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May 31, 2018

Rick Wheelock  
181 Kalaniana'ole Street  
Hilo, Hawai'i 96720  
Email: richardeastwestrealty.org

IN REPLY REFER TO:  
Log No. 2018.01123  
Doc. No. 1805SN05  
Archaeology

Dear Mr. Wheelock:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Archeological Inventory Survey of 5.0 Acres in Hōlualoa  
Hōlualoa 1st Ahupua'a, North Kona District, Island of Hawai'i  
TMK: (3) 7-6-021:017 por.**

This letter provides the State Historic Preservation Division's (SHPD's) review of the revised report titled *Archeological Inventory Survey Report for 5.0 Acres Located in Hōlualoa 1st Ahupua'a, North Kona, Hawai'i Island, Hawai'i [TMK: (3) 7-6-021:017 por.]* (Escott and Escott, revised May 2018). Revisions to the report were requested via email on May 13, 2018 (Susan Lebo [SHPD] to Glenn Escott [Scientific Consultant Services, Inc. (SCS)]) and SHPD received the revised report on May 18, 2017.

SCS conducted the archaeological inventory survey (AIS) at the request of the landowner, Kona Three, LLC. The AIS was conducted in support of a County of Hawaii permit application for proposed development of the property. The AIS covered a 5.0-acre portion of the 30.901-acre parcel. The fieldwork included a 100% pedestrian survey of the entire project area. Ground visibility was fair to poor. Subsurface testing was conducted at several features.

The AIS documented twenty-two newly identified historic properties (Table 1). The sites include a pre- and/or early post-Contact lava tube burial, pre- and/or early post-Contact agricultural terraces, and post-Contact walls and enclosures associated with agriculture and/or ranching, and a post-Contact railroad berm.

Table 1. Summary of Sites Documented in AIS

Site #50-10-37-	Type	Function	Age
30591	Agricultural Complex	Agriculture	Pre- to Post-Contact
30592	Railroad and Berm	Transportation	Historic
30593	Lava Tube	Burial	Pre- to Early Post-Contact
30594	Agricultural Complex	Agriculture	Pre- to Post-Contact
30595	Rock Wall	Ranching	Historic
30596	Possible Hearth	Food Preparation	Historic
30597	Rock Wall	Ranching	Historic
30598	Rock Wall	Agriculture/Ranching	Pre- to Post-Contact
30599	Platform & Enclosure	Ranching/Agriculture	Historic
30600	Terrace	Agriculture	Historic
30601	Rock Wall	Ranching	Historic
30602	Enclosure	Ranching/Agriculture	Historic
30603	Enclosure	Ranching/Agriculture	Historic

Site #50-10-37-	Type	Function	Age
30604	Agricultural Complex	Agriculture	Pre- to Post-Contact a
30605	Rock Wall	Ranching/Agriculture	Pre- to Post-Contact
30606	Rock Wall	Ranching/Agriculture	Pre- to Post-Contact
30607	Agricultural Complex	Agriculture	Pre- to Post-Contact
30608	Enclosure	Dwelling and Storage	Historic
30609	Enclosure	Dwelling and Storage	Historic
30610	Terrace	Agriculture	Pre- to Post-Contact
30611	Agricultural Complex	Agriculture	Pre- to Post-Contact
30612	Lava Blister	Refuse Dump	Historic

The 22 sites were assessed as significant under HAR §13-284-6 Criterion d. Site 30592 (railroad berm) was also assessed as significant under Criteria a and c and was recommended for preservation. Site 30593 (lava tube burial) was assessed as significant under Criterion e and was recommended for preservation. Preservation measures will be outlined in Burial Treatment Plan. The AIS report recommends no further archaeological work for the Site 30591 and for Sites 30594 through 30612. Sufficient information has been collected for these sites to adequately provide information on their age and function.

Based on the above information, SHPD's determination is "effect, with agreed-upon mitigation". SHPD concurs with the significance and treatment recommendations.

The report meets the requirements specified in HAR §13-276-5. **The report is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version to the Kapolei SHPD office, attention SHPD Library ([Helen.W.Smith@hawaii.gov](mailto:Helen.W.Smith@hawaii.gov)).

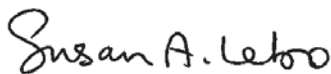
As stipulated in HAR §13-284-7, when SHPD comments that a project will result in "effect with agreed-upon mitigation commitments", then detailed mitigation plans shall be developed for SHPD review and acceptance prior to project initiation. The agreed upon mitigation commitments are preservation and archaeological monitoring.

Pursuant to HAR §13-284-8, **SHPD looks forward to receiving** a burial treatment plan for Site 30593, an archaeological preservation plan meeting the requirements of HAR 13-279-4 for Site 30592, and an archaeological monitoring plan meeting the requirements of HAR §13-279-4, prior to any County permit issuance.

**SHPD shall notify the County** when our office has reviewed and accepted the archaeological preservation plan and the archaeological monitoring plan, and the interim preservation and the burial treatment measures have been implemented, and the permit application has been reviewed, and permit issuance may occur.

Please contact Sean Nāleimaile at (808) 933-7651 or at [Sean.P.Naleimaile@hawaii.gov](mailto:Sean.P.Naleimaile@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,



Susan A. Lebo, PhD  
Archaeology Branch Chief

cc. Glenn Escott, SCS, [ggescott@yahoo.com](mailto:ggescott@yahoo.com)