a 30-day public comment period commences. If comments are received from members of the public, SHPD must take them into consideration as part of the report review process. Chapter 6E and Section 106 reports include the results of identification, evaluation and determination of effects, and mitigation commitments. Reviewers must therefore examine the thoroughness of the identification process (were all potential historic properties identified?), the validity of the evaluation process (did consultation occur as indicated?), and the nature of possible effects (is the scope of the proposed project clear?) before agreeing with proposed mitigation commitments.

The review response from SHPD for compliance reports is due within 30 days (Section 106) or 45 days (Chapter 6E) of report submittal and it must include clear statements as to whether or not SHPD concurs with each of the four elements of identification, evaluation, effect determination and mitigation commitments. If information is incomplete or lacking in the identification process, SHPD can concur with the evaluations of identified sites that will not be subjected to additional fieldwork; or SHPD can defer concurrence with evaluations until the additional requested fieldwork is completed. In the latter case, additional fieldwork may provide new information to modify the significance assessment of a previously identified historic property. SHPD cannot concur with determinations of effect or mitigation measures until the significance of each historic property has been agreed upon. Once agreement is reached on significance, SHPD shall enter the evaluations for each historic property in the SIHP database, or ensure that the evaluations entered in the SIHP database are correct [§13-275-6(d)(3) and §13-284-6(d)(4)].

SHPD reviews of survey reports must be in writing and follow the structure indicated for review letters, as found in Review and Compliance Procedures for Archaeology, Section 2.2. The written response is sent to the party indicated on the submittal form, and can be copied to the agency responsible for issuing a permit or conducting the proposed project/undertaking. If revisions are requested, the draft report is stored in a holding area until the revised submittal is received and accepted; it is then placed in the library after the report database is updated. The workflow process is shown above (Figure 2).

Specific review procedures for Section 106, Chapter 6E, Section 110 and research reports are found in Review and Compliance Procedures for Archaeology, along with checklists that have been designed to ensure that all elements as required by the applicable standards and regulations are present in the report.
7. Public Access to Information

It is noted in the Secretary of the Interior’s Standards for Identification is that information gathered during identification activities must be made available to those responsible for preservation planning, and sensitive information must be safeguarded from public distribution. It is necessary to protect information on the location of religious sites and properties whose integrity or cultural value might be damaged by widespread access. For these reasons, the entire SIHP archaeological site database is not readily accessible to the general public via the internet, and reports with site location information are maintained in SHPD offices where access is controlled by staff. The sequestering of information deemed sensitive from public access is mandated in HRS Chapter 6E-43.5(e), which states that “Department records relating to the location and description of historic sites, including burial sites, if deemed sensitive by the council or the Hawaii historic places review board, shall be confidential.” This section of the law is further clarified in HAR §13-300-4:

Records relating to the location and description of historic sites including burial sites, and human skeletal remains and any burial goods, deemed sensitive by the council or review board, shall be exempt from the public disclosure requirements of section 92F-12, HRS. Location records include information regarding the island, district, ahupua’a, tax map key, address or site map where a burial is identified. Description records include information describing burial site features, human skeletal remains including genealogical information, or burial goods.

7.1 Electronic Data

Inventory information is organized and maintained in electronic format through the GIS, databases and DocuShare. Some of this information has been linked to the SHPD website, including SHPD procedures, administrative rules, federal standards, the Hawaii and National Registers of Historic Places, lists of permitted researchers, all incoming submittals statewide, and weekly reports of all “no historic properties affected” determinations. SHPD does not currently maintain public portals to the SIHP database or the GIS, and it does not have an electronic library that is accessible to the public.

Researchers, Native Hawaiian organizations, landowners and community members who request access to information for a specified area can request SHPD staff to conduct searches at no charge. SHPD receives numerous phone calls from interested parties requesting information for specific land parcels, which is also provided at no charge.

Researchers are provided access to view and export GIS screen shots for areas being investigated upon request, and staff conduct SIHP database searches on request to provide information regarding known historic properties in survey areas. The DocuShare system contains both reports and correspondence organized by TMK. This source is currently accessible by staff who also run searches as requested. If an electronic copy of a report is available in DocuShare, staff are allowed to send a copy to the requestor, provided they are permitted to conduct archaeology in the state, or they are affiliated with an agency or organization that is working within the historic preservation review process. Summaries of the report database in spreadsheet format are distributed to researchers, agencies, community groups and
interested parties on request. These files provide the dates, titles and authors of studies conducted for TMK parcels, organized by TMK zones and islands. The spreadsheets also provide information as to the location of the document, since not all library items are present on the neighbor islands. The spreadsheets do not provide information on the findings of the reports, SIHP sites recorded for each report, or other potentially sensitive data that is found in the reports.

7.2 SHPD Libraries
There are currently three locations statewide where researchers can access paper copies of survey reports, mitigation plans and mitigation reports, as well as other documents pertaining to research or preservation planning. The main library in Kapolei houses all reports statewide; the Hilo and Wailuku libraries house reports only for Maui and Hawaii islands respectively. All reports in these libraries should have duplicate copies in Kapolei. The libraries are monitored by SHPD staff to ensure that visitors are either permitted archaeologists, or affiliated with an agency, NHO or community group that has valid motives. Visitors are allowed to bring portable scanners to copy relevant report information; or reports may be checked out for a 48 hour period. For check-outs, the borrower must complete a check out form which provides the report number, TMK, name, phone number and date borrowed. When the report is returned, the form is completed by adding the return date.
8. References

Boland, Beth Grosvenor

Derry, Anne, H. Ward Jandl, Caro D. Shull and Jan Thorman

Little, Barbara, Erika M. Seibert, Jan Townsend, John H. Sprinkle, Jr., and John Knoerl


The Secretary of the Interior’s Standards and Guidelines for Identification (http://www.nps.gov/history/local-law/arch_stnds_2.htm)

The Secretary of the Interior’s Standards and Guidelines for Evaluation (http://www.nps.gov/history/local-law/arch_stnds_3.htm)

The Secretary of the Interior’s Standards and Guidelines for Archaeological Documentation (http://www.nps.gov/history/local-law/arch_stnds_7.htm)