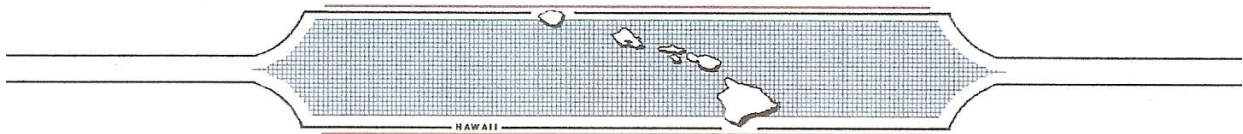


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8/17/ 2016

**Re: Archaeological Sites Inspection Letter Report for 20 Previously Recorded Archaeological Sites Located on 66.039 Acres of Land in Hōlualoa 1<sup>st</sup> Ahupua'a, Kailua-Kona, North Kona District, Hawai'i Island [Portions of TMK: (3) 7-6-021:016 and 017].**

Aloha e Mr. Wheelock:

At the request of property co-owner Richard Wheelock, Scientific Consultant Services, Inc. (SCS) conducted an archaeological sites inspection of 20 previously recorded archaeological sites and the remains of two modern agricultural areas (Table 1) located on the two parcels referenced in the subject heading above (Enclosures 1, 2, and 3). The sites were previously recorded in a State Historic Preservation Division (SHPD) approved archaeological inventory survey report (AIS) prepared by Cultural Survey Hawai'i, Inc. (CSH) (Hammatt et al. 1992) [Enclosure 4]. The archaeological sites inspection included relocating the 20 sites and two modern agricultural areas, if still present on the property, and assessing the accuracy of the site descriptions recorded in the CSH AIS report.

The project area is between 320 to 690 feet (98 to 210 meters) above mean sea level (amsl). The project area lands are part of a large former cattle ranch and agricultural area that was started in the early 1900s. The lower portion of the project area is still used to pasture cattle. The project area and surrounding lands were bulldozed sometime between the 1940s and 1970s. Evidence of bulldozing is visible in aerial photographs as alternating bands of cleared bulldozer tracks and bands of push pile. Pedestrian survey confirmed the linear bands in the aerial photographs are bulldozer-cleared paths and linear piles of bulldozed rock along the cleared bulldozer paths.

The property is bounded to the north by undeveloped cattle pasture, to the east and south by residential subdivisions and by Queen Ka'ahumanu Highway to the west. The property is owned by Kona Three, LLC. The owner's mailing address is 181 Kalaniana'ole Street Hilo, HI 96720-4703.

**Table 1:** Inventory of Previously Recorded Archaeological Sites (Hammatt et al. 1992).

SIHP#	CSH Site#	Parcel	Type	Function	Age	Excavation	UNITS	Cultural Material
10011	9	016	Platform	Ag. Clearing	Prehistoric	Tested	1.5 m long trench	3 cowrie shells
10012	10	016	Platform & Wall	Burial	Prehistoric	Excavated	Entire Feature	
10013	11	016	Enclosure & Lava Tube	Habitation	Prehistoric	Excavated	4.5 m square total	Fire features & Prehistoric artifacts
10015	13	017	Terrace	Road Bed	Historic	No		
10017	15	017	Platform	Cattle Ramp	Historic	No		
10018	16	017	Enclosure	Habitation	Historic	No		
10019	17	017	6 Rock Mounds	Ag. Clearing	Historic	Tested	3 1.0 m wide trenches	Metal File
10020	18	016	Platform	Ag. Clearing	Historic	No		
10033	112	017	Planting Complex	Coffee Ag	Historic	No		
10034	113	016	Platform	Ag. Clearing	Historic	No		
10049	216	016	Terraces	Agriculture	Historic	No		
10067	232	017	Terraces	Habitation	Prehistoric	Tested	1.0 X 1.0 m	VG & a small amount of midden & fire feature
10068	233	016	Enclosure	Habitation	Prehistoric	Tested	1.0 X 0.5 m	small amount of midden
10069	234	017	Modified Bluff/Platform	Habitation	Historic	Tested	0.5 X 0.5 m	VG & a small amount of midden
10070	235	017	U-Shape Enclosure	Agriculture	Historic	Tested	1.0 X 0.5 m	No artifacts
10071	237	016	Platform	Habitation	Prehistoric	No		
10072	238	016	Modified Bluff	Ag. Clearing	Historic	Tested	1.5 X 2.0 m & TU-2	No arts Small amount of MS in TU-2
10073	239	016	Platforms	Ranching/Ag.	Historic	No		
10074	240	016	Enclosure	Coffee Work Shed	Historic	Tested	0.5 X 0.5 m	1 VG, little MS, historic artifacts
10075	241	016	Enclosure	Pig Pen	Historic	No		
		016	Historic Planting Terraces	Agriculture	Modern	No		
		017	Bluff Terraces	Agriculture	Modern	No		

### **Environmental Background**

The property is located at 430 feet (131 meters) to 610 feet (186 meters) above mean sea level on a single Hualālai lava flow dated between 5,000 and 10,000 years before present (Wolfe and Morris 1996). Soil in the project area is Punalu‘u Series (rPYD series) extremely rocky peat with six to twenty percent slopes (Sato 1973:48). The majority of the project area has been bulldozed in the past and the present ground surface is rocky soil.

Rainfall in the project area is very low, less than thirty inches per year. There is a seasonal gulch along the southern edge of the project area and a second gulch that divides Parcel 016 and Parcel 017. This region is extremely dry, hot, and somewhat barren except for thick California grass (*Urochloa mutica*), Guinea grass (*Megathyrsus maximus*), and some koa haole (*Leucaena leucocephala*), kiawe (*Prosopis pallida*), and kukui nut (*Aleurites moluccana*) trees (Starr Environmental 2016).

Historic era and Modern era ranching and agriculture and the use of bulldozers to create dirt roads and clear large areas of the project area was apparent to the CSH field crew during their survey work (Hammatt 1992:i, 7-10) and was apparent during the course of the current sites inspection fieldwork. The CSH AIS report noted that “virtually every area of the property was either bulldozed or heavily modified for planting this century... The majority of sites were bulldozed around the perimeter and many were damaged by a bulldozer running over the site. Some sites survived because they were near walls or in rocky areas unsuitable for grazing improvement. Some sites were actually partially buried under bulldozer fill” (Hammatt et al. 1992:11).

### **CSH AIS Scope of Work**

The CSH archaeological study consisted of surface survey, testing, and excavation and included the following tasks (Hammatt et al. 1992:12):

1. To locate and describe all archaeological sites on the property.
2. To locate all sites on the survey base map provided.
3. To conduct archaeological excavations in selected sites to determine the nature and depth of cultural material.
4. To collect basaltic glass and charcoal.
5. To remove and relocate human burials.
6. To prepare a final report which presents the results of all work accomplished including: analysis of the material and information collected in the field including basaltic glass to determine the time range of occupation of the sites; interpretation of site function; and to present recommendations based on the results of these investigations.

A fuller description of the CSH AIS fieldwork is included in a February 8, 1993 letter to the Hawai'i State Historic Preservation Division (SHPD) from Gregg Kashiwa, Project Manager for Gamrex, Inc., the former property owner [Enclosure 5].

According to the letter, CSH conducted a pedestrian survey of the property in early 1983. A summary of the fieldwork and identified sites was submitted and SHPD Archaeologist Wendell Kam and County of Hawai'i Planning Department Archaeologist Virginia Goldstein. After reviewing the summary, they determined the level of field work recording for the sites. Mr. Kam and Ms. Goldstein conducted a site visit, after which they concluded that many of the sites identified in the pedestrian survey were historic in nature (i.e. bulldozer tailings, etc.) and did not warrant further documentation.

As the *iwi* at the two identified burial sites, including SIHP #10012 (CSH Site 10) had already been removed at that time, it was agreed that the burial sites should be further dismantled to ensure that no other burials were present and that all of the *iwi* had been collected. That work was completed under the supervision of CSH archaeologists. There were no additional remains located at either site. The sites were left deconstructed.

SCS Senior Archaeologist Glenn Escott contacted Gregg Kashiwa by phone on April 19, 2016 to ask about the final disposition of the *iwi* at SIHP #10012 (CSH Site 10). He recounted that the *iwi* were first transported to the University of Hawai'i Hilo (UH-Hilo) for laboratory analysis. UH-Hilo later contacted Mr. Kashiwa and requested that he pick the *iwi* up. Mr. Kashiwa arranged to reinter the *iwi* at Pu'uhonua o Hōnaunau National Historic Park (NHP). He was met by an NHP employee who directed him to an open area in the south corner of the park. He was instructed to put the *iwi* in the ground and cover them with rocks.

SCS Senior Archaeologist Glenn Escott contact Pu'uhonua o Hōnaunau, NHP Chief of Integrated Resources Management/Archaeologist Adam Johnson, M.A. in April of 2016 to ask if they had any record of the reinterment. Mr. Johnson replied by email and by phone on May 11, 2016 that they were not able to locate any official correspondence regarding the reinterment, but that such records were not regularly kept at that time.

### **Sites Inspection Methods**

There were 21 archaeological sites and two modern agricultural areas identified on Parcel 016 and Parcel 017 during the CSH AIS study (Hammatt et al. 1992). One of the archaeological sites (Site 111) was located in a five acre exclusion area in the southeast corner of Parcel 017 and was not recorded during the CSH AIS study [see Enclosure 3]. Site 111 has been documented in a separate AIS report (Escott and Escott 2016 Draft) for the five acre exclusion area.

SCS Senior Archaeologist Glenn Escott, M.A. generated GPS points for each of the remaining 20 sites and the two modern agricultural areas by overlaying the CSH project area site map on a USGS topographic map using ArcGIS Explorer. The GPS points for each site were loaded on a Garmin GPSMAP64 hand-held unit. The previously identified sites were located in the field by navigating to the GPS site points. The previously identified sites were identified at the GPS points generated in this manner, showing that the CSH project area site map was correct.

The CSH AIS report site descriptions [see Enclosure 4] were used in the field to assess the correctness of the AIS descriptions for each site. The sites were assessed for overall site dimensions, construction method, form (type), function, and age. Additional information was added to this letter report when additional information was available from the sites inspections. Site relocation and assessment field work was conducted by Glenn Escott, M.A. and Suzan Escott, B.A. in July 2016 and totaled 80 hours. Glenn Escott was the principal investigator and project director.

### **Field Inspection Results**

Seven of the 20 archaeological sites (SIHP #10015, 10017, 10018, 10020, 10033, 10034, and 10049) were recorded by CSH in tabular format only (Table 2). These are sites identified during the pedestrian survey that were determined to be associated with modern clearing and agricultural activities and no written description or plan maps were generated. Written descriptions of the remaining 13 sites are in the CSH AIS report. Excavations were conducted at ten of the 13 sites. There are planview figures for four of the 13 sites.

#### **SIHP #10011 (CSH Site 9)**

The CSH AIS dimensions and description of Site 10011 were assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a rectangular platform on slightly sloping bulldozed pasture land. As described by CSH, the feature has formal construction elements suggesting possible use other than agricultural rock clearing, including larger rocks (small boulders) forming an outer perimeter with smaller rocks (cobbles) forming the interior top surface. The outer perimeter is stacked one to two courses high and is roughly faced along the south side. The top surface of the platform is a slightly uneven and level rock paving.

CSH excavated a 1.5 m wide trench through the platform and recovered three cowrie shells, suggesting the platform is a rock clearing mound. The location of the trench within the feature, the length of the trench, and the methods used to recover cultural material are not described in the CSH AIS. While the form, construction method, location of the feature suggest it is a temporary habitation feature or a feature used for activities associated with agriculture, the small amount of cultural material recovered from subsurface excavation suggest it is a rock clearing mound. The platform appears to be unaltered and is in good condition.

**Table 2: Inventory of Archaeological Sites Inspection and Assessment Results.**

SIHP#	CSH #	Type	Function	Age	Excavation	Level of AIS Recording	Site Assessment
10011	9	Platform	Ag. Clearing	Prehistoric	Tested	Description & Planview	AIS Site Description Correct
10012	10	Platform & Wall	Burial	Prehistoric	Excavated	Description, Planview, & Profiles	AIS Site Description Correct
10013	11	Enclosure & Lava Tube	Habitation	Prehistoric	Excavated	Description & Planview	AIS Site Description Correct
10015	13	Terrace	Road Bed	Historic	No	Tabular	AIS Site Description Correct
10017	15	Platform	Cattle Ramp	Historic	No	Tabular & Short Description	Bulldozed – No Longer Present
10018	16	Enclosure	Habitation	Historic	No	Tabular & Short Description	Natural Bedrock Outcrop
10019	17	6 Rock Mounds	Ag. Clearing	Historic	Tested	Description	AIS Site Description Correct
10020	18	Platform	Ag. Clearing	Historic	No	Tabular & Short Description	Natural Bedrock Outcrop
10033	112	Planting Complex	Coffee Ag	Historic	No	Tabular & Short Description	Bulldozed – No Longer Present
10034	113	Platform	Ag. Clearing	Historic	No	Tabular	AIS Site Description Correct
10049	216	Terraces	Agriculture	Historic	No	Tabular & Short Description	Bulldozed – No Longer Present
10067	232	Terraces	Habitation	Prehistoric	Tested	Description & Planview	AIS Site Description Correct
10068	233	Enclosure	Habitation	Prehistoric	Tested	Description & Planview	AIS Site Description Correct
10069	234	Modified Bluff/Platform	Habitation	Historic	Tested	Description	AIS Site Description Correct
10070	235	U-Shape Enclosure	Agriculture	Historic	Tested	Description	AIS Site Description Correct
10071	237	Platform	Habitation	Prehistoric	No	Description & Planview	Relocated - Bulldozed
10072	238	Modified Bluff	Ag. Clearing	Historic	Tested	Description, Planview, & Profile	AIS Site Description Likely Correct
10073	239	Platforms	Ranching/Ag.	Historic	No	Description	Relocated - Bulldozed
10074	240	Enclosure	Coffee Work Shed	Historic	Tested	Description	AIS Site Description Likely Correct
10075	241	Enclosure	Pig Pen	Historic	No	Description, Planview, & Profile	AIS Site Description Likely Correct
		Historic Planting Terraces	Agriculture	Modern	No	On Project Map	AIS Site Description Likely Correct
		Bluff Terraces	Agriculture	Modern	No	On Project Map	AIS Description Correct

SIHP #10012 (CSH Site 10)

The CSH AIS dimensions and description of Site 10012 were assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a rectangular platform (mound) and rock wall segment on slightly sloping bulldozed pasture land. The platform has been bulldozed and only the base of the feature remains. A 1.0 m by 1.0 m test-unit was excavated in the center of the feature to determine the presence or absence of *iwi*. The test-unit was excavated to bedrock and all material was screened through 1/8<sup>th</sup> inch mesh screen. There were no *iwi* fragments and no other cultural material recovered from the excavation. The platform has been bulldozed and is in poor condition.

The L-shape rock wall segment was located approximately 95.0 meters southwest of the burial platform. It is roughly 23.0 m long (NE/SW) by 1.0 m wide and between 0.5 and 0.9 m in height. The wall is constructed of angular and subangular cobbles and small boulders. It is cobble core filled and bi-faced. The wall is partially collapsed in places and is in good condition.

SIHP #10013 (CSH Site 11)

The CSH AIS dimensions and description of Site 10013 were assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a roughly square enclosure and a small modified lava tube. The enclosure appears to have been partially bulldozed after the CSH AIS fieldwork was completed, as the wall heights are much lower than those described in the AIS report. Rocks from the bulldozed walls are piled along the edges of the enclosure. The base of the enclosure walls is still evident on the ground surface. The CSH AIS lava tube description was assessed to be correct. The interior of the short lava tube is not modified. Site 10013 has been altered by bulldozing and is in fair to poor condition.

SIHP #10015 (CSH Site 13)

The CSH AIS description of Site 10015 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a modern dirt road bed.

SIHP #10017 (CSH Site 15)

Site 10017 is described in the CSH pedestrian survey summary table as a cattle loading ramp. The area where Site 10017 was plotted on the project map is an area of bulldozed pasture with numerous large bulldozer push piles. It was determined through consultation with SHPD and Hawai'i County Planning that the feature did not warrant a written description in the CSH AIS report. It is possible that the feature was determined to be a bulldozer pile after CSH first identified it, or it might have been bulldozed later. The possible cattle loading ramp (Site 10017) appears to have been bulldozed or was originally a bulldozer push pile.

SIHP #10018 (CSH Site 16)

Site 10018 is described in the CSH pedestrian survey summary table as an enclosure. The area where Site 10018 was plotted on the project map is an area of natural bedrock outcrop surrounding a large tamarind tree. The bare bedrock outcrop encloses a roughly level area of soil. There are no modifications to the outcrop. CSH did not include a site description or map of the enclosure in the AIS report, likely because it was determined to be natural. There are not other archaeological features in the area around the bedrock outcrop. A final possibility is that the Site 10018 feature was bulldozed after the CSH AIS work was completed.

SIHP #10019 (CSH Site 17)

The CSH AIS dimensions and description of Site 10019 were assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is six rock clearing mounds located along the southeast edge of a seasonal gulch. The presence of a metal file recovered during excavation of one of the mounds suggests the mounds are modern. The rock mounds, appear to have been impacted by flood events, they are partially collapsed, and are in fair to poor condition.

SIHP #10020 (CSH Site 18)

Site 10019 is described in the CSH pedestrian survey summary table as a platform. The area where Site 10019 was plotted on the project map is an area of bulldozed pasture with natural bedrock outcrops and loose rocks. A roughly rectangular pile of natural bedrock boulders was identified at the location of Site 10019. The boulders are naturally occurring bedrock small boulders and cobbles. There is a portion along the west side of the pile that appears to contain bulldozer push from a nearby wall breach. The top of the rock pile is uneven but somewhat level. There is no stacking or facing apparent on the rock pile. The pile is natural, but its roughly rectangular shape and somewhat level top surface make it appear to be a possible archaeological feature. It is likely that CSH added the feature to their pedestrian survey summary table for these reasons. CSH did not include a site description or map of the feature in the AIS report, likely because it was determined to be natural.

SIHP #10033 (CSH Site 112)

Site 10033 is described in the CSH pedestrian survey summary table as a planting complex associated with modern coffee agriculture. There were coffee trees in the area when CSH conducted their AIS fieldwork. The area where Site 10033 was plotted on the project map is an area of bulldozed pasture along the southeast edge of a seasonal gulch. During the current sites inspection, it was apparent that the ground surface in this area has been impacted by flood events and bulldozing. There are no longer coffee trees and there is only a single short wall segment in the area where Site 10033 was previously identified. The planting features are no longer present.



The L-shape wall segment is roughly 5.0 m long (N/S) by 1.0 m wide and is 1.0 m in maximum height. The wall is constructed of angular and subangular cobbles and small boulders. It is cobble core filled and bi-faced. The wall has been bulldozed on both ends and is in fair condition.

SIHP #10034 (CSH Site 113)

The CSH AIS description of Site 10034 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site was described in the CSH pedestrian survey summary table as a platform (rock mound). It was determined through consultation with SHPD and Hawai'i County Planning that the features did not warrant a written description in the CSH AIS report. The feature was relocated along the north edge of a seasonal gulch during the current site inspection. The platform appears to have been bulldozed. Currently, the feature is a roughly 2.5 m long (E/W) by 1.8 m wide by 0.35 m high concentration of rock. The base of the platform appears to be intact in the ground surface. It is possible that the feature was in this state when CSH first identified it, or it might have been bulldozed later. The feature is most likely a rock clearing mound. It has been impacted by bulldozing and is in poor condition.

SIHP #10049 (CSH Site 216)

Site 100493 is described in the CSH pedestrian survey summary table as two linear agricultural terraces. The area where Site 10033 was plotted on the project map is along the bulldozed north bank of a seasonal gulch. During the current sites inspection, it was apparent that the ground surface in this area has been impacted by flood events and bulldozing. Site 10049 has been bulldozed and is no longer present.

SIHP #10067 (CSH Site 232)

The CSH AIS description of Site 10067 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a rock wall and several soil retaining terraces constructed on the sloping north bank of a seasonal gulch. Cultural material recovered from excavations suggests the site is Prehistoric in age and is likely associated with temporary habitation and agriculture. The site appears to be unaltered and is in good condition.

SIHP #10068 (CSH Site 233)

The CSH AIS description of Site 10068 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a small rectangular enclosure. Cultural material recovered from excavations suggests the site is Prehistoric in age and is likely associated with temporary habitation. The site has been bulldozed and only the base of the enclosure walls remains, except for the southeast corner of the enclosure which remains standing.

SIHP #10069 (CSH Site 234)

The CSH AIS description of Site 10069 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a modified bluff/platform. Cultural material recovered from excavations suggests the site is a Prehistoric volcanic-glass tool working site associated with nearby agriculture. The site had been bulldozed prior to the CSH AIS. It is in poor condition.

SIHP #10070 (CSH Site 235)

The CSH AIS description of Site 10070 was assessed to be correct. The site was relocated exactly where the CSH AIS project map showed it. The site is U-shape enclosure. The feature construction, the lack of cultural material recovered from test excavation, and the enclosure's proximity to Historic era agricultural rock clearing mounds all suggest the enclosure is related to Historic era agriculture, most likely coffee growing. The site had been partially bulldozed prior to the CSH AIS. It is in poor condition.

SIHP #10071 (CSH Site 237)

The CSH AIS description of Site 10071 was assessed to be most likely correct. The site was relocated exactly where the CSH AIS project map showed it. The site was described in the CSH pedestrian survey summary table as a rectangular platform. The feature was relocated along the north edge of a seasonal gulch during the current site inspection and appears to have been bulldozed after the CSH AIS fieldwork. The feature is now a roughly 5.8 m long (E/W) by 5.0 m wide concentration of loose rocks on the bulldozed level ground surface. There are bulldozer track marks on the loose rocks and on surrounding exposed bedrock. The feature is in poor condition.

SIHP #10072 (CSH Site 238)

The CSH AIS description of Site 10072 was assessed to be most likely correct. The site was relocated exactly where the CSH AIS project map showed it. The site includes two large modified outcrops, terraces, rock clearing mounds, and level soil areas. Test excavation of the largest bedrock did not contain cultural material. A small amount of sea urchin shell was recovered from additional testing of one of the rock mounds. The CSH AIS interpreted the site as associated with Historic era agriculture. It is possible based on the feature types and construction method that the site is associated with pre-Contact era agriculture, though the limited subsurface test excavations to date do not support this interpretation. The site appears to be unaltered and is in good condition.

SIHP #10073 (CSH Site 239)

The CSH AIS description of Site 10073 was assessed to be most likely correct. The site was relocated exactly where the CSH AIS project map showed it. The site was described in the CSH AIS report as two platforms or cattle loading chutes or ramps. The features were both relocated along the edge of a *mauka-makai* ranch road during the current site inspection and appear to be bulldozer push piles. It is possible that the features were in

this state when CSH first identified them, or they might have been bulldozed later. The two features at Site 10073 appear to be bulldozer push piles.

#### SIHP #10074 (CSH Site 240)

The CSH AIS description of Site 10074 was assessed to be most likely correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a roughly square rock enclosure likely used as a foundation for an Historic era structure associated with commercial agriculture. Cultural material recorded at the site included both Prehistoric and Historic era artifacts. The site was bulldozed at some time after the CSH AIS study. All that remains is the partially collapsed portion of what appears to be the southeast corner of the enclosure wall. The site is in poor condition.

#### SIHP #10075 (CSH Site 241)

The CSH AIS description of Site 10075 was assessed to be most likely correct. The site was relocated exactly where the CSH AIS project map showed it. The site is a roughly square rock enclosure interpreted as an Historic era pig pen. The site appears to have been partially bulldozed at some time after the CSH AIS study. Portions of the wall corners remain and the walls are no longer as high as they are described in the CSH AIS report. The site is in poor condition.

#### Historic Planting Terraces

The CSH AIS identified an area containing Historic era planting terraces within the northeast portion of Parcel 016. The features were relocated exactly where the CSH AIS project map showed them. The features included rock mounds, linear rock alignments, terraces, modified outcrops, and level soil areas. The features were not subjected to subsurface testing during the CSH AIS. It was likely determined through consultation with SHPD and Hawai'i County Planning that the features did not warrant testing or written descriptions. The features might be Historic in age.

#### Bluff Terraces

The CSH AIS identified an area containing bluff terraces within the southeast portion of Parcel 017. The features were relocated exactly where the CSH AIS project map showed them. The features were not described in the CSH study because it was determined that the features were modern bulldozer push piles. Pedestrian survey of the area for during the current sites inspection confirmed they are bulldozer push piles.

#### **Sites Inspection Summary**

All but three (Site 10017, 10033, and 10049) of the 20 archaeological sites recorded in the CSH AIS are still present on the project area. Two sites (Site 10071 and 10073) were present but bulldozed to the point that a precise assessment was difficult to make. Although the CSH AIS site descriptions for Site 10071 and 10073 appear likely correct. Two sites (Site 10018 and 10020) were determined to be natural geological features.

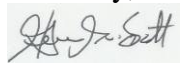
Of the 13 sites that were not completely or badly impacted by bulldozing, ten were determined to be correctly recorded in the CSH AIS report, and three were determined to be likely correctly recorded in the CSH AIS report.

The Historic planting terraces recorded in the northeast portion of Parcel 016 was determined to be likely correctly recorded, and the bluff terraces recorded in the south east portion of Parcel 017 was determined to be correctly recorded in the CSH AIS report.

Based on the CSH AIS report [see Enclosure 4] and the February 8, 1993 Gamrex, Inc. letter to SHPD [see Enclosure 5], CSH recorded 20 archaeological sites and two Historic/Modern era agricultural areas during their initial pedestrian survey. These sites were described in tabular format and a pedestrian survey summary was given to SHPD and Hawai'i County Planning for review. SHPD and County Planning then made a site visit to consult with CSH on the preliminary site interpretations and the appropriate level of documentation for each site. CSH then returned to selected sites and recorded written descriptions and made site and feature plan maps for sites that required them. The remaining sites were either determined to be natural or associated with Historic/Modern era commercial agriculture and no further documentation was required in the AIS report.

Overall, based on the current sites inspection and assessment, the CSH AIS report correctly identified project area archaeological sites and tested, recorded, and interpreted them correctly. All of the Parcel 016 and Parcel 017 archaeological sites documented in the CSH AIS report were recommended for no further work (Hammatt et al. 1992:60). The recommendation was made as "the significant material from the study area has been recovered and further investigation would be of minimum productivity" (Hammatt et al. 1992:60).

Sincerely,



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Enclosures:

- Enclosure 1: Hawai'i Island Project Area Map
- Enclosure 2: USGS TMK Project Area Map
- Enclosure 3: USGS TMK Project Area and Archaeological Sites Map
- Enclosure 4: CSH AIS Report and SHPD Approval Letter
- Enclosure 5: Gamrex, Inc. Letter to SHPD

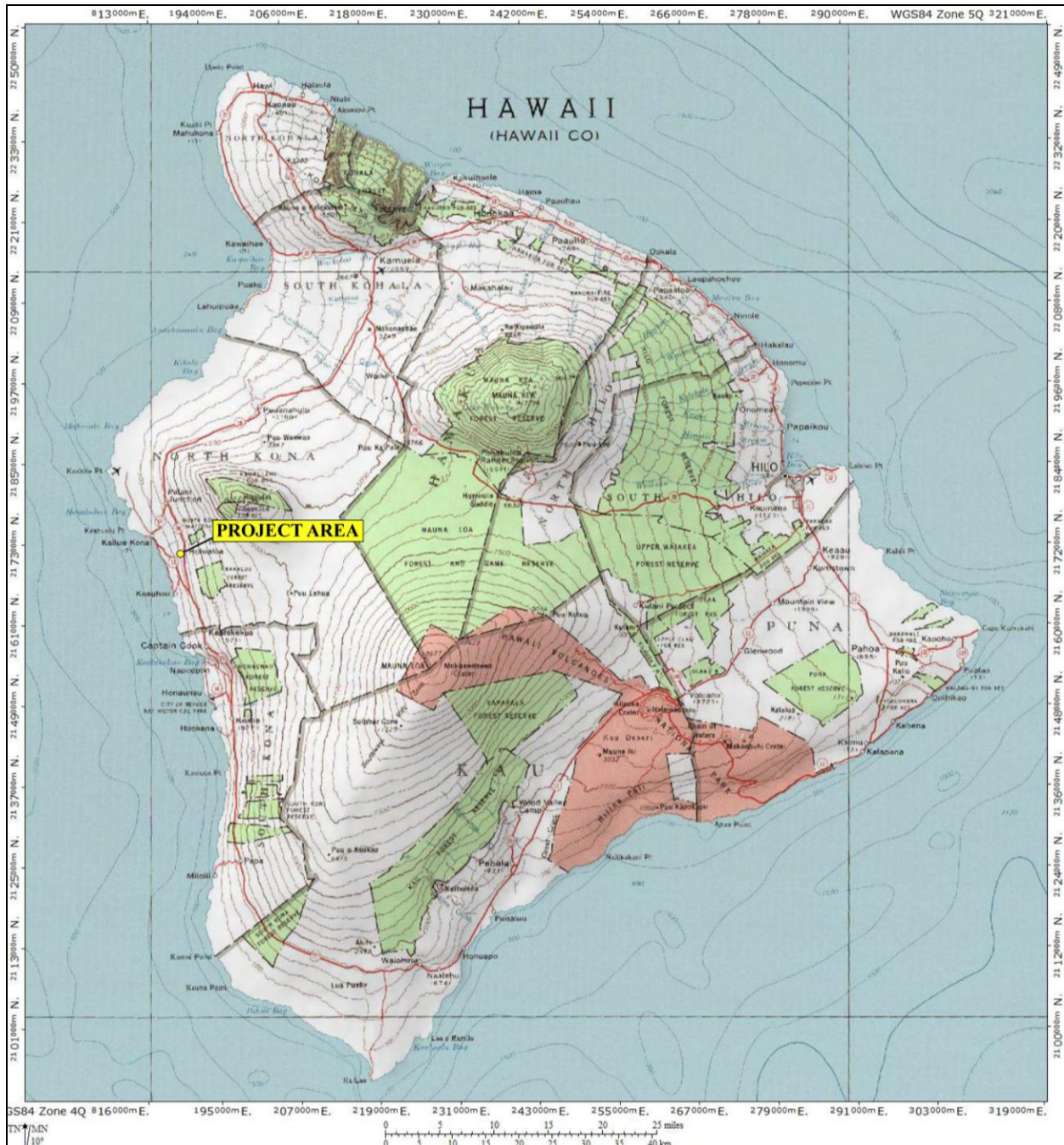
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2016 *Archaeological Inventory Survey Report for 5.0 Acres Located in Hōlualoa 1<sup>st</sup> Ahupua‘a, North Kona District, Hawai‘i Island, Hawai‘i [TMK: (3) 7-6-021:017 Por.]*. SCS Draft Report #1871-1 prepared for East West Realty, Honolulu.

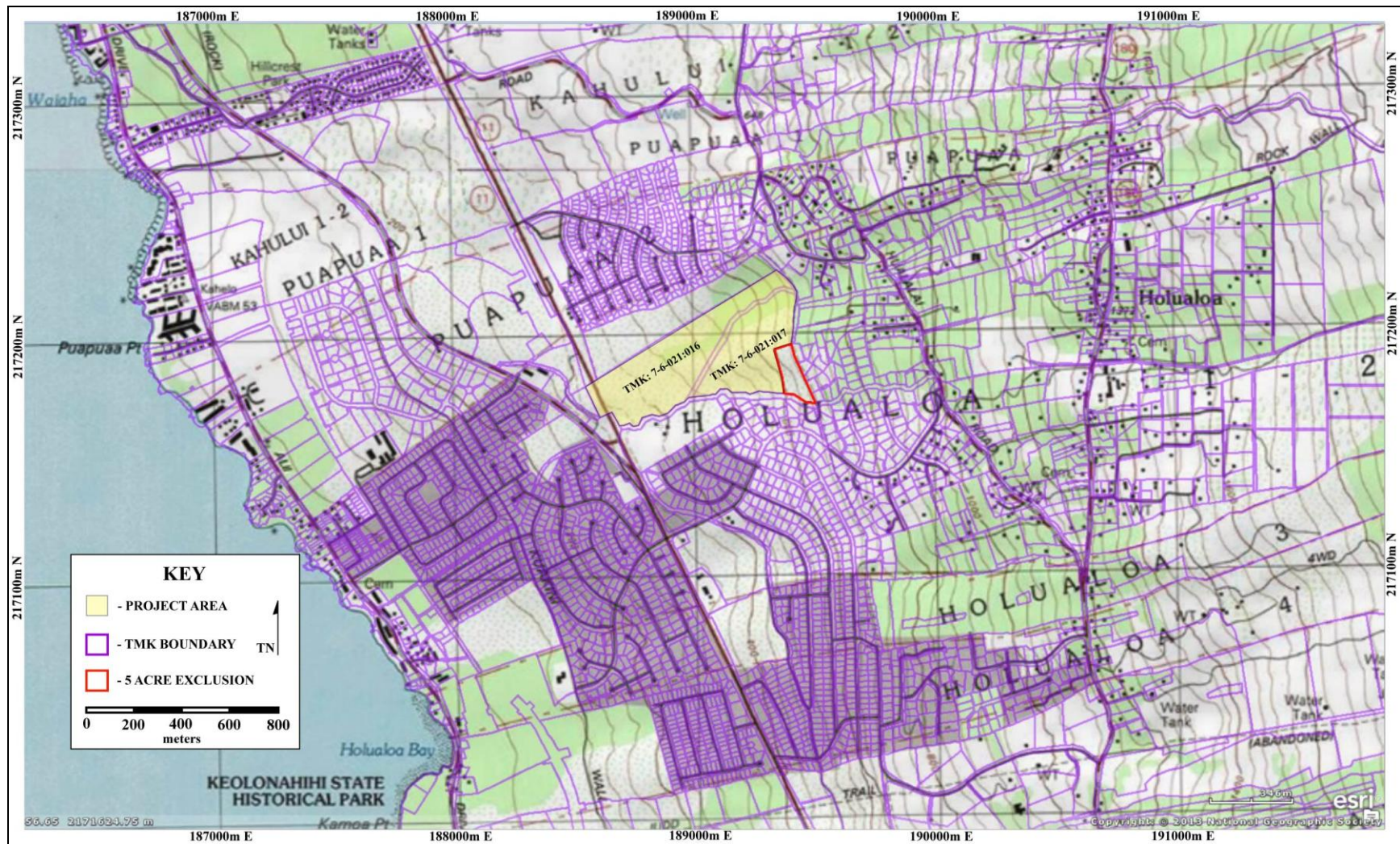
Hammatt, H., W. Folk, and D. Shideler

1992 *Archaeological Survey, Testing and Excavation of a 174 Acre Parcel, Hōlualoa, North Kona Hawai‘i*. Cultural Survey Hawai‘i report prepared for Gamlon Corporation, Honolulu.



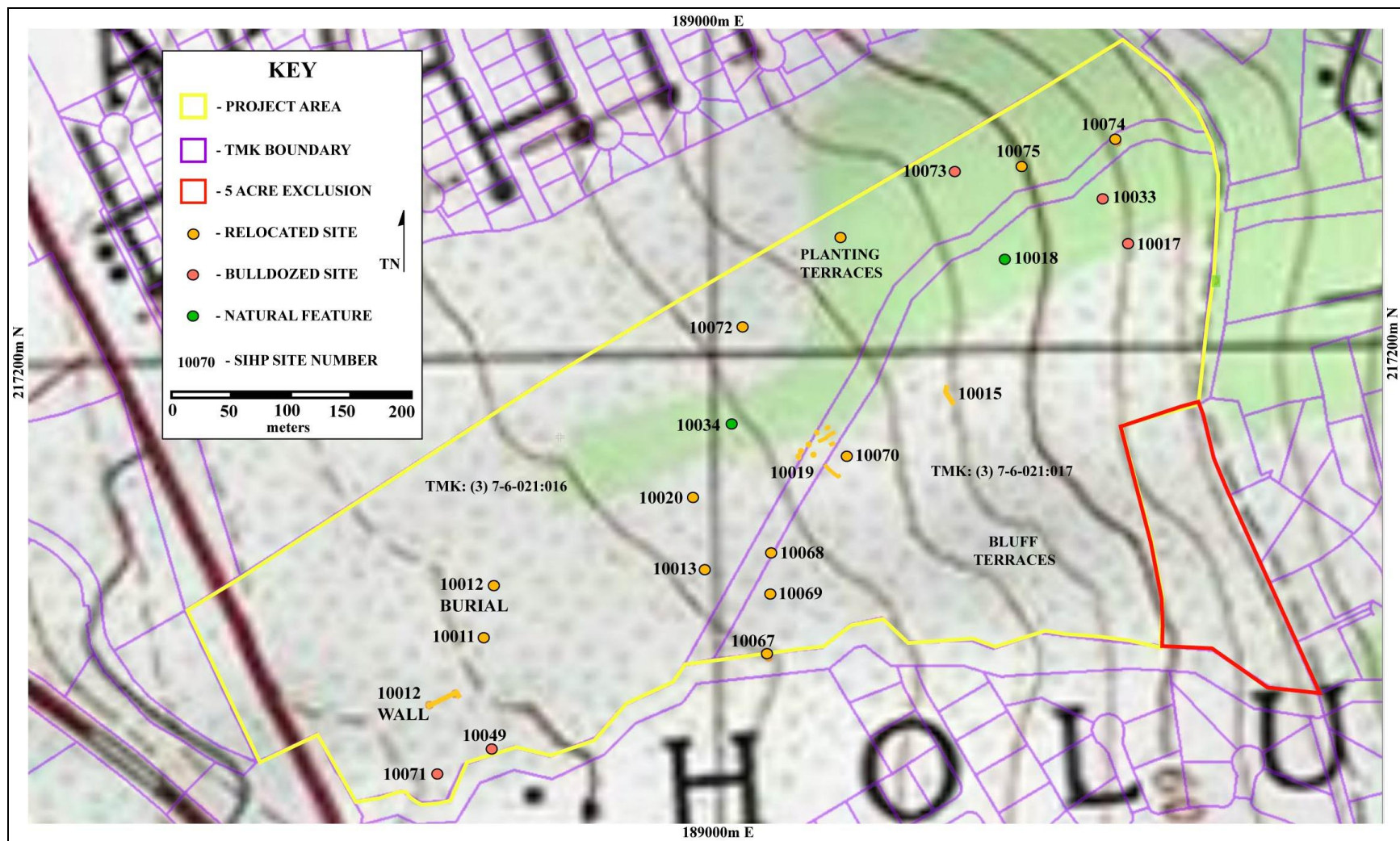
**Enclosure 1: 5,500 K-Series Map of Hawai'i Showing Location of Project Area (National Geographic Topo!, 2003. Sources: National Geographic Society, USGS).**





**Enclosure 2:** 7.5-Minute Series USGS Topographic Map Showing Location of Field Inspection Survey Areas (ESRI, 2011. Sources: National Geographic Society, USGS. Kealakekua Quadrangle).





**Enclosure 3:** 7.5-Minute Series USGS Topographic Map Showing Location of Archaeological Sites (ESRI, 2011. Sources: National Geographic Society, USGS. Kealakekua Quadrangle).



**Enclosure 4: Cultural Surveys Hawai'i AIS Report Site Descriptions (Hammatt et al. 1992).**

**SIHP #10011 (CSH SITE 9)**

**DESCRIPTION:** This site is a rectangular stone platform 16 feet long, 14 feet wide and 4 feet high with well sorted cobble paving on the top surface (Figure 1). The site lies on a bluff edge and is surrounded by bulldozed pasture land. There is 2 to 4 feet of collapsed rock surrounding the down-slope and north sides of the site.

**TEST RESULTS:** A trench 1.5 meters wide was excavated through the platform on an east west (*mauka-makai*) axis. Upon removal of the platform rocks, a sterile Pahala ash "C" horizon was encountered above bedrock. The entire midden and artifact assemblage consisted of 3 cowrie shell fragments. No burials were encountered. Despite the formal appearance of the platform it is assumed to have been a field clearance feature.

[Hammatt et al. 1992:27]

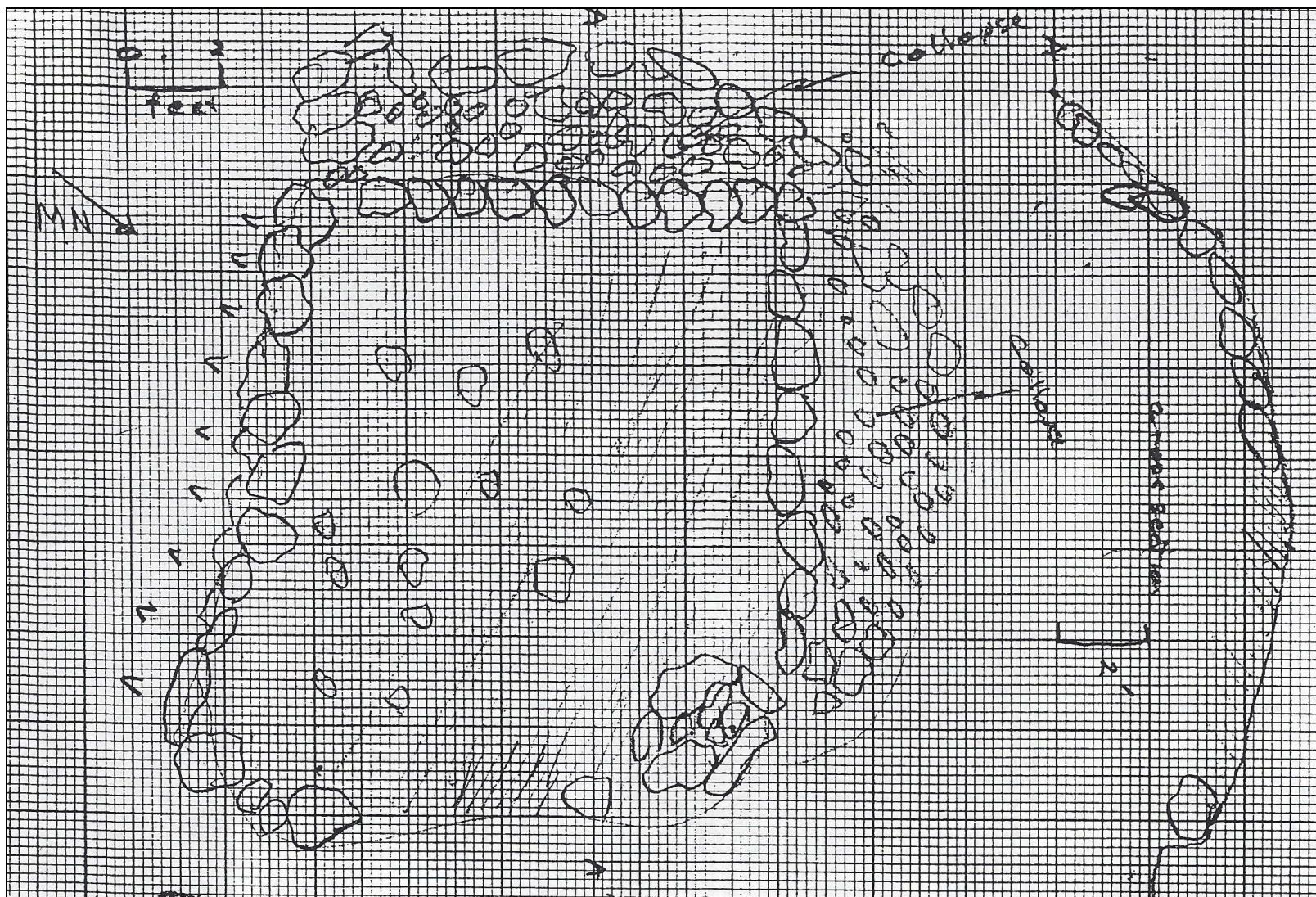
**SIHP #10012 (CSH SITE 10)**

**DESCRIPTION:** This site is an oval shaped mound [platform] 26 feet long and 12 feet wide with a maximum height of 4 feet (Figure 2). There is no clearly defined level upper surface, paved terrace or rock alignments. The surrounding area has been bulldozed adjacent to the site on all sides except the south side. The site appeared to have been disturbed by this grading and had rocks pushed onto it from the north side.

**EXCAVATION RESULTS:** The upper 2 to 3 feet of rock fill was removed from the mound and a rectangular alignment measuring 12 by 15 feet was exposed. At the base of the rock fill and partially burying the stone alignment was a stratum of light brown silt loam containing undecomposed organic debris in the top layer. This stratum, designated stratum I, contained basaltic glass, bone and coral artifacts, and adze flakes. The unconsolidated, mixed nature of the sediment immediately underlying it post date the construction of the mound and are the result of activity from above. On the *makai* or west side of the site are two stone cupboards with a corbelled construction. These cupboards measure 2 feet in diameter and the interior spaces are one foot high. They appear to be contemporaneous with the construction of the rectangular alignment.

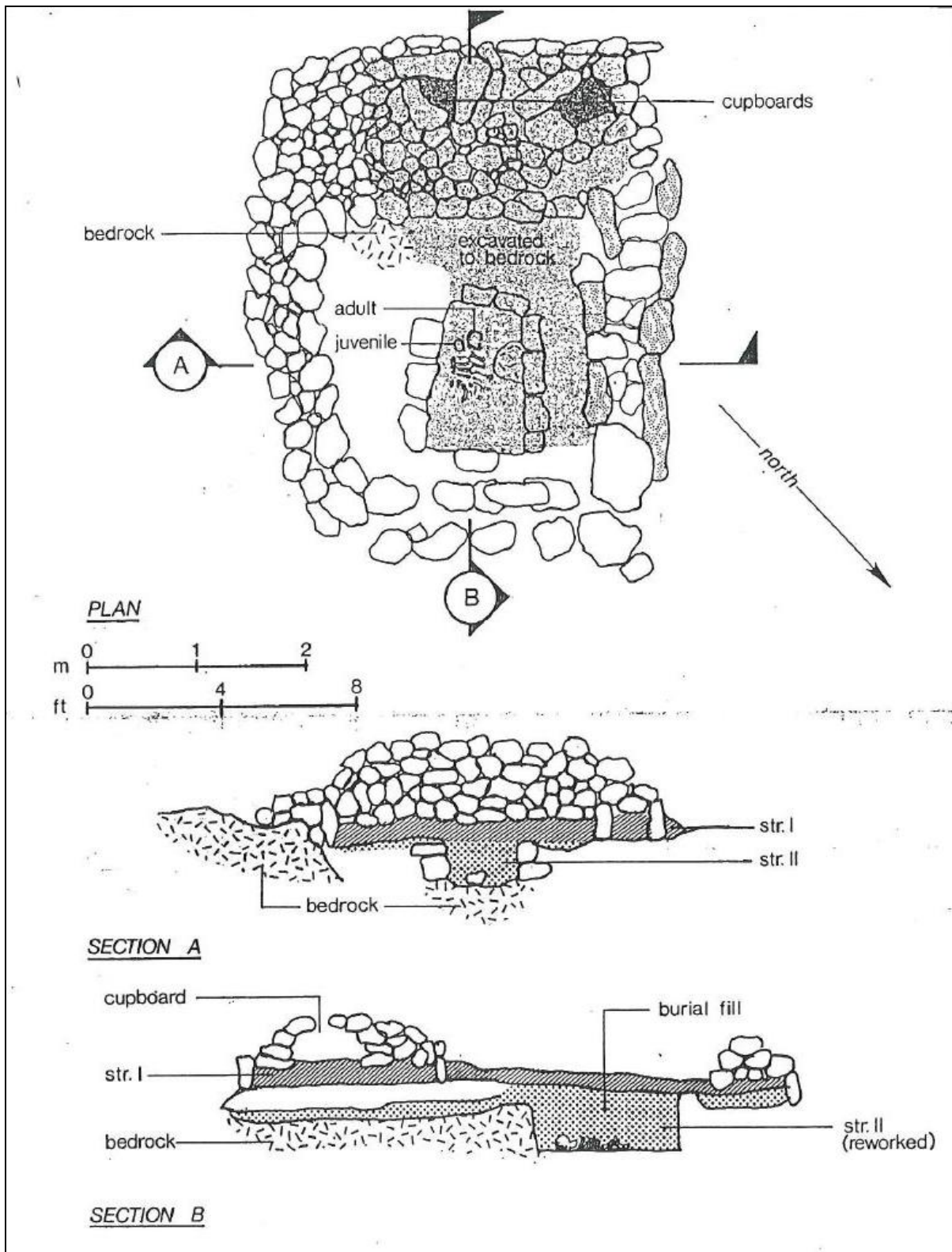
After the exposure of the rectangular alignment and the cupboards the next step was to excavate the interior of the rectangular alignment. Directly underlying Stratum I and distributed in a fairly uniform thickness in the alignment interior and under the cupboards was a second stratum, designated Stratum II. This is a light grey unconsolidated silt loam which contains wood ash and cultural material including stone, shell and bone artifacts and midden. As this stratum was excavated a 3 foot wide and 5 foot long stone crypt was exposed. The crypt consisted of a rectangular arrangement of squared boulders. The fill of the crypt was removed (Stratum II) and the skeletal remains of two individuals was uncovered at a depth of 2 feet below the top of the crypt and resting directly on bedrock. Two skulls were lying 1 inch apart at the northeast end of the crypt and in both cases articulated to the vertebrae. The skull on the north side was of an adult female and is described first below.

[Hammatt et al. 1992:64]



**Figure 1:** Site 10011 (CSH Site 9) Plan View Map (Hammatt et al. 1992:30).





**Figure 2:** Site 10012 (CSH Site 10) Plan View Map and Excavation Profiles (Hammatt et al. 1992:65).

The skull was in excellent preservation except for an anomalous circular shaped region of decay in the posterior parietal. The decay originated in the interior of the cranium and had led to the development of a perforation in the left parietal. Although this has not yet been confirmed by a forensic expert, it is characteristic of the effects of tertiary syphilis on Crania. The area of decay is localized and does not appear to be the result of post internment decay which is not evidenced anywhere else on the skeleton. All upper and lower dentition are present with one anomaly - the second right molar contains an extra side cusp. The incisors have a slight "shovel shape". All three molars are fully erupted and show slight even wear indicating an individual in the early to mid twenties. The unfused cranial sutures particularly the coronal suture also show a mature but young age. As mentioned, the skull was articulated to the vertebrae and the scapulae, the clavicles and the pelvis were all in articulated position. An examination of the sacrum and hip bone show characteristics of a female including wide: sciatic notches and a flat and abruptly angled sacrum. All long bones were absent including tibia, fibulae ulna, radius and humerus. However, the articulated hands and feet had been placed on the pelvis with fingers and toes pointing upwards. The only way that the long bones could be removed while the fingers and toes were still articulated would be before the flesh had decomposed. However, there was no sign of cutting at the separated joints.

The skeleton of the child immediately to the south was completely articulated and semi flexed. All skeletal parts were present but were in a partially decomposed state. The contrast with the state of preservation of the adult skeleton is explained by the delicate nature of the immature bones compared to those of an adult. It is clear from the stratigraphic context that both skeletons were buried at the same time. Although it was impossible to determine the sex of the child because of the crumbling skeletal parts, the dentition was preserved in the mandible. The first molar had partially emerged indicating a child between the age of 4 and 6. There were no anomalies observed in the skeletal parts. A summary of the stratigraphic events which occurred at the site are as follows:

1. An enclosure was constructed with roughly stacked boulders on 3 sides and a double alignment of vertical slabs on the other.
2. The enclosure was occupied and used for every day work activities and food consumption. This resulted in the deposition of Stratum 11 which includes stone adze fragments and shell and bone artifacts.
3. A stone lined crypt was constructed at the base of the Site and intrusive into the occupation deposits of Stratum II.
4. Two human skeletons were interred in the crypt, one child (6i~6 years) and one adult female (18-25 years). Before the adult female was interred and while she was still with musculature her long bones were removed and her separated hands and feet were placed on her pelvis.

5. Following the interment of the burial, the crypt was filled and covered with reworked deposits of Stratum II. The two cupboards were constructed on the *makai* side of the crypt possibly for the purpose of marking the burial site.
6. Stones were piled on the crypt and on the cupboards to create a level living surface and the site was once again occupied resulting in the deposition of Stratum I which filtered through the rock fill.
7. During modern bulldozing of the area around the site rocks were piled on the top and sides giving what was a level platform a mound like appearance.

The significant aspect of this site is that if the adult female did actually carry syphilis and this disease is considered to have been introduced to Hawaii by Captain Cook in 1778, then the burial and overlying occupation must date to the post contact period. However, with the large amount of material excavated and screened from this site not one object indicating a post contact age was found. Either the site dates from the earliest known contact before foreign objects were dispersed or syphilis was present in Hawaii before Cooks Landing. This question can only be answered through charcoal and glass dating.

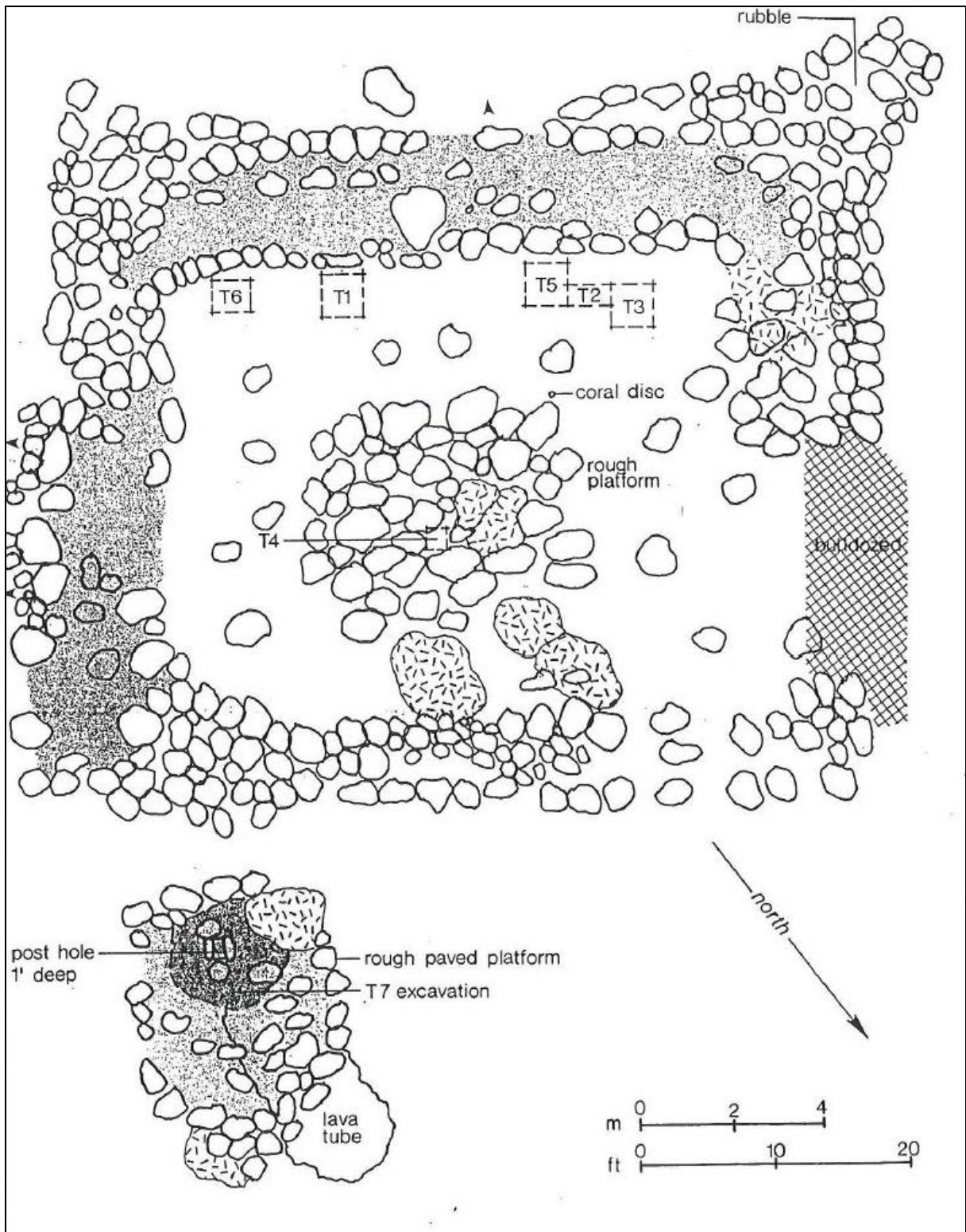
The other unusual feature of this site is the manner in which the skeleton was handled after death. Although it is common with Hawaiian burials to have particular skeletal parts missing, to our knowledge this is the only known case of dismembering limbs and leaving the articulated hands and feet. The final aspect is the apparent complexity of the stratigraphy which indicates multiple use of the site - 2 phases of occupation separated by a burial. Such multiple use is uncommon for upland sites in Kona.

[Hammatt et al. 1992:64-68]

Beta 9214, Site 10, Trench 1, 30-40 cmbs, associated with burial, A.D. 1830±50 (Hammatt et al. 1992:107).

#### **SIHP #10013 (CSH SITE 11)**

DESCRIPTION: Site 11 is a large (60 feet by 60 feet exterior dimensions) nearly square enclosure constructed on almost level ground (Figure 3). The enclosure walls range from five (5) feet wide on the *mauka* side to nearly ten (10) feet wide on the *makai* side where the outside facing is three (3) feet high relative to the exterior ground surface on the *makai* side of the structure. The enclosure walls were probably higher originally but at present they appear to have been knocked down by previous bulldozing operations. The enclosure interior (measuring 35 feet *mauka-makai* by 45 feet north-south) is predominantly dirt with a rock platform about 20 feet square situated near the center of the interior. Immediately *mauka* (5 feet) of the southeast corner of the enclosure is a low, boulder platform about 15 feet by 20 feet. This structure also appears to have been crossed over by a bulldozer. A notable feature in this structure is a hole approximately one (1) foot square and one (1) foot deep. It is neatly formed by small slabs set on edge. [Hammatt et al. 1992:68]



**Figure 3:** Site 10013 (CSH Site 11) Plan View Map Showing Test Units (Hammatt et al. 1992:69).

EXCAVATION RESULTS: Close inspection of the dirt surface in the interior of Site 11 showed that the *makai* area contained a dark grey to black dirt while in the *mauka* portion the dirt layer was a reddish brown, generally shallow with some parts of the bedrock exposed. The *makai* portion of the site was chosen for the first excavation on the basis of sediment color (grey to black sediments in sites usually being a good indicator of human activity and potential depth. A total of 4.5 square meters (Trenches 1, 2, 3, 5 and 6) were excavated adjacent to the *makai* wall. Trenches 1 and 6 established the presence of a single cultural layer up to 30 cm. thick overlain by 10 cm. to 20 cm. of modern AI horizon. These two (2) trenches produced six (6) basaltic glass flakes, a polished adze flake and two (2) coral file fragments.

Trenches 2, 3 and 5 adjoin one another and are situated in the northwest corner of the site interior. They defined the limits of a large rock lined hearth area with multiple ash lens contained in it. A substantial amount of midden material was present in the hearth (Refer to Table 8). A total of 33 items listed as artifacts included a one piece bone fish hook fragment, a piece of worked mammal bone, coral file, saw and abrader fragments, *wana* file fragments, polished adze flakes and basaltic glass flakes. Trench 4 was excavated into the platform in the center of the structure. Bedrock was present at a depth of only 20 cm. below the platform surface, that being at the level of the dirt surface of the site in the other trenches. Some midden was present in the gaps in the bedrock and one polished adze flake and one basaltic glass flake were also recovered from trench 4.

[Hammatt et al. 1992:68]

A final pit (Trench 7) was excavated in the platform just *mauka* of the enclosure. This involved removal of rocks to a depth of two (2) meters where a capped off entrance to a lava tube was found. The lava tube five (5) feet wide was accessible for fifteen (15) feet in a *mauka* direction. It was fully explored and was found to exhibit no signs of human use. Slight flow of cool air through the tube and the absence of cultural material within the tube suggest that its primary function may have been a source of ventilation for the platform built over it. On the basis of size, thickness of the cultural layer, complexity of the structural remains and the variety of cultural items present Site 11 is the best example of a semi-permanent or permanent occupation site in the entire study area. The two (2) platforms (one inside and one outside of the enclosure) suggest the former presence of pole and thatch structures. The excavations clearly show the primary work area in the site was along the *makai* edge of the enclosure.

[Hammatt et al. 1992:71]

#### **SIHP #10017 (CSH SITE 15)**

This is a rectangular platform measuring approximately 3 m. (10 feet) by 6 m. (20 feet) and is 1.5 m. (5 feet) high on the downslope side. Because of the design of the stone structure and its proximity to a cattle road it may be a disused cattle loading chute.

[Hammatt et al. 1992:17]



**SIHP #10018 (CSH SITE 16)**

This is a rectangular enclosure with core-filled walls .6 m (2 to 3 feet) high and 3 m. by 6 m (10 by 20 feet) across the interior dimensions. The walls are 1.8 to 2.4 m. (6 to 8 feet) thick and with much collapsed rubble. This site may be a homestead of historic age. [Hammatt et al. 1992:17-18]

**SIHP #10019 (CSH SITE 17)**

DESCRIPTION: This site is a complex of 6 rectangular and oval stone mounds averaging 10 x 15 feet with the height of the central part of the mounds of 2-3 feet. Although the mounds are dome shaped in cross section there is curbing of large slab uprights along the perimeters. These features were labeled features A to F.

TEST RESULTS: Three of the mounds were cross sectioned with one meter wide trenches oriented *mauka-makai*. All of these trenches were excavated to bedrock with no midden material or artifacts occurring. However, in the excavation of feature B a rusted metal file was discovered under a large slab at the base of the mound. This find leaves little doubt that this feature is historic in age and this conclusion is applied to all other features in this complex. The location of these features adjacent to the stream channel indicates that they are stone clearance mounds created by the coffee planters and are part of a large complex of similar features which extend mauka along the stream bed. [Hammatt et al. 1992:27]

**SIHP #10020 (CSH SITE 18)**

This is a rough platform with a rounded top surface measuring approximately 2.4 m. by 3 m. (8 by 10 feet) (Hammatt et al. 1992:18).

**SIHP #10033 (CSH SITE 112)**

This large area characterized by large planting plots is associated with small mounds and platforms from field clearing. It is an extensive area undisturbed by bulldozing activities. This site is situated near the northeast corner of the study area. Based on historic information and extensive coffee trees this site is interpreted to be the remains of historic coffee farming activities. [Hammatt et al. 1992:18-19].

**SIHP #10049 (CSH SITE 216)**

Site 10049 consists of a few large (about 6.1 m. to 2.2 m.; 20 feet by 40 feet) planting terraces demarcated by low boulder alignments. This site is similar to site 10035 in that large terraces are the most important features in an extensive complex of planting plots. [Hammatt et al. 1992:20].

**SIHP #10067 (CSH SITE 232)**

DESCRIPTION: Site 232 consists of a number of small terraces and roughly leveled areas (3 feet to 8 feet across) covering the south slope of a brick-a-brack *pu 'u* (hill) (Figure 4). "Holualoa School" stream runs along the south flank of the *pu 'u*. A substantial wall, at least sixty (60) feet in length, runs along the north bank of the stream. The mauka

(upslope) corner of the wall serves as the facing for a small black dirt covered terrace where basaltic glass flakes can be observed on the dirt surface.

**TESTING RESULTS:** A one (1) meter square trench was excavated in the black dirt covered terrace where basaltic glass flakes were observed. The test trench contained large quantities of basaltic glass flakes (avg. 64 flakes/10 cm. level) to bedrock at a maximum depth of 30 cm. Midden material on the other hand was sparse consisting of some shell fragments and very few pieces of fish and mammal bone. A small hearth lens (30 cm. diameter/20-30 cm. depth) in the northwest corner of the test trench provides a charcoal sample for radiocarbon analysis. This terrace clearly was used as an occupation site for specialized Work. Other terraces in the proximity were deemed to be in all probability for agricultural use.

[Hammatt et al. 1992:48]

Beta 9217, Site 232, Trench 1, 20-30 cmbs, less than 130 before 1950, modern (Hammatt et al. 1992:86).

**SIHP #10068 (CSH SITE 233)**

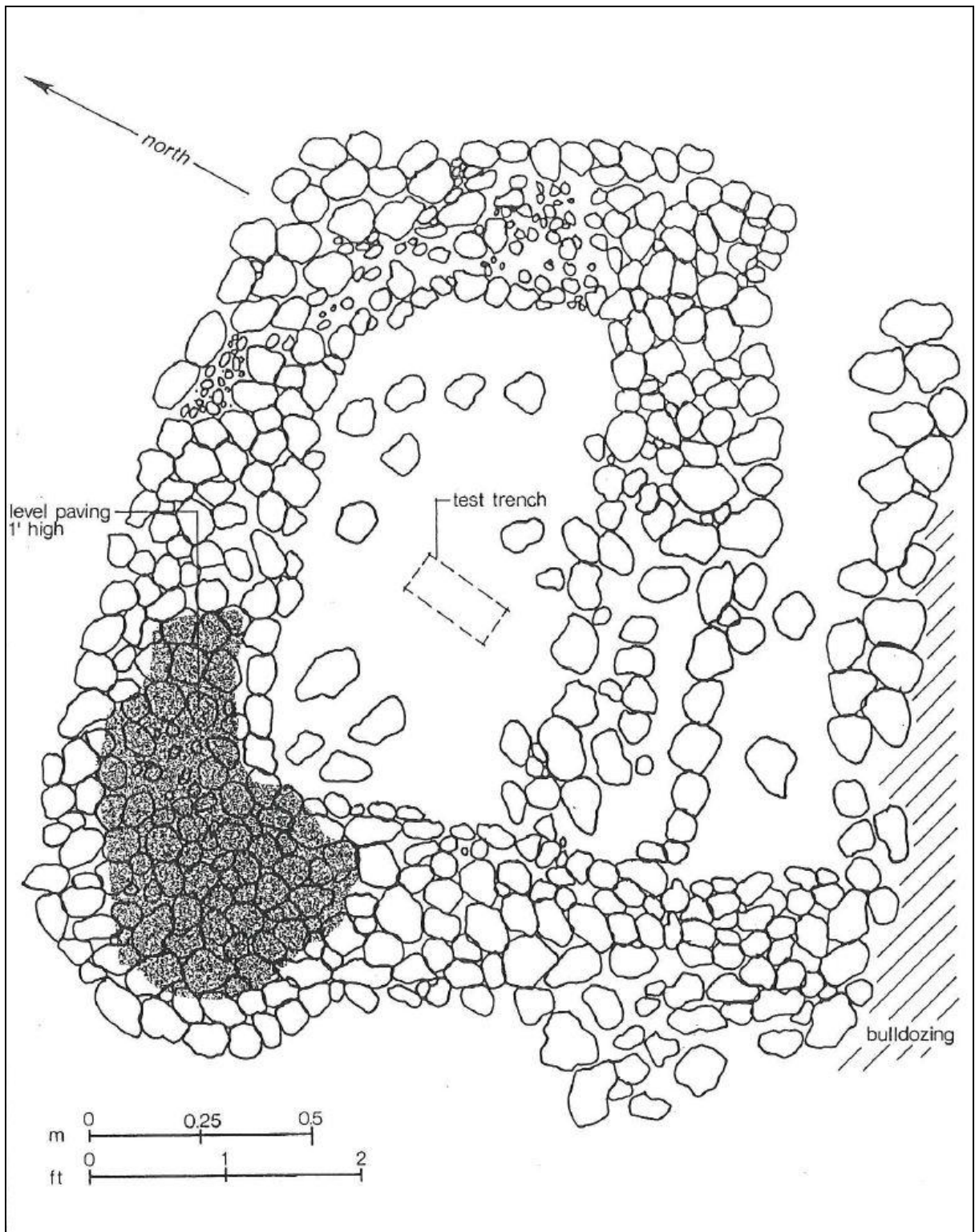
**DESCRIPTION:** This site is a small rectangular enclosure 14 feet long and 12 feet wide with a maximum height of 1 foot (Figure 5). The internal dimensions are 8 feet by 5 feet. The walls of the enclosure have been collapsed and spread by bulldozing but a portion of the interior alignment remains along the north side.

**TESTING RESULTS:** A one meter by 50 cm test trench was placed in the approximate center of the enclosure. This trench was excavated to bedrock at a depth of 35 cm. Although there was no distinct cultural deposit, a small amount of midden material was found including cowrie, *pipipi*, sea urchin and fragments of fishbone. Because of the scarcity of material and the disturbed nature of the deposits the excavation was discontinued. However, the site probably functioned as a habitation enclosure.

[Hammatt et al. 1992:48]







**Figure 5:** Site 10068 (CSH Site 233) Plan View Map Showing Test Trench (Hammatt et al. 1992:50).

**SIHP #10069 (CSH SITE 234)**

DESCRIPTION: Site 234 consists of a rock platform constructed against the south edge of a bedrock bluff overlooking "Holualoa School" stream to the south. The bluff top is roughly level with low linear bedrock outcrops. The site appears to have been scraped over during previous bulldozing leaving the rock platform and possible walls along the edge of the bluff in a poor state of preservation. One small area (about seven (7) feet by ten (10) feet maximum) of the bluff top immediately north of the platform contains a deposit of black soil and was tested by a 50 cm. square trench.

TEST RESULTS: The 50 cm.2 test trench revealed the dirt deposit to be a single stratigraphic unit extending to a maximum depth of twenty two (22) cm. Midden consisted of few shell fragments and very few fragments of bone. Basaltic glass was relatively abundant (avg. 10 flakes/each of four (a) 5 cm. deep levels). A single basalt flake was the only other artifact found. Similarities in site location and cultural content between Site 234 and Sites 232, 103, 221, etc., all of which could be termed "glass sites", indicated an occupation site with a special function probably associated with agriculture. [Hammatt et al. 1992:51]

**SIHP #10070 (CSH SITE 235)**

DESCRIPTION: This site consists of a "U" shaped shelter 15 feet long and 12 feet wide with maximum height of 5 feet (Figure 6). The walls of the structure are well constructed and in excellent condition.

TEST RESULTS: A one meter by 50 cm trench was placed along the back, wall of the site and excavated to bedrock at a depth of 15 cm. No cultural material was located. The comparatively new condition of the stonework of the site and its proximity to other historic features (Site 17) indicates that it is of recent age and probably associated with historic agricultural activities such as coffee growing or grazing. [Hammatt et al. 1992:51]

**SIHP #10071 (CSH SITE 237)**

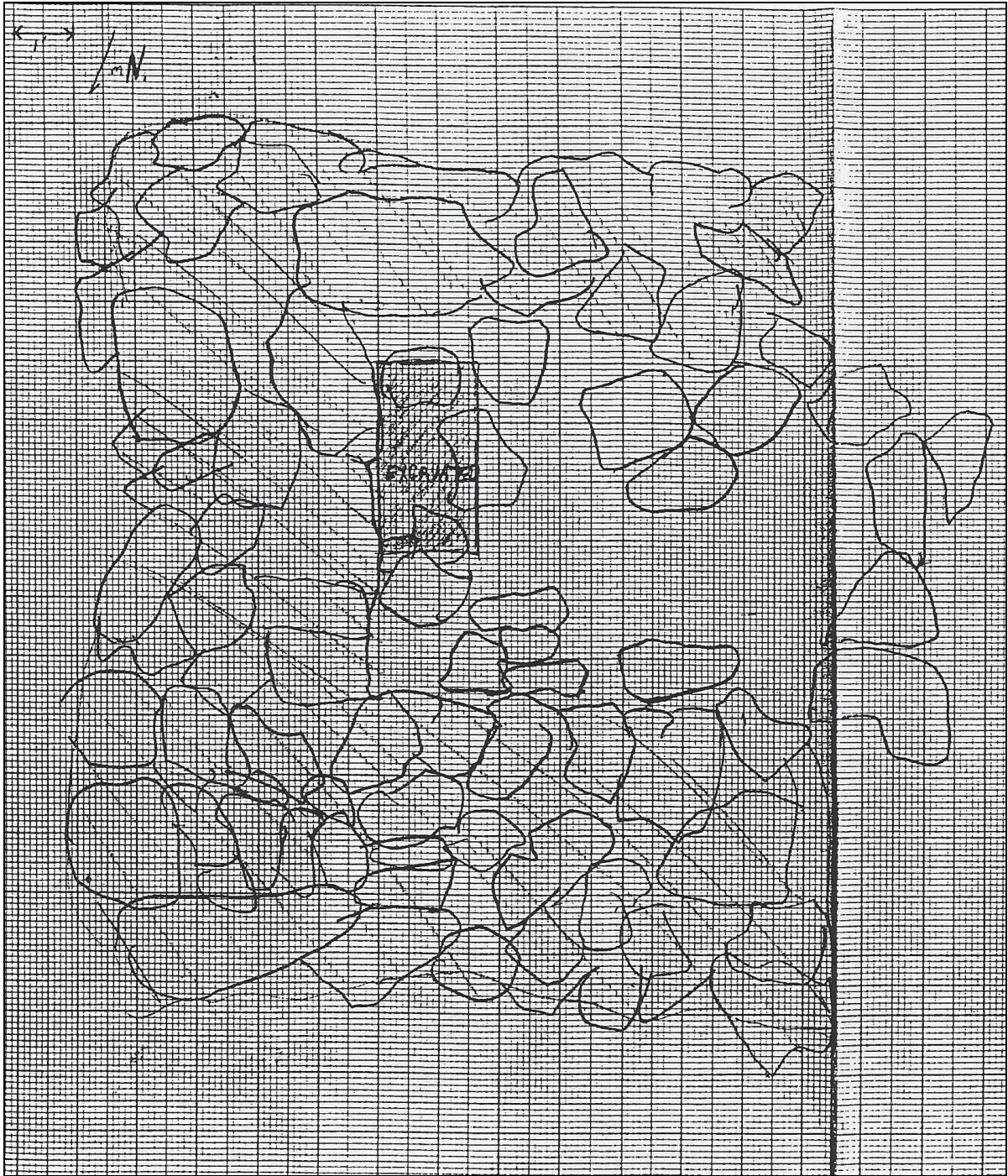
This is another rectangular platform measuring fifteen (15) feet by twenty two (22) feet with the long axis oriented *mauka-makai* (Hammatt et al. 1992:23).

**SIHP #10072 (CSH SITE 238)**

DESCRIPTION: This site consists of a large (roughly 25 feet by 36 feet) bluff and a small rock mound (about 12 feet square) adjacent to the north of the *pu'u* (Figure 7). The surrounding area displays remnants of low walls along bedrock outcroppings that separate relatively level dirt terraces about 25 feet square or larger.

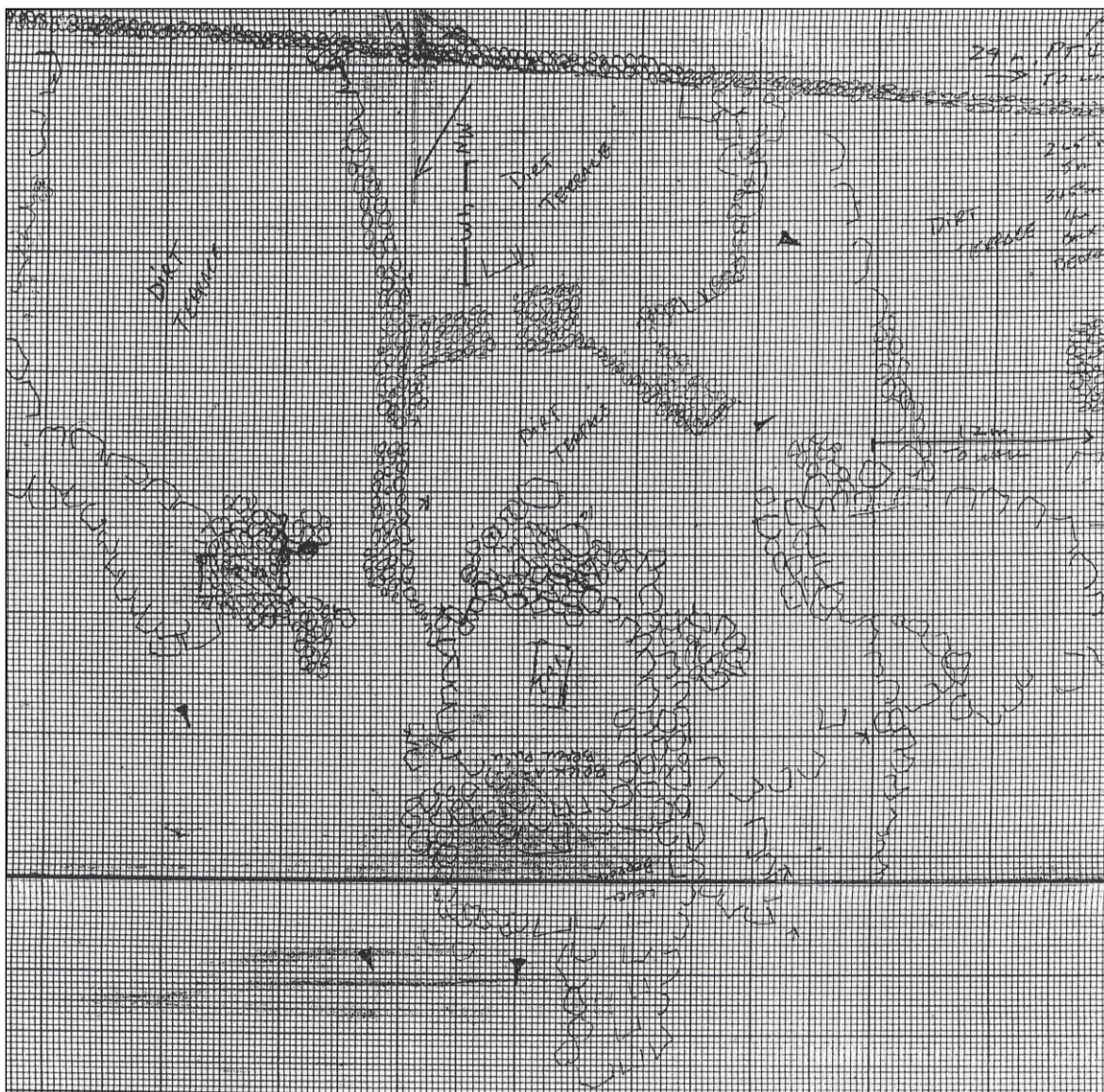
TEST RESULTS: Test Trench 1 (1.5 meters by 2 meters) was excavated into the middle of the top of the bluff to a depth of 0.5 meters. This consisted of removing basalt boulders and cobbles less than 1 cm. of soil deposit was observed overlying solid bedrock and no midden nor artifacts present. This *pu'u* was thus determined to consist almost completely of a natural geological formation used probably as a place to deposit rocks cleared from the surrounding field areas. [Hammatt et al. 1992:51]





**Figure 6:** Site 10070 (CSH Site 235) Plan View Map (Hammatt et al. 1992:52).





A second trench (Trench 2) was excavated into the smaller rock mound to the north. This trench was begun by dismantling a two (2) meter wide section of the south face of the platform, extending it two (2) meters into the structure. A dirt deposit of up to 40 cm was excavated and found to contain some *C. caputserpentis* and *wana* (*echinoid*) fragments. No artifacts or other sign of more than the most transitory human activity was observed at either of the trenches.

[Hammatt et al. 1992:54]

**SIHP #10073 (CSH SITE 239)**

Site 239 consists of two (2) high, terraced platforms measuring eight (8) feet high on the downhill (*makai*) facing. These appear to be historic structures, probably cattle loading chutes or ramps (Hammatt et al. 1992:23).

**SIHP #10074 (CSH SITE 240)**

DESCRIPTION: This site consists of a rectangular house foundation which measures 28 feet long and 27 feet wide (Figure 8). The maximum height of the remaining walls is 4 feet on the south side. The foundation is neatly faced on the exterior side with core filling. In the interior there is the remnant of a north-south partition with a cobble paving on the west side. The west (*makai*) wall of the foundation has a double facing which may have been constructed as a lanai. The site is situated on a prominent bluff above the stream bed and within a few hundred feet of the railroad berm. The slope to the south and west has mature ironwood trees planted in lines and a small pen connects to the northwest. A section of galvanized roofing lies at the southeast corner.

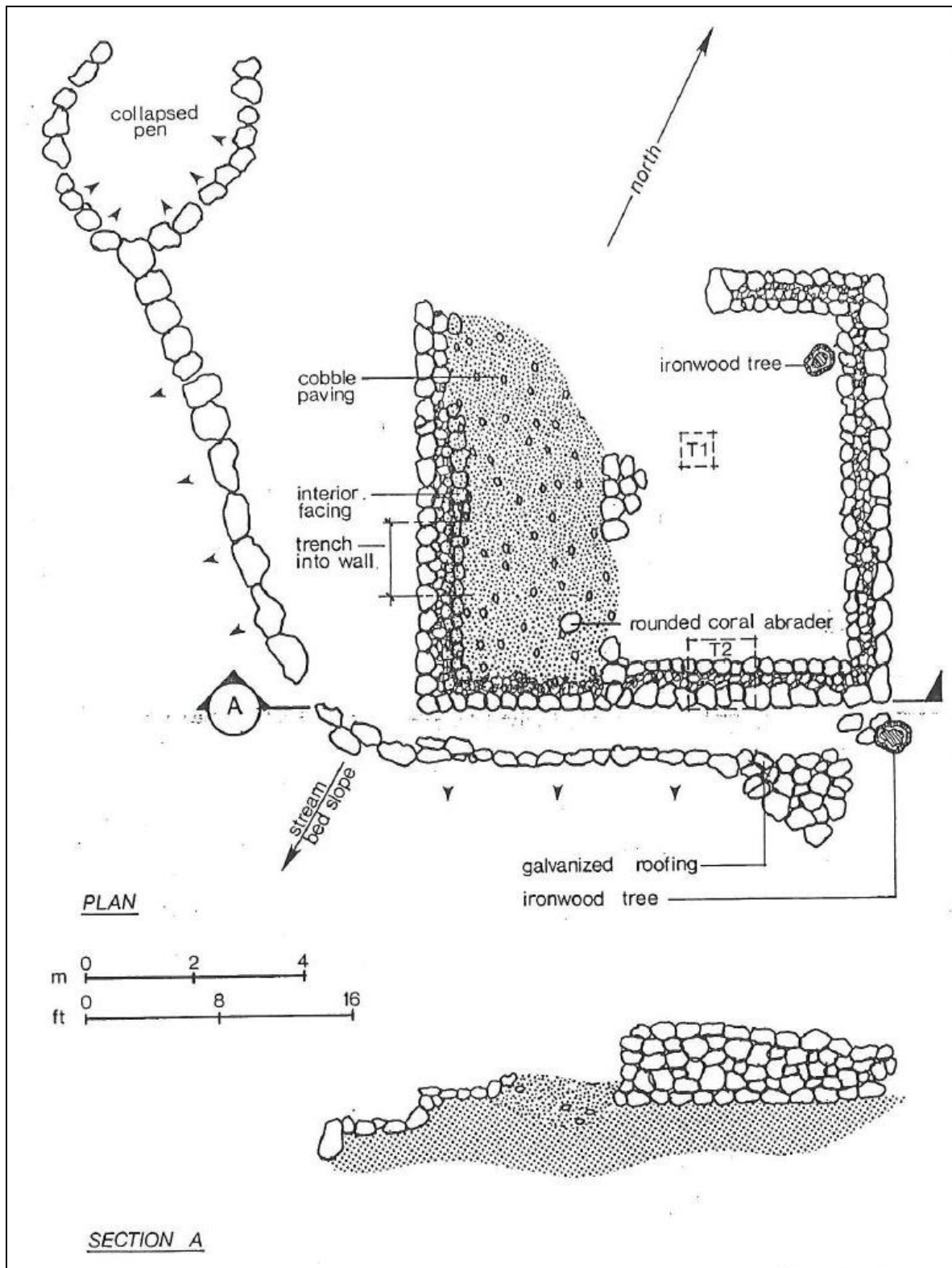
TEST RESULTS: A 50 cm square test trench was placed in the soil deposit in the south partition of the foundation and was excavated to sterile Pahala ash at a depth of 35 cm. The trench yielded a few fragments of cowrie shell and one basaltic glass flake. These finds are not consistent with the clearly historic age of the foundation and may represent the scattered remains of a prehistoric occupation. A coral abrader was located on the surface of the cobble paving to the north. In addition to this trench a section of the facing of the west wall of the foundation was dismantled. Scattered in the rocks were bottle glass, glazed ceramic sherds, wire nails and fragments of redwood. This foundation, most likely represents a small dwelling or work shed associated with coffee farming. Coffee trees still remain in the stream bed to the south.

[Hammatt et al. 1992:54]

**SIHP #10075 (CSH SITE 241)**

This structure is a large enclosure probably historic and is considered to be pig pen based on similar sites documented as pig pens by informants. The enclosure is roughly fifteen (15) feet by thirty (30) feet, long axis oriented north-south, with walls five (5) to six (6) feet high. The mauka wall has a low (one foot) stone slab "post and lintel" opening at its base a few feet from the northeast corner of the structure (Hammatt et al. 1992:23).





**Figure 7:** Site 10074 (CSH Site 240) Plan View Map Showing Test Units (Hammatt et al. 1992:55).

**Enclosure 5: 1993 Gamrex, Inc. Letter to SHPD**

*Project Planners Hawaii*

75-127 Lunapule Road, Suite 14  
Kailua-Kona, Hawaii 96740  
Telephone: (808) 326-7204  
FAX: (808) 329-1202



February 8, 1993

Mr. Edward Halealoha Ayau, Esq.  
State Historic Preservation Division  
Department of Land & Natural Resources  
State of Hawaii  
33 South King Street  
6th Floor  
Honolulu, Hawaii 96813

Re: Gamrex, Inc.  
Reburial Site Selection For Hawaiian Skeletal Remains,  
Tax Map Keys: 7-6-21:4, 9-13, 15-17, Third Division,  
Holualoa 1 & 2, North Kona, Hawaii

Dear Mr. Ayau:

I am in receipt of Mr. Don Hibbard's letter of January 27, 1993, and am writing to clarify some of the points in question in his letter and from Gamrex's standpoint.

I received your form for the legal notice and it is being published in the publications requested by you to our Kona representative last week. Thank you for the format as we are not usually familiar with this type of matter. Proof of publication from the various papers will be sent to you upon receipt by Gamrex.

In respect to the two burials found together in the North portion of the property and your questions regarding it:

- A. Reference is made to the Archaeological Survey done by Cultural Surveys Hawaii on the subject property. You will find detailed maps therein showing the exact location of the burial site in question. Marc Smith of your office also is in possession of map.
- B. Last summer (August, 1992) Marc and myself attempted to find the site by walking mauka from Queen Kaahumanu Highway through the lower portion of the property up to where we thought the site should be. We used the map made by CSH. We were unsuccessful in finding the site due to the dense growth which covered the ground and any features that would help us in finding the site. In meeting the burial council members, I don't feel any of them would be up to locating the site in its present

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Mr. Edward H. Ayau  
State Historic Preservation Division  
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overgrown state. Marc and I agreed at the time, that we would attempt to find the site again during the winter dry season in Kona. To date the rainfall has been enough so site conditions haven't changed.

C. Should conditions change, I will be happy to assist Marc, and should Marc decide that he wants to look for it alone, you have permission from Gamrex to enter onto the property at any time, at your risk, to find the subject site. Since it is difficult to see your footing, I strongly suggest at least two (2) individuals are used. Please contact me in advance of any attempt at locating the site.

During the field work done back in early 1983, I was present for most of it. My recollection(s) of what transpired were as follows:

A. After submission and review of the CSH reconnaissance survey, Mr. Wendall Kam (DLNR) and Ms. Virginia Goldstein (County of Hawaii) set forth the scope of work required in the field (1982).

B. Field work by CSH began in the first week of January, 1983.

C. After a month or so of field work, both Mr. Kam and Ms. Goldstein visited the site and were taken on a tour of the sites recorded in the reconnaissance survey. It was determined at that time that many of original sites were not really historic in nature (i.e. bulldozer tailings etc.). They were deemed not worthy of further investigation.

D. By then, both burial sites had been located and the remains removed. Both parties agreed that CSH should further dismantle both sites completely. In addition, when a bulldozer became available, CSH would return to Kona and supervise a dismantling of the bedrock to see if any further burials and/or human habitation existed in subsurface tubes. CSH did return and a complete ripping of the surface of both sites was completed under the supervision of Dr. Hammett. A D-8 bulldozer was used for this work. No further burials and/or human habitation was evidenced in either site. Both sites were left in the condition they were in after the bulldozing work was completed.

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E. Subsequent to that, in 1990 and 1991, the South site within Unit 1B of the existent subdivision was covered by what is known as Leilani Street which connects to the Sunset subdivisions to the South. This was shown to Marc on his first visit to the site in August of 1992.  
F. The North burial site remains as before described.

Based on this information, I hope that questions posed in Mr. Hibbard's letter are clarified. It is my further opinion, that should we be able to find the site where two burials were found, the site itself will be in such a state of disarray that it would not be in any condition to serve as a reburial site. Further more, all the lands surrounding the North (two burial) site are zoned RM 5 by the County which allows for multi-family residential usage (condominiums). A burial site within a condominium project provides difficulties in definition, maintenance and visitation(s). Privacy also is reduced due to the nature of these types of developments.

We should also realize that when this work was done, there were no clear cut laws regarding burials and relocation of remains. Gamrex, Inc. respects the burial council and present legislation. It wants to work with your office and the council in the reburial process.

Based on the information contained herein, I respectfully and humbly suggest the following:

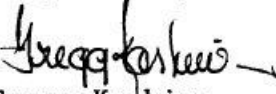
- A. The site shown to the Hawai'i Island Reburial Council on January 21, 1993, takes into consideration many of the features present in other burial sites such as:
  - 1. Location on a bluff with a view of the coastline.
  - 2. Privacy with accessibility.
- B. The site approved for the reinterring the burial found in the South site, be used also in reinterring both the burials from the North site. The setting is pleasant and tranquil. It is within the single family zoned area of the development which by nature makes it more private than the lands zoned multi-family to the North. It will have an access road leading to it from the Kilohana Street extension. It is immediately accessible to men

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and equipment. Development of the lot located on the South is complete and future development will not be an unknown factor.

Thank you for your assistance to date and we look forward resolving the reburial(s) in the near future. Please contact me with any questions you may have.

Respectfully submitted,

  
Gregg Kashiwa

cc: Gamrex, Inc.  
Cultural Surveys Hawaii  
Land Use Commission  
Planning Department