

From Maui Cultural Lands, Inc

July 7, 2015

To: State Historic Preservation Division, Maui Office

Re: An Archaeological Inventory Survey for Off-Site Improvements Associated with the Proposed Pillani Promenade Project, and Updated Recommendations for Sites Identified in Prior 1994 AIS, Ka'ono'ulu Ahuapua'a TMK 3-9-001: 16, 169, 170 - 174) (AND VARIOUS OFF-SITE TMKS)

Aloha Morgan and SHPD Maui 'Ohana:

We would like to share with you some considerations regarding the updated review of the AIS for this project area. First of all, we believe the Xamanek Research staff made an honest effort in their field work and we appreciate that they have affixed permanent site markers to the sites they did re-document, and are proposing additional test units.

We do not however agree that these test units should only be viewed in the context of "data recovery" for sites cleared for eventual destruction. We feel that additional information is available that should be included in the revised AIS and trigger a re-evaluation of some site significances.

The project area was resurveyed during a rainy period in early 2014, when plant cover was dense and we believe that this led to a high number (nine of twenty sites) being unlocated and considered "destroyed," and lack of further features being observed. There is also other new information available that is needed to make the AIS complete and acceptable.

This project area should have a site visit for SHPD and interested parties as soon as possible. Mr. Fredricksen was very supportive of this idea when we met with him and Mr. Jencks in February 2014 and Mr. Jencks also agreed to it. The idea was to wait until the foliage had died down and viewing conditions were better. This summer would be an excellent time. We ask that you support this idea in your future comments

Mahalo for this opportunity to offer our comments on the AIS during your review process.

We also ask SHPD to consider the information below in its comments.

1. "UNLOCATED STES" ON THE LAND MAY NOT BE DESTROYED AND NEW SITES COULD BE FOUND.

"Sites that were not relocated in relatively recently disturbed areas include Sites 3729-3734, 3737, 3738, and 3739." from 2014 Draft Pi'ilani Promenade AIS.

Several Cultural accesses by MCL volunteers and others (after the 2014 AIS was issued), have relocated at least one previously recorded site, (which we believe to be SIHP 3732) not relocated in the 2014 AIS, and thought to be "destroyed." MCL volunteers also found another potential cultural site nearby, partially covered in high grass and piled with branches. This potential site was not described in either the 1994 or 2014 AIS.

Unrecorded midden and other potential unrecorded historic properties and cultural sites were also observed on various areas of the project property where NO sites were recorded. Other sites that were listed as destroyed in the Draft AIS may very well be more visible now. **A short slide show is included to illustrate these points.** We urge SHPD to require more field work to be done under better site conditions, since nearly 50% of previously recorded sites were not relocated, and were assumed destroyed.

2. ADDITIONAL UNRECORDED SITES ARE FOUND ON ADJACENT LAND.

Additional unrecorded sites are located between the Pi'ilani Promenade parcel and Kulanihako'i Gulch. These were not recorded in the Shefcheck et al report done in 2008 for adjoining landowner Kaonoulu Ranch. There were potential flood control improvement impacts to this general area proposed in the original Pi'ilani Promenade plan. We would ask that one of the landowners be held responsible for recording these sites. **Pictures of sites and a location map are provided in our slideshow**

3. CULTURAL PRACTITIONERS WANT TO CONTRIBUTE TO SITE SIGNIFICANCE

EVALUATION. It is our understanding that the land and the vicinity has cultural use and cultural importance that should be recognized and respected. Cultural practitioners ascribe a broader use and significance to a number of the recorded sites, as well as several unrecorded features and request that this traditional knowledge be considered alongside western archaeological investigations. Some sites should be preserved and incorporated into the project design. The slide show will illustrate this more specifically.

4. MORE INFORMATION IS AVAILABLE ABOUT SITES FIRST DOCUMENTED IN 1994.

Archaeological studies done in 1997 and 2000 as part of the proposed Kihei-Upcountry Highway corridor EIS (CSH, 2000) indicate the presence of additional aspects of what would appear to be one of the sites recorded in 1994 on this property (SIHP 3727). We would request, in the interests of public knowledge, that information from these AIS documents be included in the final accepted Pi'ilani Promenade AIS and that verified and updated information about site 3727 be included in any final AIS SHPD would accept. (Documents from the Upcountry Highway AIS are included in the slideshow.)

We appreciate your consideration of our comments and are happy to answer any questions you may have and go over the slide show with you.

Mahalo for your dedicated work

South Maui Committee of Maui Cultural Lands
Daniel Kanahele
Lucienne de Naie
Clare Apana