
APPENDIX M

**SUBSURFACE ARCHAEOLOGICAL SURVEY
COMMENTS**

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1. Comment: Thomas Dye-26 Mar 2007 letter -Section 2- General Comments. 2nd paragraph-

“The negative attitude toward excavation outside areas with surface architecture in this paragraph reflects a somewhat...It seems out of place in a document of this type and should either be deleted or rewritten so that it reflects a more objective stance.”

Response: The view expressed by this author is based on a review of a single archaeological survey report of Mākua Military Reservation (MMR), and therefore is made without knowledge of the context in which this survey was undertaken.

Contrary to the comments expressed by Dr. Dye, the Army’s archaeological survey as described in the 2007 archaeological report was performed consistent with both the Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation (Identification), as well as the Department of Defense Guidelines regarding Archaeological Inventory Survey Standards and Cost-estimation Guidelines. The Secretary of Interior’s guidelines provide, with respect to research design objectives, that research design is a vehicle for integrating the various activities performed during the identification process and for linking those activities directly to the goals and the historic contexts for which those goals were defined. Identification activities should be guided by the research designs and the results discussed in those terms. Note that the National Park Service’s Guidelines for Local Surveys (Revised 1985) Chapter II, Conducting Surveys, says that in developing a survey plan “[H]istorical research and survey work already done should be incorporated in the new project and complemented, not duplicated”

It is important to point out that this survey fits the purpose of a reconnaissance survey (documents the kinds of property looked for; the boundaries of the areas survey, the method of survey including the extent of coverage; kinds of historical properties present in the surveyed area; specific properties identified and categories, and places examined that did not contain cultural resources). A reconnaissance survey is used to gather data to refine a developed historic context-such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area., as opposed to an intensive survey that is used to know precisely what cultural resources exist in a given area and information on the appearance, significance, integrity and boundaries of each property sufficient to permit an evaluation of its significance. The 2001 SA does not say what level of survey has to occur. It leaves it to the Army’s discretion.

Here, because numerous archaeological surveys had been conducted at MMR in the past; there was a high level of soil disturbance in the area to be surveyed (extensive and widespread bulldozing during range construction); there were no surface indication of archaeological features in the area to be surveyed, and therefore there was a low probability of uncovering intact cultural deposits, the Army, consistent with the above identified standards, would not have completed sub-surface testing in the area in question but for an agreement to do so. The perceived “displeasure” was more a concern by the Army that invasive subsurface probing would be more destructive than the mortar and artillery rounds that are shot at MMR, which generally cause less damage than the subsurface surveys. The Army currently protects all identified sites within the CCAAC. Note that the National Park Service’s Guidelines for Local Surveys (Revised 1985) Chapter II, Conducting Surveys, directs that care be taken when

excavating so as not to disrupt the site. It states that the “purpose of the excavation during survey is to obtain enough information to allow the site’s significance to be evaluated, not to recover all the data it contains.”

In addition, the Army consulted via a letter dated November 17, 2005, with Mālama Mākua, the State Historic Preservation Office, State of Hawaii, and other interested parties about the methodology that the Army would implement to complete the subsurface surveys identified by the 2001 court order. At the time of the consultation letter, moreover, Mālama Mākua had access to funds to pay for technical assistants. Notwithstanding the Army’s consulting efforts and funds for technical assistants, only the State Historic Preservation Office submitted any comments on the Army’s methodology used for the 2007 survey report and they concurred with the methodology to be used. It is noteworthy that the 477 test probes examined in the 2007 report were all negative for cultural deposits and artifacts. The survey did result in the discovery of previously unrecorded surface features.

The claim that there is a “2006 draft statement that urged archaeologists to dig outside areas with surface architecture” prepared by “The Archaeological Working Group convened by the Department of the Land and Natural Resources” is incorrect. According to the Army’s Cultural Resources section, no such statement was ever agreed to and adopted by the Department of Land and Natural Resources. Nor was such draft statement circulated to archaeologists to use as a working model. Moreover, were such a statement adopted, to be consistent with the Secretary of Interior’s Standards and the DoD’s standards identified above, archaeologists are to take into consideration in designing a survey project the historical body of research of the area. It should be noted that the Army did do subsurface testing during the 2006 surveys that were in areas that did not contain surface indication of sites. Again, as noted previously, the areas that were surveyed in 2006 were locations of a high level of soil disturbance in the past and had been previously surveyed, and therefore were unlikely to yield archaeological features. With the body of knowledge that exists, the Army would not have completed subsurface testing of these areas but for the settlement agreement. It is noteworthy that the sub-surface testing in 2006, during which 477 test probes were executed, were all negative for cultural deposits and artifacts.

2. Comment: Thomas Dye-26 Mar 2007 letter-Section 3- Methods, 1st para., pages 2&3

“The methodology section is incomplete and one can’t make sense... This is not an acceptable situation in a report of this type.”

Response: The Army conducted its survey in accordance with both the Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation (Identification), as well as the Department of Defense Guidelines regarding Archaeological Inventory Survey Standards and Cost-estimation Guidelines. Because of the numerous surveys conducted in the past at MMR and because of the high level of soil disturbance, the Army – consistent with the Secretary of the Interior and DoD standards -- would not have completed sub-surface testing in these areas but for the settlement agreement. The results of the survey, moreover, supported this position when the 477 test probes revealed no subsurface archaeological features. The survey did result in the discovery of previously unrecorded surface features. As noted above, the National Park Service’s Guidelines for Local Surveys (Revised 1985) notes that in developing a survey plan

“[H]istorical research and survey work already done should be incorporated in the new project and complemented, not duplicated”

The intervals expressed by the commenter are unreasonable and are not consistent with the Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation or the Department of Defense Guidelines regarding Archaeological Inventory Survey Standards and Cost-estimation Guidelines. While it is axiomatic that a higher intensity survey will yield a larger number of sites, such a design is not appropriate in all instances. Indeed, the aforementioned guidelines make clear that a high intensity design was not appropriate at MMR. The design identified in the 2007 survey report was based in part on the body of archaeological knowledge regarding the area and past excavation activities, including a high level of soil disturbance. The commenter’s intervals clearly run afoul of the National Park Service’s Guidelines for Local Surveys (Revised 1985) referenced above, that directs that care be taken when excavating so as not to disrupt the site. It states that the “purpose of the excavation during survey is to obtain enough information to allow the site’s significance to be evaluated, not to recover all the data it contains.”

3. Comment: Thomas Dye-26 Mar 2007 letter-Section 3- Methods, 2nd para, page 3

“In the section on stratified sampling, the attributes...to the *a priori* likelihood of finding cultural deposits.”

Response: The Army identified the attributes used to stratify the survey area: the area had a high level of soil disturbance in the past, there were no surface indication of archaeological features in the area to be surveyed, and a low probability of uncovering intact cultural deposits. Prior to the survey, the Army did in fact rank Area 1, 2, and 3 in its November 17, 2005, letter describing its objectives and methodology as to the likelihood of finding cultural deposits.

4. Comment: Thomas Dye-26 Mar 2007 letter-Section 3- Methods, 3rd and 4th para., page 3.

“The section on stratified random sampling needs to indicate the area of each of Areas...Two excavations within terraces are described on page 19.”

Response: The Army developed the stratified sampling plan consistent with both the Secretary of the Interior’s Standards and Guidelines for Archaeological and Historic Preservation (Identification) and the Department of Defense Guidelines regarding Archaeological Inventory Survey Standards and Cost-estimation Guidelines. Moreover, as Area 2 was more likely to yield cultural deposits than Areas 1 and 3, the Army did in fact have the highest density of sampling units in Area 2. It is noteworthy that the 477 test probes examined contained no archaeological features. The remnant terrace features were discovered after the probes had been executed. See p. 19 of the report.

5. Comment: Thomas Dye-26 Mar 2007 letter-Section 4- Results, 1st paragraph, page 3

“The Results section indicates that about 20% of the planned excavations were not carried out due to a variety...affect the likelihood that sites of the type expected during the survey would be found?”

Response: The comments by this reviewer by his own admission were made based on the review of a single survey, and therefore lack a complete context in which to evaluate the 2007 survey report. As noted previously, however, the survey was designed and conducted in accordance with the Secretary of Interior’s standards, as well as guidelines for the Department of Defense. Given the number of previous surveys and the high level of disturbance due to bulldozing during construction on the range, among other factors identified in the 2007 report, to select another hole as a substitute would not necessarily be consistent with the random design, but would merely be adding more holes. The area of highest likelihood actually was sampled at the highest density.

6. Comment: Thomas Dye-26 Mar 2007 letter-Section 4- Results, 2nd para. page 3

“The potential problems introduced by the reduction of sampling effort, which was...for this project was not completed.”

Response: The comments are made without the benefit of knowledge of all the previous surveys, and therefore are not based in fact but on incorrect assumptions. The 200 samples taken by the road were undertaken because the land proposed for survey in Area 2 had not been cleared of surface UXO at the time the 200 probes were placed. Following clearance, the original sampling plan for area 2 was executed. See p. 3, section 1.1.

7. Comment: Thomas Dye-26 Mar 2007 letter-Section 4- Results, 3rd para. page 4

“ Presumably, excavation of 477 sampling units yielded quite a bit of Stratigraphic data. ...of the zones could then be described in detail.”

Response: Field notes from the report were completed and have been supplied both to the commenter and Mālama Mākua.

8. Comment: Thomas Dye-26 Mar 2007 letter-Section 4- Results, 4th para. page 4

“Excavation of shovel probe #212 in Area 2b yielded a stratigraphic section that appears, on its face...characteristics of the layer II deposit lead to conclusion that it is not cultural?”

Response: This comment does not take into account that this probe was described as erosional wash and not an “in-situ” deposit. There was no evidence of a traditional Hawaiian cultural deposit.

9. Comment: Thomas Dye-26 Mar 2007 letter-Section 5- Conclusions, page 4.

“Due to various deficiencies in the report...appears to have been excavated but not recognized.”

Response: The survey described in the 2007 report was consistent with the Secretary of Interior’s guidelines for archaeology, as well as the DoD guidelines. Moreover, SHPO and other consulting parties were consulted on the methodology prior to the execution of the surveys. Only the State Historic Preservation Office submitted any comments on the Army’s methodology used for the 2007 survey report and they concurred with the methodology to be used. Because of the numerous past archaeological surveys at MMR and the high level of soil disturbance, among other factors noted in the report, the design developed was appropriate. It is noteworthy that the 477 test probes examined in the 2007 report resulted in no findings of

archaeological features in themselves. The survey did result in the discovery of previously unrecorded surface features.

1. Comment: David Henkin-03 April 2007 letter –Draft Archaeological Subsurface Survey-
“The Army has failed to satisfy its legal obligations regarding ...cultural resources posed by the Army’s proposed undertaking.”

Response: The Army has met its responsibilities under the settlement agreements, the National Historic Preservation Act, and NEPA.