

**APPENDIX D: Memo to the SHPD regarding project
APE and current TMK information**



June 29, 2015

Ms. Morgan E. Davis, Lead Archaeologist, Maui Section
State of Hawaii
Department of Land and Natural Resources
State Historic Preservation Division
601 Kamokila Boulevard, Room 555
Kapolei, HI 96707

Dear Ms. Davis,

RE: Comments on the Draft Environmental Impact Statement (DEIS)
for the Piilani Promenade, located in Kihei, Maui, Hawaii at
TMK's: (2) 3-9-001:016,170-174.
LOG NO: 2014.03806
DOC NO: 1409MD41

Thank you for your review of the Archaeological Inventory Survey (AIS) and for meeting with Chris Hart and Partners, Inc. and the project Archaeologist, Mr. Erik Frederickson on Thursday June 18, 2015 to discuss the proposed Piilani Promenade project. A summary of our meeting is provided below.

Area of Potential Effect

The proposed **on-site** development of the Piilani Promenade includes 3 developable parcels, a MECO electrical substation, relocation of the Department of Water Supply waterline and construction of the initial increment of the Kihei/Upcountry Highway through the project area.

In addition, the **off-site** project improvements will include the construction of a 1.0 Million gallon water tank with transmission line, a roadway and utility easement to Ohukai Road and several roadway widening parcels along Piilani Highway in order to improve the intersection of Kaonoulu Street and Piilani Highway.

The 1994 AIS prepared for this property included TMK's 3-9-01:16 and 2-2-02:15 (por.) for a total of 88 acres. Since 1994 the property has been sold and purchased by a new

owner who subdivided the land and new TMK's were assigned to the newly subdivided parcels.

The March 2014 revised AIS report includes the following TMK's for a total of 101.658 acres of total land evaluated for the AIS. **The 101.658 acres includes on and off-site parcels of land that could be affected by the proposed development.** A numbered list of the project components with Tax Map Key is provided below. In addition a site plan with corresponding numbers is attached (See: Exhibit 1 "Site Plan").

	TMK	OWNERSHIP	Description	Acreage
Land owned by PPN/PPS				
Development Parcels				
1	(2) 3-9-01:016	PPN/PPS	Development Parcel Phase 1	30.132
2	(2) 3-9-01:170	PPN/PPS	Development Parcel Phase 2	18.519
3	(2) 3-9-01:171	PPN/PPS	Development Parcel Phase 2	19.539
Kihei-Upcountry Highway lot				
4	(2) 3-9-01:172	PPN/PPS	Roadway Widening Lot	4.898
Piilani Highway Widening Lots				
5	(2) 3-9-01:173	PPN/PPS	Piilani HWY widening lot	0.924
6	(2) 3-9-01:174	PPN/PPS	Piilani HWY widening lot	0.859
			subtotal	74.871
Onsite Easements				
7	no TMK	-	MECO substation	
8	no TMK	-	County waterline relocation	
Land Not owned by PPN/PPS				
Piilani Highway Widening Lots				
9	(2) 3-9-048:122	KENRANES	Piilani HWY widening lot	0.332
10	(2) 3-9-001:148	PACIFIC WEST COMMUNITIES Inc.	Piilani HWY widening lot	0.407
			subtotal	0.739
Offsite Easements				
11	(2) 2-2-02:016 (portion)	Haleakala Ranch Company	Roadway and utility easement	1.119
12	(2) 2-2-02:082 (portion)	Kaonoulu Ranch LLLP	1.0 MG Water Tank transmission line easement	10.646
			subtotal	11.765
Offsite Water Tank				
13	(2) 2-2-02:077 (portion)	Kaonoulu Ranch LLLP	1.0 MG Water Tank site	1.154
			subtotal	1.154
Off site land reviewed for EIS purposes				
Offsite Multi-family				
14	(2) 3-9-01:169	Honuauia Partners	Future affordable Multi-family development	13.129
			subtotal	13.129
				101.658 acres

Kulanihakoi Gulch

The proposed project will not divert water into Kulanihakoi Gulch and therefore no impacts to the gulch are anticipated. A previous project on the same property had been designed to outlet storm water runoff into the Gulch, that plan has been abandoned and the new project proposes to route the same stormwater through the project.

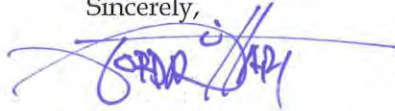
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Relocation of the County waterline

The relocation of the County's existing 36-inch waterline is also part of the proposed project. The waterline currently bisects the properties diagonally, and the proposed realignment will move the 36-inch waterline underneath the proposed East Kaonoulu Street extension, also known as the first segment of the proposed Kihei Upcountry Highway. (See: Exhibit 3 "Waterline Relocation Plan")

Thank you for participating in the environmental review process and taking the time to meet with us. Please feel free to call me or Mr. Brett Davis at (808) 242-1955 or e-mail Brett at bdavis@chpmaui.com should you have any questions.

Sincerely,



Jordan E. Hart, President

ENCLOSURES (3)

1. Exhibit 1 "Site Plan"
2. Exhibit 2 "Proposed Drainage Plan"
3. Exhibit 3 "Waterline Relocation Plan"

CC: Mr. Charles Jencks, Ownership Representative
Mr. Erik Fredericksen, Archaeologist
Mr. Daniel E. Orodener, DBEDT-LUC
Project File 13-029

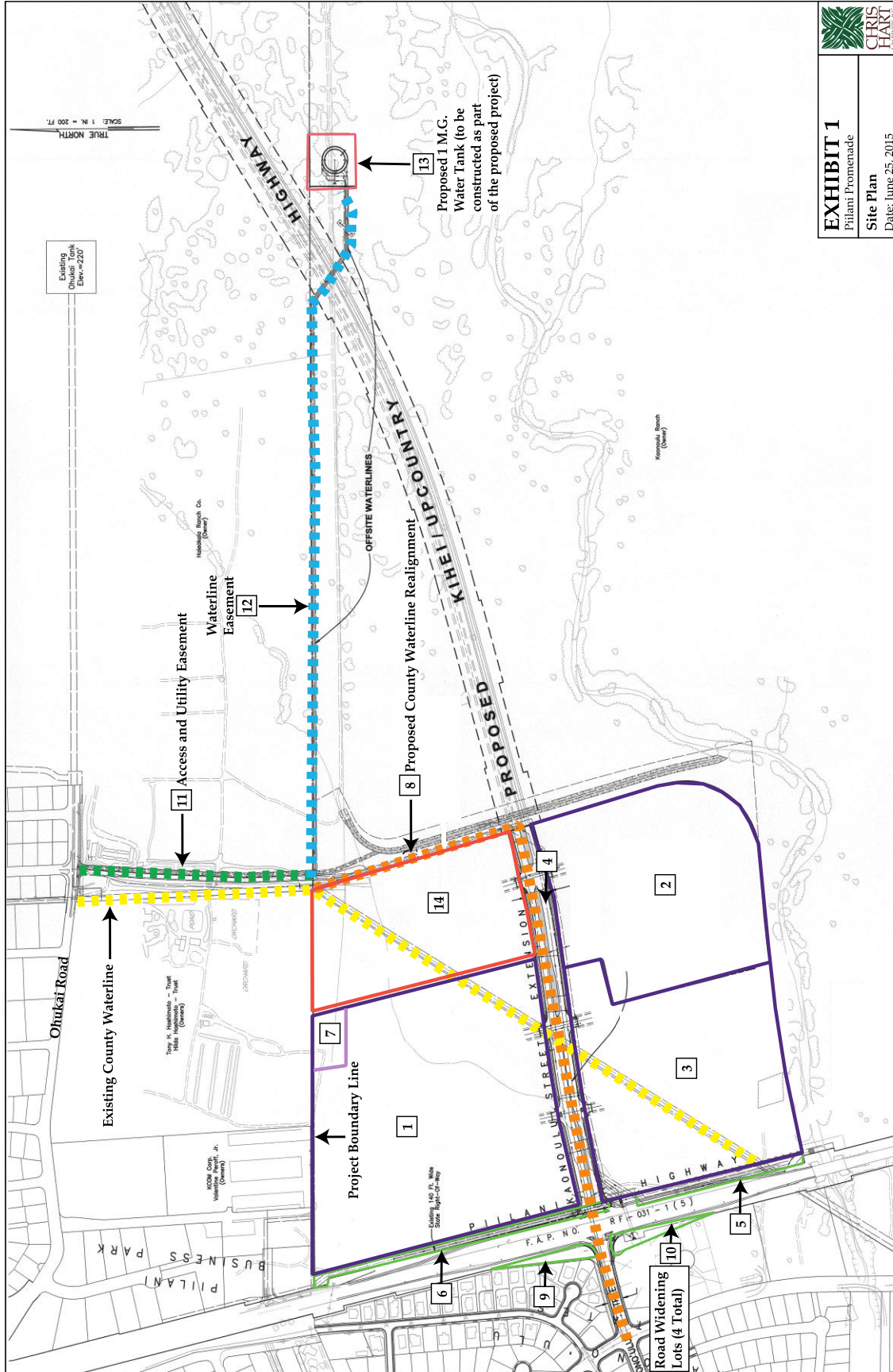


EXHIBIT 1
 Pilihi Promenade
 Site Plan
 Date: June 25, 2015



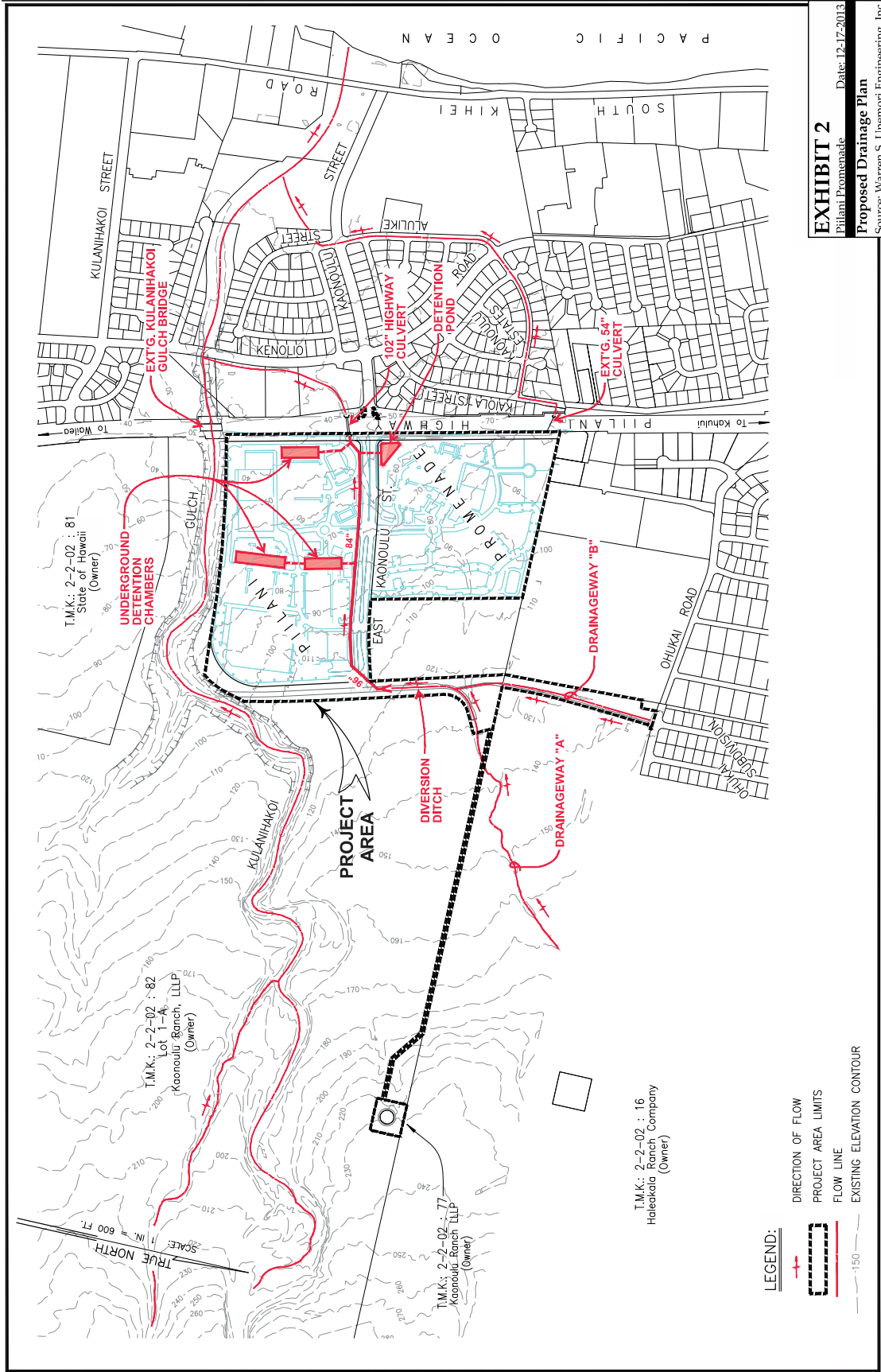
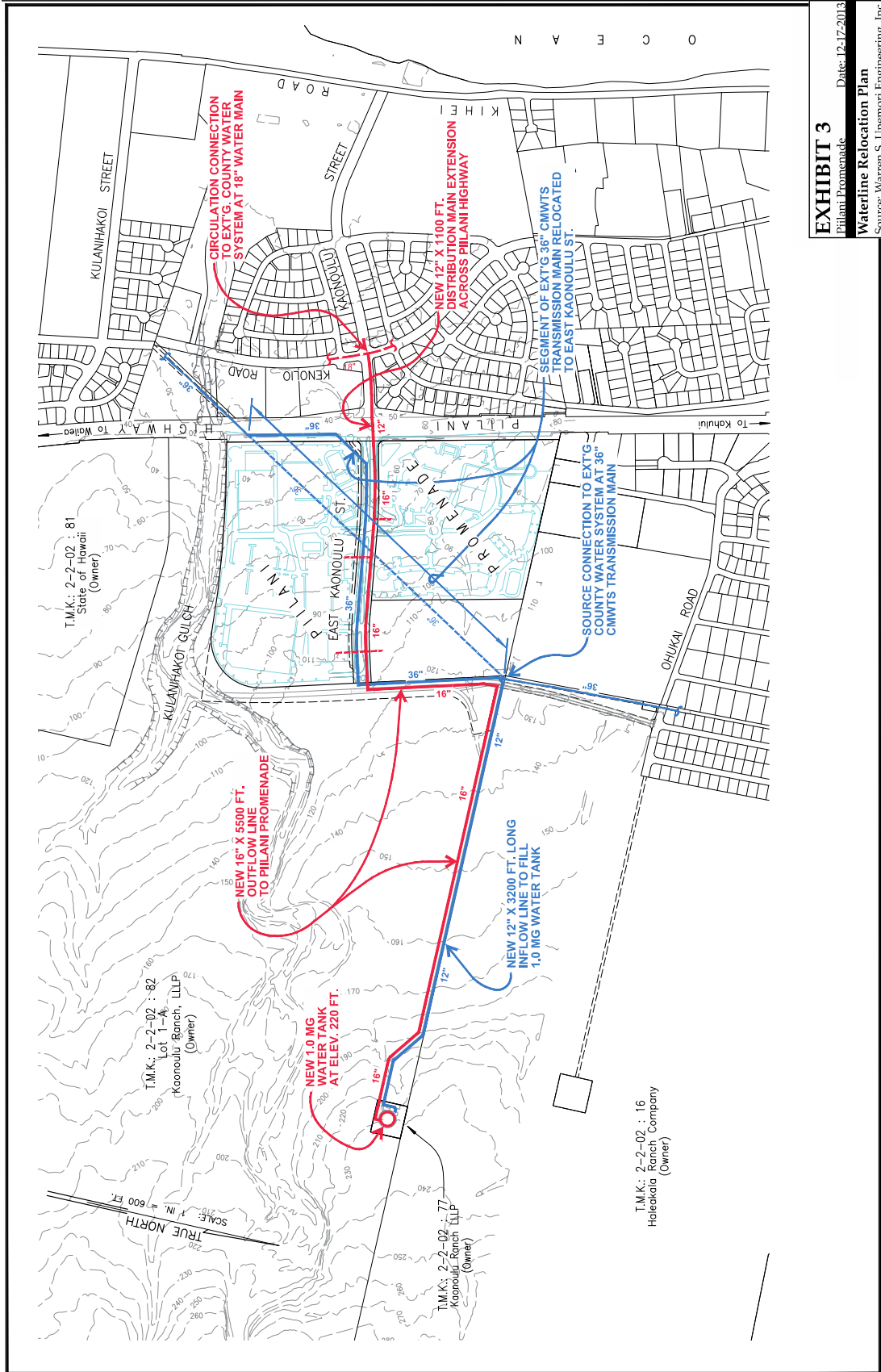


EXHIBIT 2
 Piilani Promenade
 Proposed Drainage Plan
 Date: 12-17-2013
 Source: Warren S. Umemori Engineering, Inc.



**APPENDIX E: Maui Cultural Lands memo to the
SHPD**

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

Pi'ilani Promenade Summary

Provided by Maui Cultural Lands

- 88-acre PP site in Ka'onoulu has more recorded archaeological sites (20) than any other south Maui property in the same elevation (30 to 150 ft AMSL). 80% of the sites were thought to be pre-contact
 - Half of the recorded sites have associated pre-contact surface midden or portable remains, also very uncommon in this South Maui elevation. Two of the 8 sites tested had pre-contact subsurface deposits. We support more subsurface testing.
 - several of the 20 sites will be completely impacted by the proposed Upcountry Highway's current alignment: **sites 3727 & 3742**, while others will be nearby, but not in the 300 ft corridor: 3728, 3729, 3741, 3743, 3745.
 - More unrecorded midden and portable remains are found throughout the PP parcel as well as what practitioners believe to be unrecorded sites.
 - Most culturally significant recorded feature (site 3746 petroglyph stone) was illegally removed from the site in 1998 (an after the fact permit was later completed.) No other open field site at this elevation in South Maui has any reported petroglyphs. Practitioners believe the petroglyph indicated a water source was near by and likely indicated a trail in the area.
 - Currently, not one site on the parcel is recommended for any preservation, although project design could accommodate sites in greenways and landscape spaces.
- MCL and others asked for a site visit in Feb 2014 to offer cultural consultation, but no visit has yet been arranged.
- The revised AIS and data recovery plan should not be approved until further fieldwork is completed and consultation with cultural practitioners is included in that field work.

Mahalo for your Consideration of a Cultural Perspective

PI'ILANI PROMENADE AIS COMMENTS



Based on investigations by



BACKGROUND MAP: based on 1994 AIS of lands mauka of Pi'ilani Hwy just N. of Kulanihako'i Gulch, Ka'ono'ulu, Kula, south Maui (proposed Piilani Promenade shopping mall)

TWENTY SITES DOCUMENTED: 80% pre-contact

Five artifact and midden scatters (pink dots) show possible habitation areas mauka of Pi'ilani Hwy.

Proposed Kihei-Upcountry Road bisects the property

blue line = Ka'ono'ulu gulch

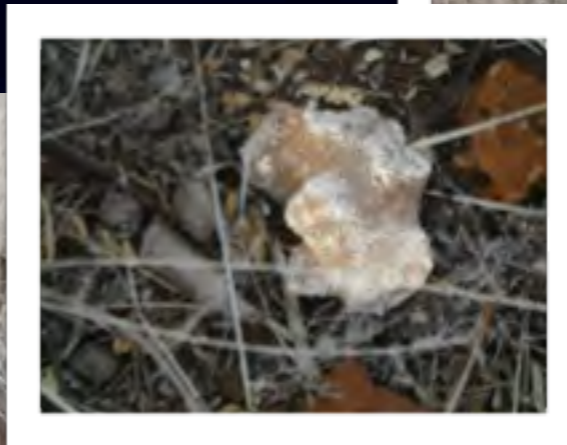


**AIS COMMENT 1. “UNLOCATED SITES” FROM 1994 AIS MAY NOT BE DESTROYED.
 SITE VISIT AND MORE FIELDWORK NEEDED**



SITE 3732 FOUND!

Site 3732 and every other site around it was “not relocated” in the 2014 AIS update.



Site 3732 (from 1994 AIS)

“stone cairn located on a promontory near the eastern border of the study area at el. of 115 ft AMSL. A large coral chunk was located 24 m. south of the cairn.”

The elevation and location of this cairn site, pictured here in Sept. 2014, matched the AIS description. A faded site flag was found under one of the rocks of the cairn, and several branch coral chunks (not likely the original one) found near the base of promontory.

More undocumented coral fragments seen near rocky base of promontory
where site 3732 is located



Location of 20 original sites from 1994 AIS shown on a topo map.
2014 AIS had NINE “unlocated sites,” (here circled in red.)
Were all really destroyed? Site 3732 location is noted.



Are there other “UNLOCATED sites” that were obscured by heavy foliage DURING 2014 SURVEY?



Rock Alignment: possible “unlocated site”
Is this rock alignment
part of site 3737, 3738 or 3739?

site 3737, 3738 and 3739 are described
in 1994 AIS as “Parallel Alignments”
from former military use along the
southern project boundary
on the edge of Kulanihako’i Gulch.

Cultural practitioners believe
site 3737 was the remains of
a heiau connected with the god Ku,
overlooking the gulch

Sites 3737-39 are listed in 2014 AIS
as unlocated and destroyed. Are they?

AIS Comment 1 (continued): **New Sites Could be Found.** Does project location have additional Unrecorded Sites?

Portion of unrecorded site on base of promontory where site 3732 is located. Site was covered with large kiawe branches and high grass

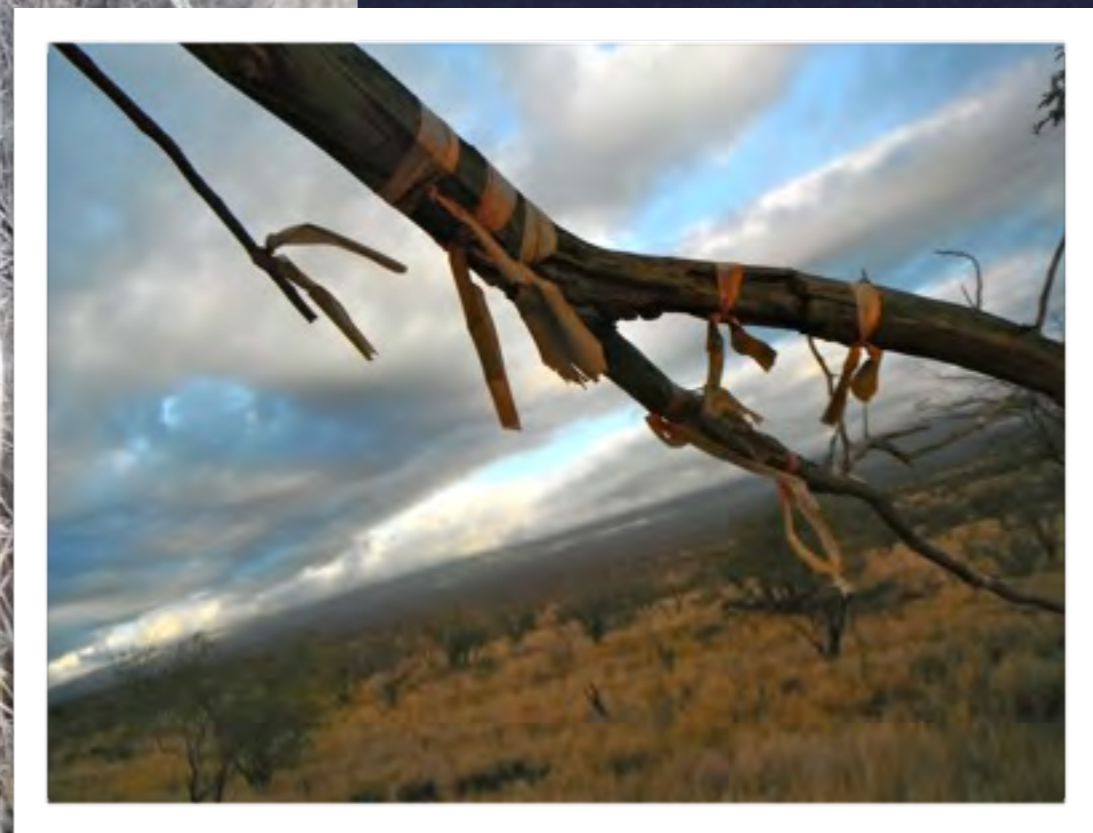


arrow indicates
Undocumented Site location:
on map of 1994 sites

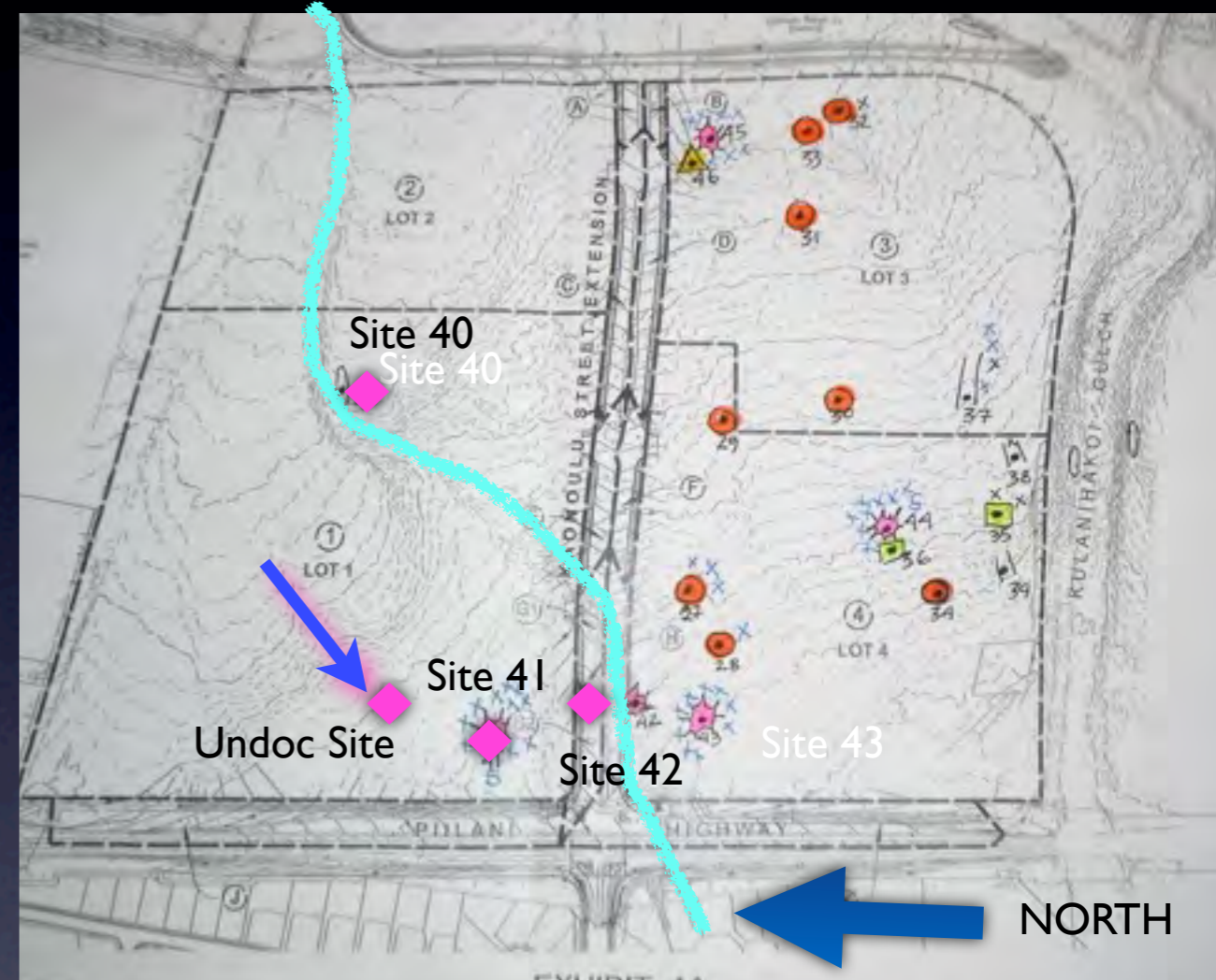


east-west view of southern wall of same site, which appears to be part of an U-shaped structure

below: a kiawe tree above this site has marking tape remnants. There is no mention of this site being evaluated in 1994 or 2014 AIS



Undocumented stone alignment north of site 3741 (“Site 41”)



Undocumented Site location indicated by arrow.
Note: only three sites (shown by pink diamonds) were recorded in 1994 Survey, as located north of proposed Upcountry Hwy corridor that divides the lot.
Are other sites likely to exist there?



examples of unrecorded shell midden and small portable remains of coral and rounded stones documented by volunteers, north of site 3741, where no sites are recorded...

AIS Comment 2: ADDITIONAL UNRECORDED SITES ARE FOUND ON ADJACENT LAND.

Sites in the section that follows are in an area where the adjoining Shefcheck et al AIS (2008) for Ka'ono'ulu Ranch shows NO SITES



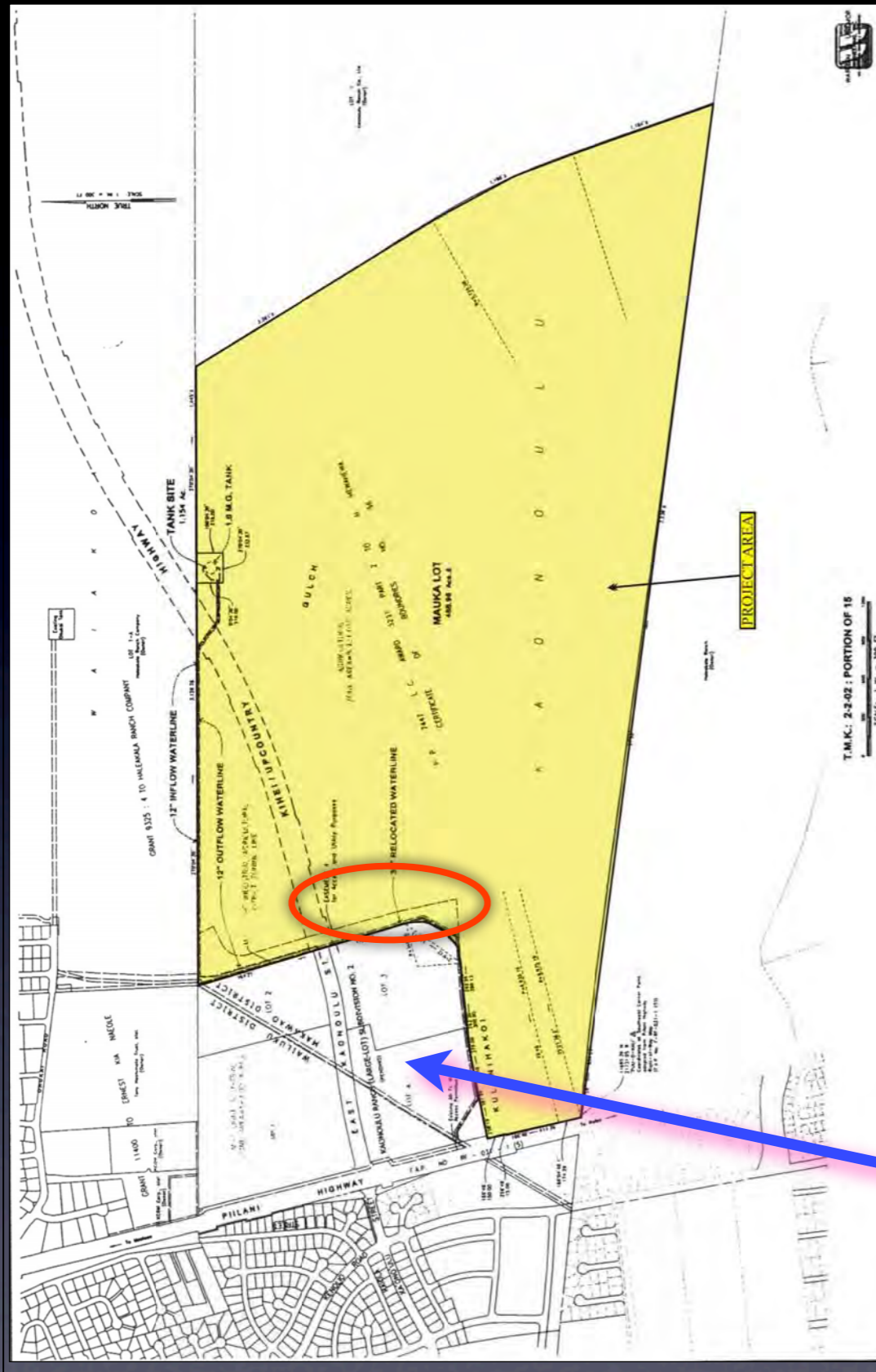


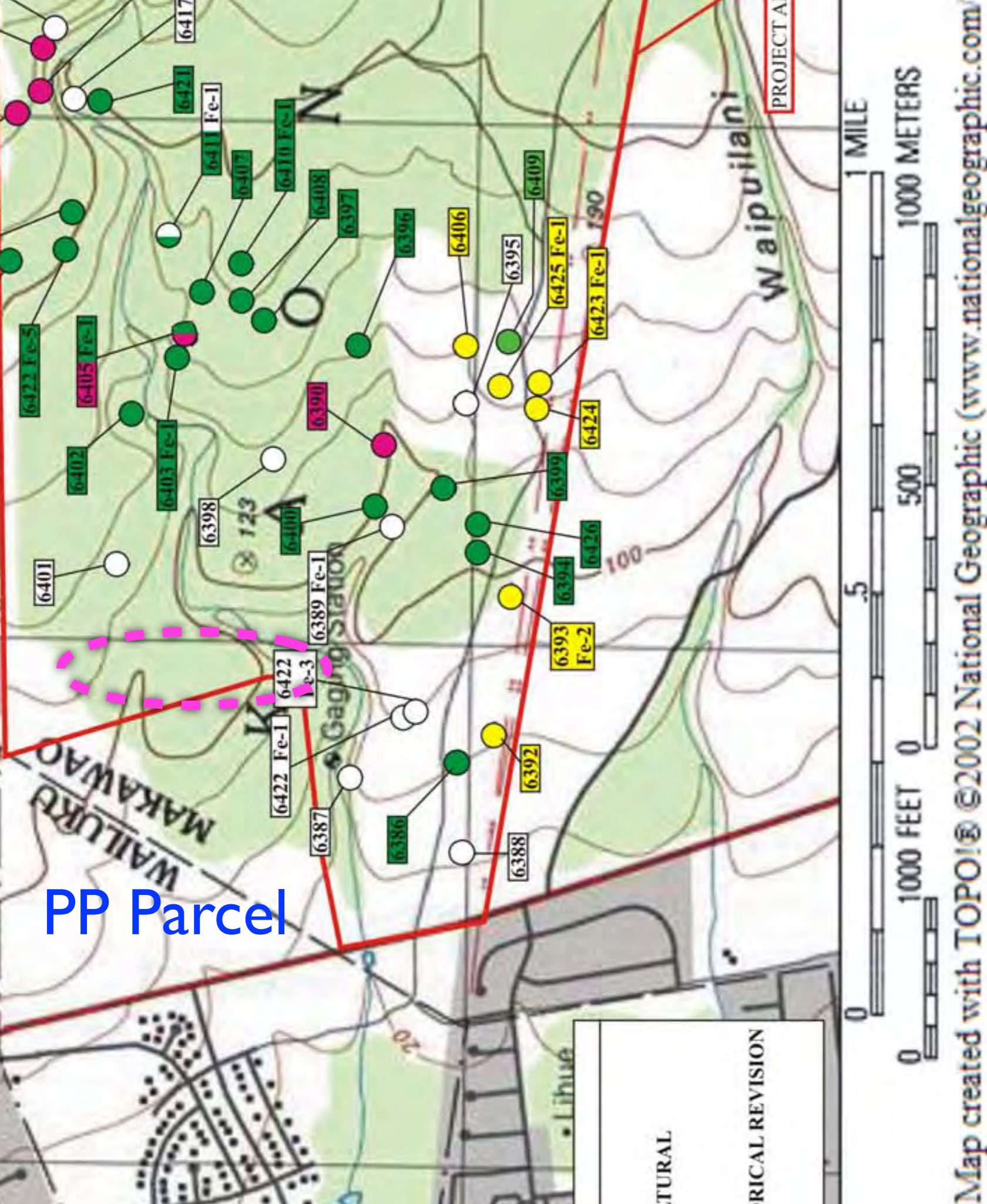
Figure 3: Tax Map Key [TMK] Showing the Project Area in Detail.

Site location map from Shefcheck et al AIS (2008) Yellow shows Ka'ono'ulu Ranch's 515-acre "project area."

This 2008 study claimed to cover all the lands along the south and east boundary fence of the Pi'ilani Promenade ("PP") 88-acres. Red ellipse shows area of unrecorded sites in pix to follow

A portion of PP drainage and utility structures are located on the Ka'ono'ulu parcel and were included in 2014 PP AIS, but no survey of the gulch slope was done.

PP 88-acre parcel



Map of the Project Area Showing GPS Points for the Sites Identified in the 2008 AIS

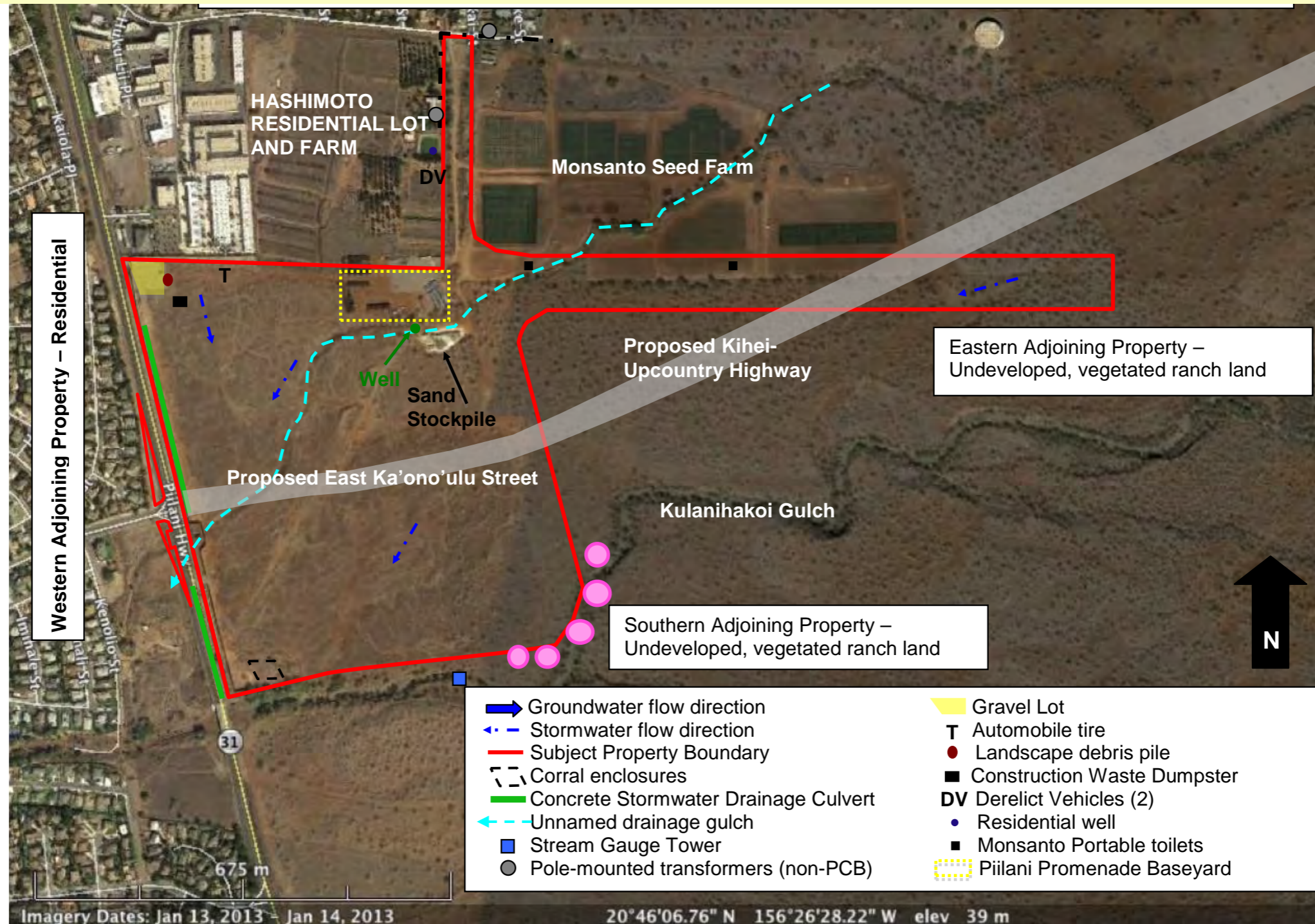
Site map from Shefcheck et al 2008 AIS shows NO sites recorded on lands owned by Ka'ono'ulu Ranch that lie between the PP eastern boundary fence and Kulanihako'i gulch (pink ellipse)

All site numbers in this portion of map are labels referring to sites located to the south, in Kulanihako'i gulch.

In short, NO ONE has documented the sites adjacent to the PP parcel which very likely are associated with the sites found on the PP parcel and are part of the history of Ka'ono'ulu.

PP Parcel

Undocumented Ka'ono'ulu sites are located in area of "pink dots" above Kulanihako'i Gulch. PP project area and associated offsite utilities are outlined in red. Diagram Source: PP DEIS



Undocumented areas near Kulanihako'i gulch on Ka'ono'ulu Ranch land appear modified to permit possible habitation or planting structures. Pili grass, used for thatch grew plentifully in the area



Undocumented site: well built terrace on slope above Kulanihako'i gulch



Undocumented site: other modified areas on slope above (west of) Kulanihako'i gulch





Closeup of previous
undocumented site

Undocumented sites: small mounds and other structures on slope above
Kulanihako'i gulch just to south and East of PP fence line



closeup of same structure on slope above Kulanihako'i gulch

PP Parcel



Sites outside the 88-acres and along Kulanihako‘i Gulch:
rocks formed into terraces and low walls



Undocumented site: possible petroglyph area/shelter in Kulanihako'i gulch
immediately east of PP project site





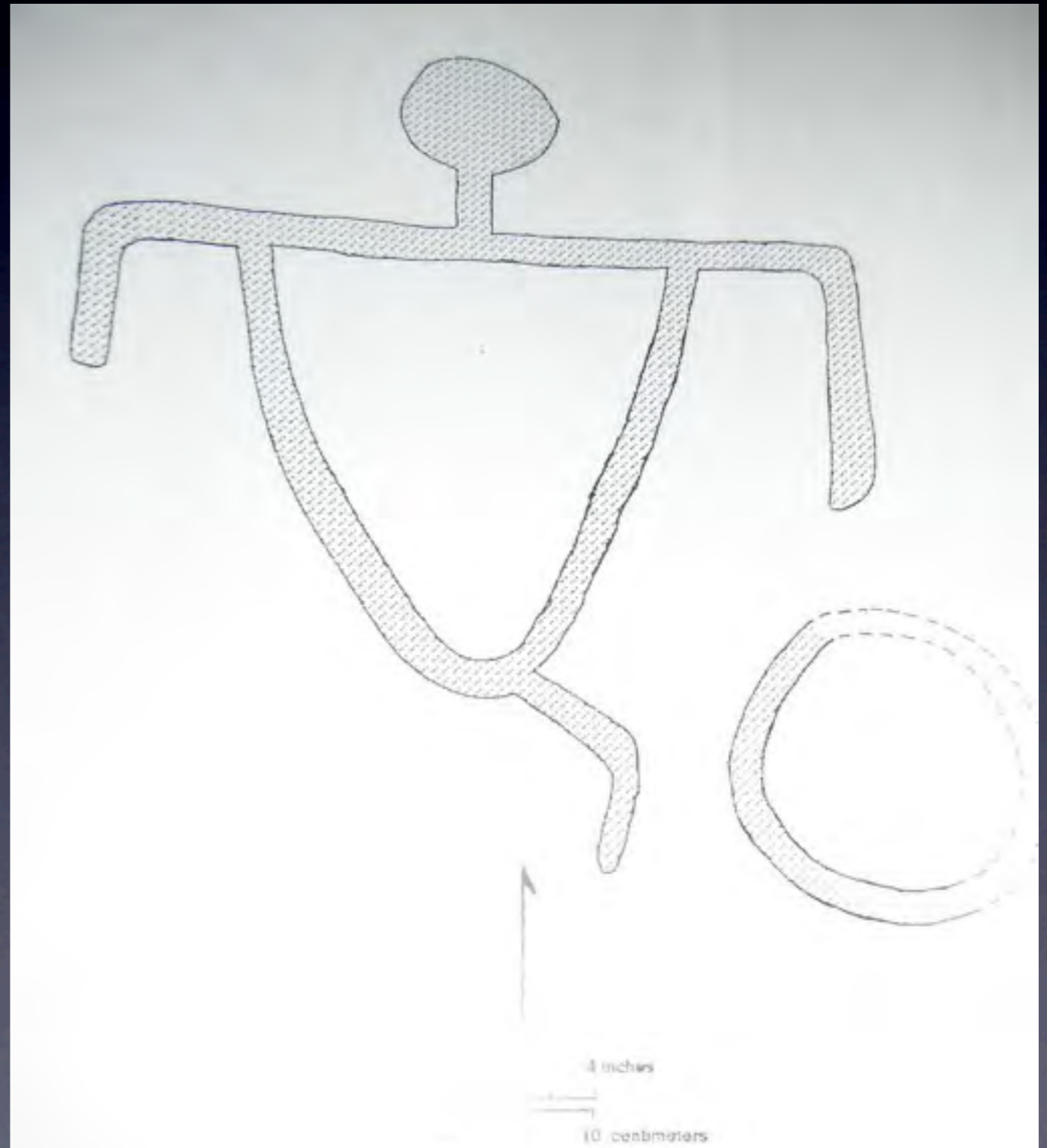


Gulch site petroglyphs may relate to site 3746 recorded on the PP site. There, a large rock near a midden scatter had a petroglyph carved into it (representational drawing below from project's 1994 AIS)

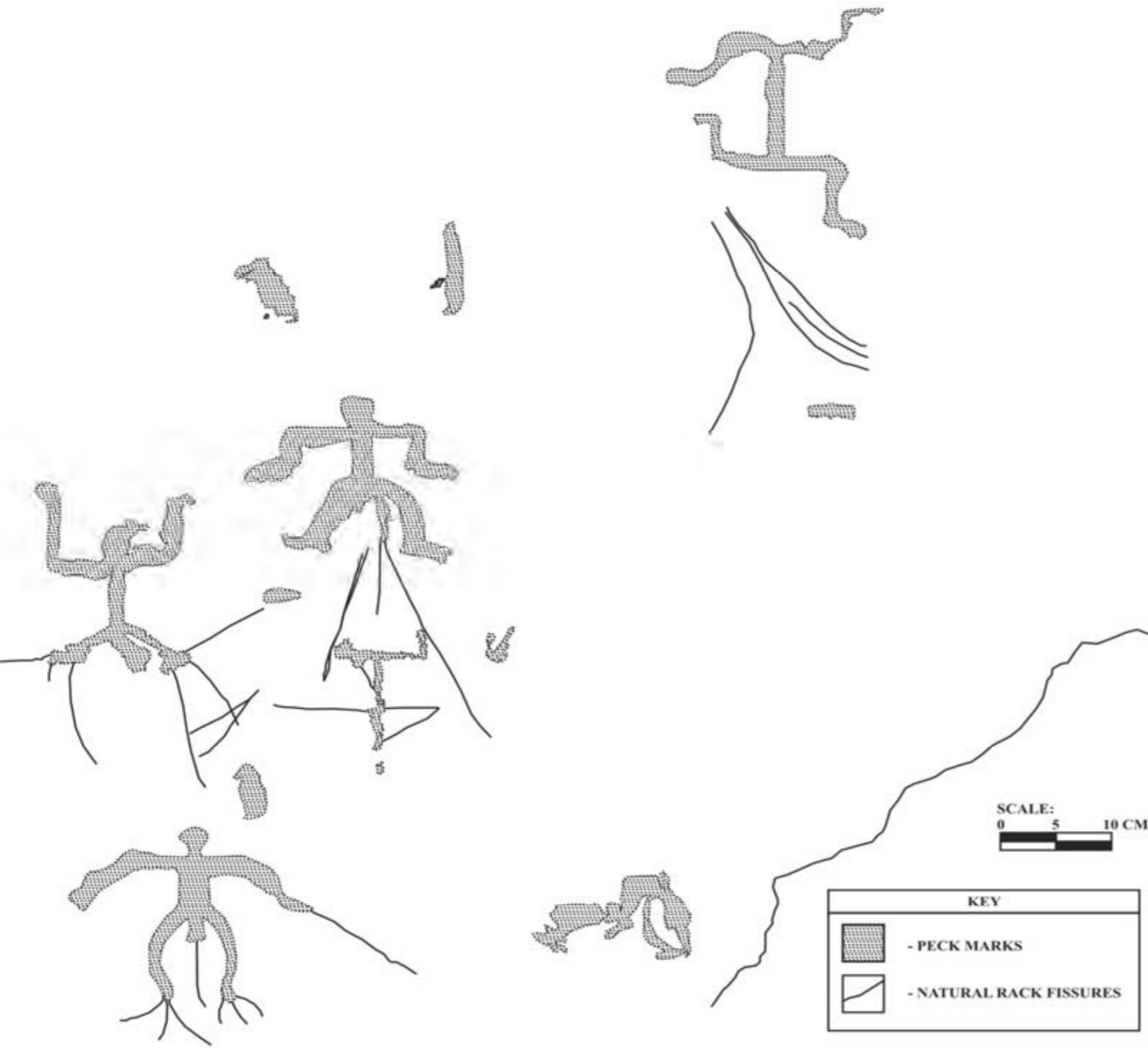
This site was near the eastern boundary of what is now PP's 88-acres on the way to Kulanihako'i Gulch

practitioners believe it indicated a fresh water source nearby

It is now removed from the site

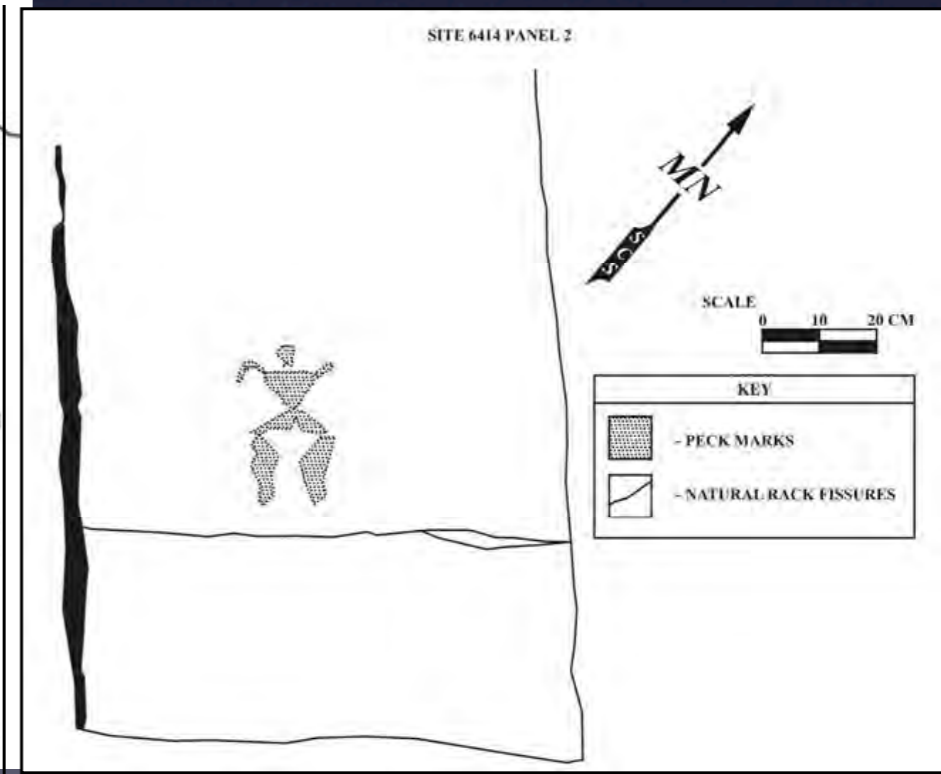


SITE 6413 PETROGLYPH PANEL 3



More petroglyphs were documented by Shefchecks 2008 study of Ka'ono'ulu lands immediately mauka of the PP site (Site 6413). These petroglyphs were also located in Kulanihako'i Gulch above a rock shelter....

SITE 6414 PANEL 2



COMMENT 3: CULTURAL PRACTITIONERS WANT TO CONTRIBUTE TO SITE SIGNIFICANCE EVALUATION.



Kumu Mike Lee believes site 3732 and others oriented East-West were associated with seasonal observations and celebrations of sun, moon and stars to aid in planting and fishing cycles.

He invited fellow practitioners to the site for the autumn Equinox sunrise



Cultural access September 2014: Site 3732



Eastern view, site 3732 mound, sunrise, Autumn Equinox

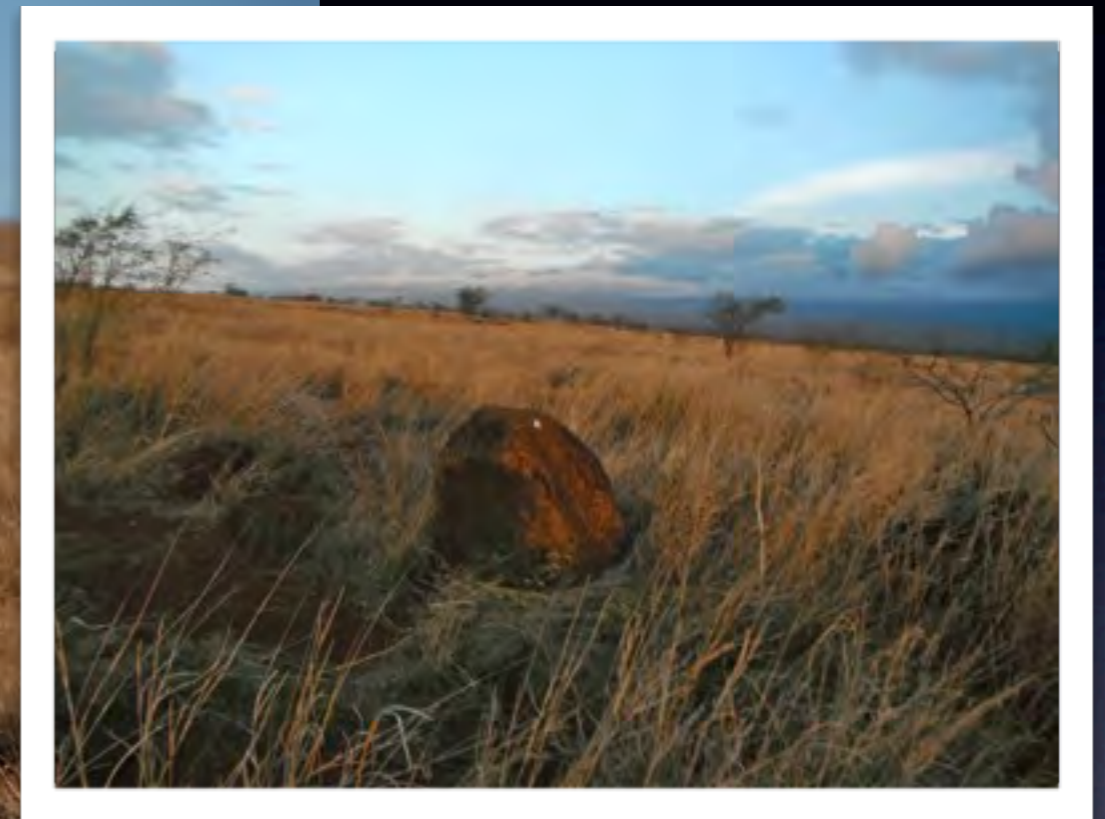


As noted in the 1994 AIS, site 3732 is located on the highest point in the southern portion of the PP parcel, near Kulanihako'i Gulch.

The presence of coral nearby also speaks to the need for more consultation on significance evaluation of this site



Kumu Lee also led practitioners to a natural feature he believes is associated with viewing of eclipses. It serves as a location marker for eclipse viewing by use of the waiaka or traditional “water mirror”



Practitioners viewing an October 2014 lunar eclipse at the site in a waiaka.
Natural stone marker is in foreground.



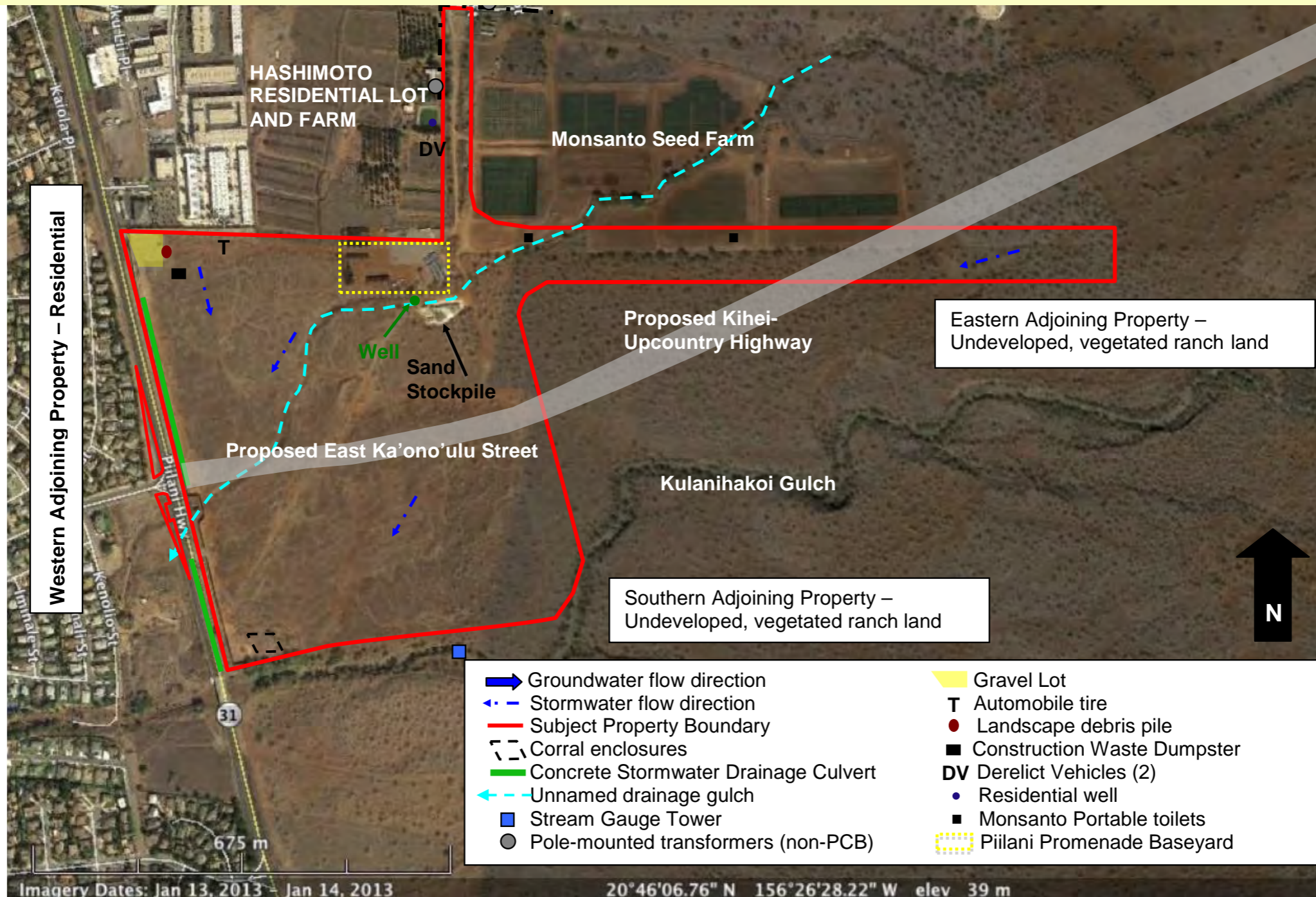
COMMENT 4: MORE INFORMATION IS AVAILABLE ABOUT SITES FIRST DOCUMENTED IN 1994
but this information is not included in the draft AIS



Site 3727 (three mounds) may have been re-documented in 1997 with additional features during the Kihei-Upcountry Highway AIS



The future proposed Highway corridor bisects the PP project site and is the southern terminus of the highway. The Highway AIS surveyed the PP site along the Hwy corridor in 1997 and 2000, after Fredricksen completed his AIS in 1994. The Highway corridor AIS recorded additional features and portable remains at “site 4776” in Ka’ono’ulu on the PP parcel. This should be discussed in the 2014 AIS.



Site 4776 description in the Upcountry Highway AIS, notes “lithic tools” with hammerstone and basalt flakes. Site 4776 was first recorded in 1997 Highway Reconnaissance Survey at a similar elevation (65 ft.AMSL) in Ka’ono’ulu as Fredricksen’s Site 3727 (60 to 62 ft AMSL.)

Site 4776 was described in the Highway corridor AIS (CSH: 2000) as “midden and lithic scatter” that included a “low mound of cobbles” with a previously dug archaeological test pit (possibly the test unit Fredricksen did in 1997 at site 3727?)

State Site #:	50-50-10-4776	CSH #20
Site Type:	Midden and lithic scatter/ mound	
Function:	Habitation, recurrent/agriculture	
Corridor:	Alternate K1	
Features (#):	1	

Description: State site #50-50-10-4776 is a surface scatter of marine shell midden, coral, and lithic tools and detritus including a hammer-stone. A low mound of cobbles and small boulders is also included within the bounds of the site. The site is located between centerline stakes 3000 and 3001 along the east side of Kūlanihākoʻi Gulch at Piʻilani Highway. The area in which the mound, scattered cultural middens, and artifacts were observed measures approximately 37 m. (about 120 ft.) in diameter. A previously dug pit within the mound at the site appears to be one meter square, as would be expected for archaeological test excavation units. This probability is augmented by the presence, nearby the mound, of two back-dirt piles from the mound excavation - one of sifted dirt and the other of neatly stacked rocks. Nevertheless, a search of previous archaeological studies conducted in the area and consultation with the Department of Land and Natural Resources, Historic Preservation Division staff did not determine the origin of the excavations. Intact archaeological deposits at the site appear unlikely. Deflation of a former soil deposit may have created the site as we see it today, or the site may have originally been only a surface scatter. Flora at the site is consistent with most of the low land survey area - open savannah, the predominant tree is *kiawe*.

SIHP Site 3727: three mound features, with basalt core and flakes found in 1994 at an el. 60-62 ft AMSL
Site 3727 and Site 4776 are shown in the Upcountry Hwy corridor in the Highway project's AIS Map.



**Arch Site Map
Kihei-Upcountry
Highway AIS
(CSH: 2000)**

**Site 3727 and 4776
appear to be side
by side..or perhaps
are really one site**

Map shows relative
locations given
for
Fredricksen's site
3727 and CSH's site
4776.
Both are shown on
the Pi'ilani
Promenade site
along the Upcountry
Highway corridor. Is
there one site or two?
if there are TWO sites,
4776 should be listed
in the new PP AIS
update.

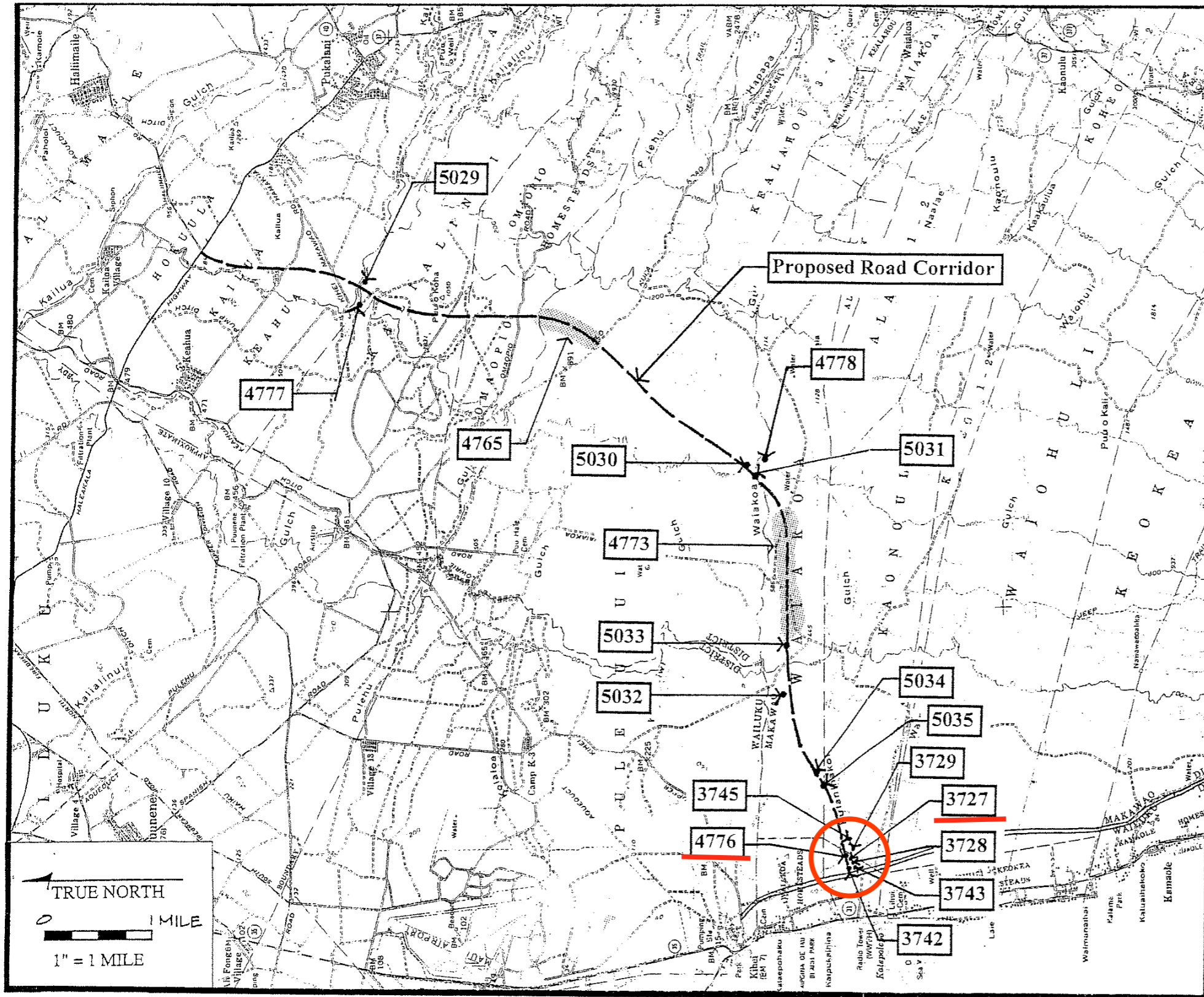


Figure 9 Project area map based on USGS 7.5 minute series topographical maps of the Pu'u O Kali and Paia quadrangles, showing the corridor and location of historic properties.

The Kihei-Upcountry Highway 2000 AIS lists all of the Ka'ono'ulu sites in the Highway road corridor that are found in the PP property, including Site 3727 (see below), and lists Site 4776 separately.

Conversely, the updated PP AIS has no mention of the Kihei-Upcountry Highway AIS and its work in the area. This should be corrected.

We are grateful that Site 3727 is recommended for Data Recovery in the Draft 2014 PP AIS. If it is also the location of Site 4776, this is a good time to clarify things.

VII. SITE DESCRIPTIONS

State Site #: 50-50-10-3727
Site Type: Series of Mounds
Site Function: Agriculture
Features: 3

Description: State site 50-50-10-3727 is comprised of three irregular shaped mounds (designated features A-C) (Figure 10) with a previously excavated 1.0 m by 0.5 m test unit. The site was initially documented by Xamanek Researches (Fredericksen, et. al. 1994c:61). The site is located approximately 50 ft to the south of the study corridor centerline. The mounds are roughly in a straight line which is oriented at roughly 225°T.

Feature A the northernmost mound was partially excavated during the 1994 Xamanek study. A 1 m by 50 cm test unit was excavated into the northern portion of the mound. Feature A presently measures 1.5 m in diameter. It is constructed of a rough stacking of basalt cobbles to medium boulders with a maximum height of 35 cm in the center of the structure. There is a small mound located approximately 1.2 m to the east of the northern mound is a small mound, approximately 70 cm in diameter, which appears to be the byproduct of the excavation.

Feature B, located in the center of Feature A and Feature C, is constructed in a similar style to Feature A. Feature B is located approximately 2.5 m from the Feature A. The mound measures 1.9 m NE/SW by 1.1 m NW/SE. The maximum height of the mound, near its center, is 50 cm.

Feature C, the southern most mound, is located approximately 1.0 m from the southern end of Feature B. It is irregular in shape and is also constructed of stacked basalt cobbles to medium boulders. Heights of the mound range from 20-50 cm. A few fragments of cowrie shell were observed just to the south of Feature C. The site was relocated.

In Summary

- 88-acre PP site in Ka'onoulu has more recorded archaeological sites (20) than any other south Maui property in the same elevation (30 to 150 ft AMSL). 80% of the sites were thought to be pre-contact
 - Half of the recorded sites have associated pre-contact surface midden or portable remains, also very uncommon in this South Maui elevation. Two of the 8 sites tested had subsurface deposits. We support more subsurface testing.
- several of the 20 sites will be completely impacted by the proposed Upcountry Highway's currently proposed alignment and are discussed in the Highway project's 2000 AIS but this information, and additional features found, is not included in Fredricksen's 2014 Draft AIS. Impacted sites are 3727 & 3742, while others will be nearby, but not in the 300 ft corridor: 3728, 3729, 3741, 3743, 3745.
 - More unrecorded midden and portable remains are found throughout the PP parcel as well as what practitioners believe to be unrecorded sites, including sites listed as "unlocated" in the 2014 Draft AIS.
 - Most culturally significant recorded feature on this site (SIHP Site 3746 petroglyph stone) was illegally removed from the site in 1998 (an after the fact permit was later completed.) No other open field site at this elevation in South Maui has any reported petroglyphs. Practitioners believe the petroglyph indicated a water source was near by and likely indicated a trail in the area.
 - Currently, not one site on the parcel is recommended for any preservation, although project design could accommodate sites in greenways and landscape spaces.
- MCL and others asked for a site visit in Feb 2014 to offer cultural consultation on site significance, but no visit has yet been arranged.
 - The revised AIS and data recovery plan should not be approved until further fieldwork is completed and consultation with cultural practitioners is included in that field work.

The land of Ka'ono'ulu has a long history
Does it remain to be told or simply vanish?
Mahalo for your consideration

