

RC-0153

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LAND
STATE PARKS

November 17, 2003

Robert Rechtman, Ph.D.
Rechtman Consultant Services, Inc.
HC1, Box 4149
Kea`au, Hawaii 96749

LOG NO: 2003.2356
DOC NO: 0311PM04

Dear Dr. Rechtman:

**SUBJECT: Chapter 6E-42 Historic Preservation Review of a Final Report RC-0153:
“An Archaeological Inventory Survey of TMK's: 3-7-5-10:85 and 3-7-5-
17:06” (Clark and Rechtman 2003)
Wai`aha, North Kona, Hawaii Island**

Thank you for the opportunity to review and comment on the above referenced draft report, which was received in our office August 20, 2003. The report was revised to address the comments in our review letter of May 7, 2003 (Log No. 2003. 0238; Doc. No. 0304PM05).

As indicated in our previous letter, we believe that the archaeological inventory survey of the roughly 62-acre project area was adequate in terms of the identification of significant historic sites. One previously identified site (the Kuakini Wall) and 25 new sites were identified in the survey.

In our review of the first draft report we also concurred with your proposed site significance evaluations and recommended site treatments. All 26 sites in the project area have yielded information important for an understanding of local prehistory or history and are thus significant under Criterion “d.” Five sites are significant under multiple criteria. These include the Kuakini Wall site (6302), three burial sites (23683, 23684, and 23685), and one ceremonial site (23681). All five of the sites evaluated as significant under multiple criteria are recommended for preservation. Ten sites are recommended for data recovery. No further work is recommended for the other eleven sites, which include all of the historic ranch walls, the two trail segments, and two of the sites interpreted as temporary habitations.

Your letter notes that you have made all of the revisions to the report we had requested, except for eight specific comments that are discussed in your letter. We will accept your explanations for why you couldn't address these particular comments, but with regard to your comment about previously approved reports, you realize, of course, that approval of a report does not mean that

Robert Rechtman, Ph.D.

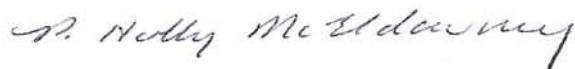
Page 2

we accept or approve of all of the information or conclusions contained in a report. We still do not agree, for example, with your definition of features and we don't believe that "landscape markers" is a particularly useful umbrella term for such things as cairns and walls, including ranch walls.

Your report meets with our approval. The next step in the historic preservation review process is the preparation and implementation of a data recovery plan, a preservation plan, and a burial treatment plan for sites in the project area.

As a reminder, you need to remember to submit a second copy of all reports, plans, and correspondence to our Kona office. In the future we will not begin a review unless the Kona office has a copy. If you or your client should have any questions about this project please contact our Hawaii Island archaeologist, Patrick McCoy, at 692-8029.

Aloha,



P. Holly McEldowney, Acting Administrator
State Historic Preservation Division

- c. Chris Yuen, County of Hawaii Planning Department
- Kai Emler, County of Hawaii Department of Public Works
- Kai Markell, SHPD Burial Sites Program
- Mary Lou Kobayashi, Office of Planning
- Anthony Ching, Land Use Commission

PM:ak