

Hakoda, Riley K

From: Orodener, Daniel E
Sent: Monday, October 1, 2018 12:00 PM
To: Hakoda, Riley K
Subject: Fwd: Docket No. A17-803/Kealia Properties, LLC
Attachments: 4-4-7-004_2018-00602_1805GC09_ARCHY_6E8_PRMT_AIS_REQ.pdf; ATT00001.htm

Daniel Orodener

Begin forwarded message:

From: "Lebo, Susan A" <susan.a.lebo@hawaii.gov>
Date: September 30, 2018 at 10:53:17 AM HST
To: "Orodener, Daniel E" <daniel.e.oroedener@hawaii.gov>, "Downer, Alan S" <alan.s.downer@hawaii.gov>, Hallett Hammatt <HHammatt@culturalsurveys.com>
Subject: FW: Docket No. A17-803/Kealia Properties, LLC

Hello Mr. Orodener,

This email is in response to your recent letter dated September 21, 2018 (SHPD Log No. 2018.02272) received by our office on September 26, 2018.

Attached is SHPD response to Docket No. A17-803/Kealia Properties, LLC which our office sent your office and several other County offices on May 29, 2018.

Please let me know if you have any additional questions.

Sincerely,

Susan

Susan A. Lebo, PhD
Archaeology Branch Chief
State Historic Preservation Division
Department of Land and Natural Resources
Kakuhihewa Building, Suite 555
Kapolei, HI 96707
(808) 692-8019
Susan.A.Lebo@hawaii.gov

From: Lebo, Susan A
Sent: Tuesday, May 29, 2018 5:14 PM
To: Orodener, Daniel E <daniel.e.oroedener@hawaii.gov>
Cc: 'cbukoski@kauai.gov' <cbukoski@kauai.gov>; Kaaina Hull <khull@kauai.gov>; Clark, Garnet K

<garnet.k.clark@hawaii.gov>

Subject: Docket No. A17-803/Kealia Properties, LLC

Hello,

Attached is a pdf copy of our division's review of the following submittal:

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

Sincerely,

Susan

Susan A. Lebo, PhD
Archaeology Branch Chief
State Historic Preservation Division
Department of Land and Natural Resources
Kakuhihewa Building, Suite 555
Kapolei, HI 96707
(808) 692-8019
Susan.A.Lebo@hawaii.gov

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
601 KAMOKILA BLVD, STE 555
KAPOLEI, HAWAII 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2018

Daniel E. Orodenker, Executive Officer
Land Use Commission, State of Hawaii
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, HI 96813
Daniel.E.Orodenker@hawaii.gov

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**

2018 OCT - 1 P
LAND USE COMMISSION
STATE OF HAWAII

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. Orodener
May 29, 2018
Page 2

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