



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.
Washington, DC 20240

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JUN 18 2014

Mr. William Aila, Chairman
State of Hawaii Department of Land and Natural Resources
1151 Punchbowl Street, Room 130
Honolulu, Hawaii 96813

Dear Mr. Aila:

I am writing to acknowledge receipt of the Hawaii State Historic Preservation Division's (SHPD) Corrective Action Plan (2) Final Report, dated May 16, 2014. The National Park Service (NPS) has completed its review of the product. It is clear that the SHPD has achieved the majority of the mandates of the second Corrective Action Plan (CAP2), established for the SHPD by the NPS in May 2013. It is our understanding that the entire final report as submitted along with the NPS comments and attachments will be posted to the SHPD website in a timely manner to facilitate transparency and keep the preservation community, partners, stakeholders and the general public advised of the process and progress to date as well as the next steps.

We would like to commend especially the quality of the product and the progress made by the SHPD since your appointment of Alan Downer, Ph.D. as the SHPD Administrator. During his short tenure, the SHPD has made considerable progress in establishing a secure professional and administrative staff, and in putting in place a number of important Standard Operating Procedures critical to the SHPD's ability to carry out its responsibilities under the National Historic Preservation Act. The sections of the CAP2 Final Report prepared by the Archeology Branch, the Architecture Branch, and the GIS Program are comprehensive and well presented. We encourage you to continue to work to reclassify the SHPD professional staff positions as civil service positions rather than as "at will" positions on yearly contracts. This will provide a more permanent and stable staff that will lend increased credibility to the SHPD when making important decisions about the preservation of Hawaii's cultural resources.

While the SHPD has met most of the requirements outlined in the CAP2, there are two critical pieces that remain outstanding or only partially achieved. First, the required impartial audit of SHPD administrative operations has not yet been completed. We understand that a contract has been issued for the work and that the audit will be conducted in the coming months. We look forward to reviewing the final audit report when it is completed. Second, the development of an acceptable survey inventory database to house Hawaii's inventory of historic properties remains incomplete. The NPS reviewed the inventory database plan submitted with the final report and has a

number of concerns that need to be addressed and resolved before this requirement can be satisfactorily met. Our specific comments are enclosed with this letter. Given the important issues that the SHPD faces daily related to land use, development activities, and Federal agency undertakings, access to an operational inventory of historic properties is a critical need.

Upon receipt of the final audit report and an acceptable plan for the database to house Hawaii's State Inventory, the NPS will review the SHPD's status as a high-risk grantee. Until that time, we look forward to the continued progress of the SHPD under the leadership of Dr. Downer and his very capable staff. As always, thank you for your commitment to the success of Hawaii's State Historic Preservation Division.

Sincerely,



Stephanie Toothman, Ph.D.

Associate Director, Cultural Resources, Partnerships,
and Science

Enclosure: HI CAP2 Final Submission: Comments on SHPD IT/GIS Elements
Matrix of CAP-2 elements and specific status as of 05-30-14.

cc: Alan Downer, Ph.D., Administrator, State Historic Preservation Division
Jesse Souki, Deputy Chairperson, Department of Land and Natural Resources