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**Subject:** Second DEA KoKua Place Project Comments  
**Date:** Monday, December 10, 2018 8:37:04 AM

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## Section 4.21 Environmental Setting

You have some information in here that is wrong or not worded correctly. An archaeological assessment is an assessment not an AIS when you find no historic properties in the project or parcel. When you find historic properties it becomes an AIS. SHPD wanted subsurface testing which was done. No historic properties were found during this testing nor during the surface field inspection. So the second paragraph is wrong in the DEA.

Here is SHPD letter. I highlighted where is it an AIS now AA because no sites. This section should be in place of the third paragraph on page 32.

Thank you for the opportunity to review the revised draft reports titled *An Archaeological Assessment with Subsurface Testing for the Proposed Kapa'a Highlands Phase II Project, Kawaihau District, Kaua'i TMK: (4) 4-3-003:001* (McMahon and Tolleson). We received the first revised draft on September 27, 2013 (Log No. 2013.5628), the second on January 2014 (Log No. 2014.00035), and final revisions, including Figure 9, on March 26, 2014. SHPD made several requests that an archaeological inventory survey including subsurface testing be conducted on the property due to the identification of historic properties on nearby parcels including TMK: (4) 4-3-003:004, 005 (June 28, 2010, Log No. 2010.2441, Doc. No. 1006MV50; and October 1, 2012, Log No. 2012.1541, Doc. No. 1209SL24). **The current AIS yielded no historic properties and was re-designated an archaeological assessment pursuant to Hawai'i Administrative Rules (HAR) §13-284-5.**

The archaeological inventory survey (AIS) was conducted on behalf of Three Stooges LLC in support of a residential subdivision development on a 97-acre property. The AIS involved a 100% pedestrian survey and subsurface testing consisting of excavation of three backhoe trenches. No previously- or newly-identified historic properties were documented in the project area. The project area was assessed as having been extensively subjected to sugar cane plantation agriculture and to now be void of any surface plantation architecture or infrastructure remnants and to lack evidence of subsurface cultural deposits below the agricultural zone.

The revisions adequately address the issues and concerns raised in our earlier correspondence (October 1, 2012; Log No. 2012.1541, Doc. No. 1209SL24) and in our consultations. The revised report provides adequate discussion of the project location, environs, cultural and historical background, previous investigations, field methods, and findings. The report meets the standards set forth in HAR §13-276-5. It is accepted by SHPD. Please send one hardcopy of the document, clearly marked **FINAL**, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention SHPD Library.