

Hakoda, Riley K

From: Orodenker, Daniel E
Sent: Tuesday, October 23, 2018 3:31 PM
To: Hakoda, Riley K
Subject: Fwd: Revised Draft Archaeological Literature Review and Field Inspection Report for the Keālia Mauka Homesites Project - TMKs: (4) 4-7-004:001 CSH Job Code: KEALIA 2
Attachments: 4-4-7-004_2018-00602_1805GC09_ARCHY_6E8_PRMT_AIS_REQ.pdf; ATT00001.htm

Daniel Orodenker

Begin forwarded message:

From: "Buckley, David R" <David.Buckley@hawaii.gov>
Date: September 17, 2018 at 10:17:13 AM HST
To: "mkamai@culturalsurveys.com" <mkamai@culturalsurveys.com>, Hallett Hammatt <HHammatt@culturalsurveys.com>
Cc: "Orodenker, Daniel E" <daniel.e.oroedenker@hawaii.gov>, "Chance Bukoski (cbukoski@kauai.gov)" <cbukoski@kauai.gov>, "khull@kauai.gov" <khull@kauai.gov>
Subject: Revised Draft Archaeological Literature Review and Field Inspection Report for the Keālia Mauka Homesites Project - TMKs: (4) 4-7-004:001 CSH Job Code: KEALIA 2

Aloha Hallett and Missy,

The State Historic Preservation Division (SHPD) received a revised draft Archaeological Literature Review and Field Inspection Report (LRFI) on April 19, 2018 (Log No. 2018.00938) from Cultural Surveys Hawai'i, Inc. (CSH), at the request of Mr. Scott Ezer of HHF Planners, providing SHPD with an informational copy of the *Revised Draft Archaeological Literature Review and Field Inspection Report for the Keālia Mauka Homesites Project, Keālia Ahupua'a, Kawaihau District, Kaua'i [TMKs: (4) 4-7-004:001]* (CSH Job Code: KEALIA 2) (Kamai and Hammatt, April 2018).

Per a letter from SHPD dated May 29, 2018 (Log No. 2018.00602; Doc No. 1805GC09SHPD), the two SHPD comments were as follows:

(1) SHPD has no objection to the Petition for Land Use District Boundary Amendment to reclassify approximately 53.361-acres of land from

agricultural district to urban district.

(2) SHPD requests an AIS with a subsurface testing component be completed for the current 53.61-acre project area prior to permit issuance.

SHPD's request for a new AIS is based on the results of the Kama'i and Hammatt (2017) field inspection, which indicates that the prior AIS studies did not adequately document all surface historic properties. Subsurface testing was not conducted within the footprint of the proposed residential development. Additionally, it remains unclear whether all historic roads have been adequately identified and inventoried.

The SHPD letter dated May 29, 2018 is also attached to this email.

If you have any questions or comments regarding the project, feel free to contact me.

Thank you,

David Buckley

David Buckley
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DAVID Y. IGE
GOVERNOR OF HAWAII



LAND USE COMMISSION
STATE OF HAWAII

2018 OCT 23 P 5:17



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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2018

Daniel E. Orodenker, Executive Officer
Land Use Commission, State of Hawaii
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Honolulu, HI 96813
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IN REPLY REFER TO:
Log No. 2018.00602
Doc No. 1805GC09
Archaeology

SUBJECT: **Chapter 6E-8 Historic Preservation Review-
Docket No. A17-803/Kealia Properties, LLC
Keālia Mauka Homesites Project
Keālia Ahupua‘a, Kawaihau District, Island of Kaua‘i
TMK: (4) 4-7-004:001**

This letter provides the State Historic Preservation Division's (SHPD's) comments regarding (1) a *Petition for Land Use District Boundary amendment to reclassify approximately 53.361 acres of land* from agricultural district to urban district to support development of the Keālia Mauka Homesites, and (2) *confirmation that the proposed 53.361-acre Petition Area has been reasonably addressed in the prior AIS (Drennan et al. 2006), and that the requirements of Hawai‘i Revised Statutes Section 6E have been met.*

The submittal included an *Archaeological Literature Review and Field Inspection Report (LRFI)* (Kamai and Hammatt, June 2017). The Kamai and Hammatt (2017) report summarizes the historical background of the area and previous archaeological studies. It indicates that portions of the current project area are within the boundaries of three previous archaeological inventory surveys conducted in Keālia: Phase I (Drennan et al. 2006), Phase II (Drennan and Dega (2007a), and Phase IV (Drennan and Dega (2007b)).

The Drennan et al. (2006) report included a 450-acre portion of a 2,008-acre property and documented 19 historic properties, of which 15 occur within the current project area and 4 occur outside. The 15 inside the current project area (Site 50-30-08-3943 through 3957) consist of 21 features, of which nine date to the plantation era, one is a traditional agricultural/habitation site, and the remaining 5 are interpreted as traditional Hawaiian agricultural sites that continued to be used into the 19th century. Each of the 15 documented historic sites were evaluated as significant under Criterion d (information potential) pursuant to Hawaii Administrative Rule (HAR) §13-284-6.

The Drennan and Dega (2007a) report included a 386-acre portion of a 2,008-acre property. The AIS documented 30 historic properties with 82 features, including a traditional habitation complex (Site 50-30-08-3959) with a buried human skeletal fragment, a burial (Site 3960) and several plantation-era associated artifacts. Of the 28 plantation-era sites, the New Kumukumu Camp (Site 7013) and a railroad complex (Site 7016) are located within the current 53.361-acre project area. Both were assessed as significant under Criterion d.

The Drennan and Dega (2007b) report included a 562-acre portion of a 2008-acre property; a portion of the current 53.61-acre parcel was included in the northwest portion of the survey. The AIS newly documented 37 historic properties with 66 features including water control features, a petroglyph, a bridge, several rock mounds, culverts, animal husbandry artifacts, agricultural terraces, and historic trash deposits (Sites 50-30-08-1100 through 50-30-08-1130). Each was assessed as significant under Criterion d.

Daniel E. Orodenker
May 29, 2018
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During the Kamai and Hammatt (2017) field inspection, five features were newly documented. These features were identified as being associated with the New Kumukumu Camp (Site 50-30-08-7013), including a transportation alignment (CSH-1), a concrete slab (CSH-2), concrete posts (CSH-3A and 3B), basalt and mortar water culverts (CSH-4A and 4B), and a large rectangular concrete foundation (CSH-5). The report recommends further consultation with SHPD regarding appropriate documentation of historic properties within the current project area.

Based on the information provided, **SHPD's comments are as follows:**

- (1) **SHPD has no objection to the *Petition for Land Use District Boundary Amendment*** to reclassify approximately 53.361-acres of land from agricultural district to urban district.
- (2) **SHPD requests** an AIS with a subsurface testing component be completed for the current 53.61-acre project area prior to permit issuance.

SHPD's request for a new AIS is based on the results of the Kamai and Hammatt (2017) field inspection, which indicates that the prior AIS studies did not adequately document all surface historic properties. Subsurface testing was not conducted within the footprint of the proposed residential development. Additionally, it remains unclear whether all historic roads have been adequately identified and inventoried.

The AIS shall be conducted by a qualified archaeologist in order to adequately identify and document any archaeological historic properties that may be present, to assess their significance, to determine the potential impacts of this project on any identified archaeological historic properties, and to identify and ensure appropriate mitigation is implemented, if needed. A list of permitted archaeological firms is provided on the SHPD website at: <http://dlnr.hawaii.gov/shpd/about/branches/archaeology/>.

SHPD requests the project proponent and archaeological firm consult with our office regarding an appropriate testing strategy prior to initiation of the AIS.

SHPD shall notify the LUC when the required reports and/or plans have been reviewed and accepted and project work may proceed.

Please contact Dr. Susan A. Lebo, Archaeology Branch Chief at Susan.A.Lebo@hawaii.gov or at (808) 692-8019 for any questions regarding this letter.

Aloha,
Alan Downer

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

cc: Chance Bukoski, cbukoski@kauai.gov
Kaaina Hull, khull@kauai.gov