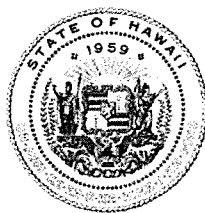
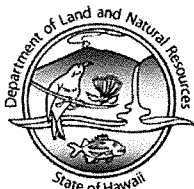


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September 22, 2017

Michael Atherton
Waikapū Partners LLC
1670 Honoa'pi'ilani Highway
Wailuku, HI 96793
Email: athertonisland@gmail.com

IN REPLY REFER TO:
Log No. 2017.02060
Doc No. 1709MBF15
Archaeology

Dear Mr. Atherton,

SUBJECT: **Chapter 6E-42 Historic Preservation Review –
Archaeological Inventory Survey Report for Several Parcels of Land
Situated within Waikapū Ahupua'a; Wailuku District Pū'ali Komohana Moku
Waikapū Ahupua'a, Wailuku District, Island of Maui
TMK: (2) 3-6-002:003; (2) 3-6-004:003, 006, 007**

Thank you for the opportunity to review the subject submittal titled, *Draft Archaeological Inventory Survey Report for Several Parcels of Land Situated within Waikapū Ahupua'a; Wailuku District Pū'ali Komohana Moku; TMK: (2) 3-6-002:003; (2) 3-6-004:003, (2) 3-6-004:006; and (2) 3-6-005:007* (Guerriero et al., September 2017). Revisions to the archaeological inventory survey (AIS) report were requested by the State Historic Preservation Division (SHPD) on August 10, 2017 (Log No. 2013.5793, Doc No. 1708MBF04). The revised report was received by the SHPD on September 15, 2017.

Under contract to Waikapū Partners, LLC, Archaeological Services Hawai'i, LLC (ASH) conducted an archaeological inventory survey (AIS) of approximately 503 acres. The original AIS was initiated by the developer in advance of the project, and the draft AIS report was attached to a draft environmental impact statement (DEIS) submitted to the SHPD on October 3, 2013; no record was found that SHPD reviewed the DEIS.

Waikapū Partners, LLC has landholdings for the subject project totaling 1,576 acres. As stated above, only 503 of the 1,576 acres are covered by the AIS. The remaining 1,073 acres within a portion of TMK: (2) 3-6-002:003 and (2) 3-6-004:003 are currently in small-scale agricultural production, and will remain as such, within the State Land Use Agricultural District. The 1,073 agricultural acres are not covered under this AIS report.

Furthermore, 800 of the 1,073 acres of the current small-scale agricultural land will be preserved in perpetuity for small-scale agricultural use. SHPD stipulates that the applicant shall address any impacts to historic properties related to the 1,576 subject project and that SHPD shall have the opportunity to comment should (1) future development be proposed within the agricultural lands outside the preservation easement, requiring an entitlement change or Special Use Permit (SUP); or (2) there is a change in the scope of work for the 503 acres or if any projects are proposed within the remaining 1,073 acres that were not surveyed, allowing SHPD the opportunity to determine whether a supplemental AIS is warranted to identify the presence or absence of historic properties, including burials, and to ascertain the extent, significance, and potential adverse effects that future development may impose.

The testing strategy of the original AIS consisted of a partial-extent pedestrian survey, and subsurface exploration with 150 randomly-placed, mechanically-excavated test trenches. Four historic properties were identified and

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designated with State Inventory of Historic Places (SIHP) site numbers: Sites 50-50-04-7881, 50-50-04-7882, 50-50-04-7883, and 50-50-04-7884. These four sites are comprised of nineteen component features, most of which are related to sugarcane cultivation. One previously identified historic property, known as the Waihe'e Ditch (Site 50-50-04-5197), is extant in the survey area. Features 1-18 of Site 50-50-04-7881 consist of concrete-lined ditches, sluice gates, and dirt culverts with concrete-lined headwalls. Site 50-50-04-7882 is a moderately deteriorated "L-shaped" retaining wall. Site 50-50-04-7883 is a World War II-era bunker, and Site 50-50-04-7884, Features 1-3 are described as secondary deposits of historic materials recorded at three separate localities within the survey area. The subsurface testing strategy did not identify any buried historic properties. A preservation plan (PP) will be developed for Sites 50-50-04-7881 (irrigation features) and 50-50-04-7883 (bunker).

Pursuant to Hawaii Administrative Rules (HAR) §13-284-6, intended for the evaluation of significance of documented historic properties, Sites 50-50-04-7881, 50-50-04-7882, and 50-50-04-7884 are assessed as significant under Criterion d, as they have yielded, or have the potential to yield, significant information pertaining to the history of the area. Site 50-50-04-7883, the World War II bunker, is considered significant under three criteria: Criterion a, association with an important historical event; Criterion c, distinctive characteristics of construction; and Criterion d, possessing significant information pertaining to the history of the area. The WWII bunker, is quite unique in that it is one of the last remaining examples of this type of architecture in relatively good condition, on the island of Maui. The draft AIS report indicates that the proposed project will affect the historic scatters associated with Site 50-50-04-7884, and likely also Site 50-50-04-5197 (Waihe'e Ditch). In addition, it is noted that portions of the project area are located within an area which may contain human burials; burials have been documented in the area.

The draft AIS report indicates one or more historic properties will be affected by the subject project, the project effect recommendation is "Effect, with agreed upon mitigation commitments". The agreed upon mitigation commitments are (1) data recovery in the form of archaeological monitoring, (2) preservation of Sites 50-50-04-7881 and 50-50-04-7883, and (3) if Site 50-50-04-5197 is impacted, it will be further documented through architectural documentation; the nature of the architectural documentation will be determined in consultation with the SHPD.

The SHPD concurs with the site significance assessments and a project effect determination of "Effect, with agreed upon mitigation commitments". SHPD also concurs with archaeological monitoring, stipulating that archaeological monitoring shall be conducted for all ground disturbing activities.

The revised draft AIS addresses the issues and concerns raised in our earlier corresponds and now meets the minimum requirements specified in HAR §13-276-5. **It is accepted.** Please send two hardcopies of the document, clearly marked FINAL, along with a text-searchable PDF version, to the Kapolei SHPD office, attention SHPD Library.

As stipulated in HAR §13-275-7, when SHPD comments that a project will result in "effect with agreed upon mitigation commitments," then detailed mitigation plans shall be developed for SHPD review and acceptance prior to project work commencing. **SHPD looks forward to** receiving an archaeological monitoring plan (AMP) meeting the requirements of HAR §13-279-4 and a preservation plan meeting the requirements of HAR §13-277.

You may contact Dr. Matthew Barker Fariss at matthew.b.fariss@hawaii.gov, or at (808) 243-4626, for any questions regarding this letter.

Aloha,



Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

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cc: County of Maui Planning
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