

Appendix D3

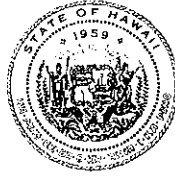
Chapter 6E-8 Historic Preservation Review, Correspondence Between LUC and SHPD

Correspondence Related to LRFI

- 1. LUC Letter to SHPD, February 27, 2018**
- 2. SHPD Letter to LUC, May 29, 2018, Log No. 2018.00602, Doc No. 1805GC09**
- 3. LUC Letter to SHPD, September 21, 2018**
- 4. SHPD Letter to LUC, October 3, 2018, Log No. 2018.00602, Doc No. 1810DB01**

Correspondence Related to AIS Report

- 5. LUC Letter to SHPD, April 17, 2019 transmitting AIS Report**
- 6. SHPD Letter to LUC, May 29, 2019, Log. No. 2018.00602, Doc No. 1805GC09**
- 7. SHPD Letter to LUC, June 10, 2019, Log No. 2019.00892, Doc No. 1906DB01**
- 8. LUC Letter to LUC, June 25, 2019, transmitting revised Draft AIS Report**
- 9. Cultural Surveys Hawai'i letter to LUC, June 25, 2019, with Comment Table**



DAVID Y. IGE
Governor

DANIEL E. ORODENKER
Executive Officer

LUIS P. SALAVERIA
Director
MARY ALICE EVANS
Deputy Director

LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

February 27, 2018

Dr. Alan S. Downer, Administrator
State Historic Preservation Division
Department Land and Natural Resources
Kākuhihewa Bldg., Suite 555
601 Kamōkila Boulevard
Kapolei, Hawai'i 96707

Subject: Docket No. A17-803/Kealia Properties, LLC
Keālia Mauka Homesites, Keālia Ahupua'a, Kawaihau District, Kaua'i
Tax Map Key: (4) 4-7-004: por. 001

Dear Dr. Downer:

On October 16, 2017, Keālia Properties, LLC, filed a Petition for Land Use District Boundary Amendment to reclassify approximately 53.361 acres of land from the State Land Use Agricultural District to the State Land Use Urban District for the Keālia Mauka Homesites project at Keālia Ahupua'a, Kawaihau District, Kaua'i, Tax Map Key: (4) 4-7-004: por 001 (Petition Area).

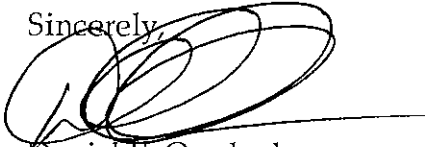
We understand that State Historic Preservation Division (SHPD) Archaeology Branch Chief Dr. Susan Lebo has been involved in a relatively recent review of the Petition Area.

As you may know, the Petition Area was part of a prior archaeological inventory survey (AIS) (Drennan et al. 2006) that recommended no further archaeological work. At this time, we request confirmation from the SHPD that the 53.361-acre Petition Area has been reasonably addressed in the prior AIS, and that the requirements of Hawai'i Revised Statutes Section 6E have been met. To assist you in your review, we have enclosed the document entitled *Draft Archaeological Literature Review and Field Inspection Report for the Keālia Subdivision Project, Keālia Ahupua'a, Kawaihau District, Kaua'i, TMKs: [4] 4-7-004: por. 001* (Kamai and Hammatt 2017).

Dr. Alan S. Downer, Administrator
February 27, 2018
Page 2

Thank you for your assistance in this matter. Should you have any questions or require further clarification, please call our office at 587-3822.

Sincerely,

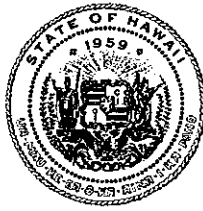
A handwritten signature in black ink, appearing to read "Daniel E. Orodener", written over a horizontal line.

Daniel E. Orodener
Executive Officer

c: Benjamin M. Matsubara, Esq. (w/o enclosure)
Leslie Kurisaki (w/o enclosure)

Enclosure

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
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SUZANNE D. CASE
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CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2018

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

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.

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



DAVID Y. IGE
Governor

DANIEL E. ORODENKER
Executive Officer

LUIS P. SALAVERIA
Director
MARY ALICE EVANS
Deputy Director

LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

September 21, 2018

Dr. Alan S. Downer, Administrator
State Historic Preservation Division
Department of Land and Natural Resources
Kākuhihewa Bldg., Suite 555
601 Kamōkila Boulevard
Kapolei, Hawai'i 96707

Subject: Docket No. A17-803/Kealia Properties, LLC
Keālia Mauka Homesites, Keālia Ahupua`a, Kawaihau District, Kaua`i
Tax Map Key: (4) 4-7-004: por. 001

Dear Dr. Downer:


By letter dated February 27, 2018, we requested confirmation from the State Historic Preservation Division (SHPD) as to whether the 53.361-acre Petition Area in the subject docket had been reasonably addressed in a prior Archaeological Inventory Survey (Drennan et al. 2006), and that the requirements of Hawai'i Revised Statutes Section 6E had been met.

We understood that SHPD Archaeology Branch Chief Dr. Susan Lebo had been involved in a relatively recent review of the Petition Area.

To date, we have not received a response to our letter. Given that the matter is related to the processing of an environmental impact statement for the above project, we would appreciate it if your staff could review the matter as soon as possible.

Thank you for your assistance in this matter. Should you have any questions or require further clarification, please call our office at 587-3822.

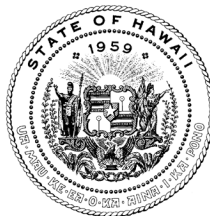
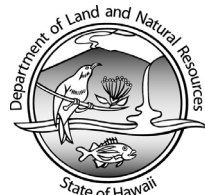
Sincerely,



Daniel E. Orodanker
Executive Officer

c: Benjamin M. Matsubara, Esq.
Leslie Kurisaki

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
601 KAMOKILA BOULEVARD, ROOM 555
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SUZANNE D. CASE
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

October 3, 2018

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

IN REPLY REFER TO:
Log No. 2018.00602
Doc. No. 1810DB01
Archaeology

Dear Daniel Orodener:

**SUBJECT: Chapter 6E-8 Historic Preservation Review – REVISED COMMENTS
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.* On May 29, 2018 SHPD sent a letter to the LUC outlining comments on the aforementioned review items (Log No. 2018.00602, Doc. No. 1805GC09).

The submittal included an *Archaeological Literature Review and Field Inspection Report* (Kamai and Hammatt, June 2017) which included a summary of the historical background of the area and previous archaeological studies. The report indicates that portions of the current project area are within the boundaries of three previous archaeological inventory survey (AIS) investigations 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.

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 and Archaeological Monitoring Plan (AMP) be completed for the current 53.61-acre project area.

SHPD's request for a supplemental 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.

SHPD has agreed to the supplemental AIS strategy provided by the project proponent and contracted archaeological firm and to their proposed initiation of the AIS on September 4, 2018. This includes the understanding that no subsurface testing will be required based on documentation provided in the Kamai and Hammatt (2017) Literature Review and Field Inspection report. In addition, SHPD has agreed that an Archaeological Monitoring Plan (AMP) shall be created and approved prior to the start of project work by the project proponent.

SHPD shall notify the LUC when the AIS is accepted and the LUC permit may be issued.

Please contact David Buckley, Kaua'i Lead Archaeologist, at David.Buckley@hawaii.gov for any questions regarding this letter.

Mahalo,



Susan A. Lebo, PhD
Archaeology Branch Chief

cc: Bert Saruwatari, LUC, bert.k.saruwatari@hawaii.gov
Hallett Hammatt, CSH Inc., hhammatt@culturalsurveys.com
Missy Kamai, CSH Inc., mkamai@culturalsurveys.com
Scott Ezer, HHF Planners, sezer@hhf.com

DAVID Y. IGE
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MIKE McCARTNEY
Director



DANIEL E. ORODENKER
Executive Officer

LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

April 17, 2019

Dr. Alan S. Downer, SHPD Administrator
DLNR—State Historic Preservation Division
Kākuhihewa Bldg., Suite 555
601 Kamōkila Boulevard
Kapolei, Hawai'i 96707

Subject: Docket No. A17-803/Keālia Properties, LLC
Keālia Mauka Homesites, Keālia Ahupua`a, Kawaihau District, Kaua`i
Tax Map Key: (4) 4-7-004: por. 001
*DRAFT Archaeological Inventory Survey Report for the Proposed Keālia
Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa`a
Ahupua`a, Kawaihau District, Kaua`i, TMKs: [4] 4-6-014 por. Kūhiō
Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road
and Kūhiō Highway Right-of-Ways; 4-7-004:001 por. (Kamai et al. 2019)
submitted for HRS 6E-8 review*

Dear Dr. Downer:

The State of Hawai'i Land Use Commission ("LUC") respectfully submits the above-referenced AIS report for State Historic Preservation Division ("SHPD") review and acceptance.

Project Background

On October 16, 2017, Keālia Properties, LLC ("Petitioner") filed a Petition for Land Use District Boundary Amendment ("Petition") to reclassify approximately 53.4 acres of land ("Petition Area") from the State Land Use Agricultural District to the State Land Use Urban District at Keālia Ahupua`a, Kawaihau District, Kaua`i. Petitioner is proposing to develop the Keālia Mauka Homesites, a 235-lot residential subdivision within the Petition Area.

In addition to construction of the subdivision, Petitioner proposes "off-site" infrastructure improvements to support the project. These off-site

improvements include widening and installation of sidewalk on Keālia Road; construction of a roundabout at the Keālia Road-Kūhiō Highway intersection; and the installation of a sewer main extension along Keālia Road and Kūhiō Highway. These improvements will be constructed outside of the Petition Area and are proposed within the roadway rights-of-way. The off-site improvement areas are not part of the Petition Area.

Prior LUC Correspondence with SHPD

On February 27, 2018, the LUC sent a letter to SHPD transmitting a Draft Archaeological Literature Review and Field Inspection Report that had been prepared for the project (Kamai and Hammatt 2017). In its letter, the LUC requested SHPD confirmation that the 53.4-acre Petition Area had been reasonably addressed in a prior AIS (Drennon et al. 2006), and that the requirements of Hawaii Revised Statutes Section 6E had been met.

In April 2018, a Draft Environmental Impact Statement ("DEIS") for the Keālia Mauka Homesites project was published in support of the Petition. At the time the DEIS was published, no response to the February 27, 2018, letter had been received from SHPD. The DEIS noted that a response from SHPD was still pending.

On May 29, 2018, after SHPD Archaeology Branch Chief Dr. Susan Lebo's review of the Petition Area, the LUC received a letter (Log No. 2018.00602; Doc No. 1805GC09) that provided the 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.*" SHPD's 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. (Log No. 2018.00602; Doc No. 1805GC09, Page 2)

SHPD also requested that the project proponent and archaeological firm consult with its office regarding an appropriate testing strategy prior to initiation of the AIS (Log No. 2018.00602; Doc No. 1805GC09, page 2). Meetings were conducted between SHPD, the project proponent, and the archaeological firm on September 26, 2018, and October 2, 2018, at SHPD's Kapolei office.

Preparation of Draft AIS

Following these meetings, AIS field work was conducted and the enclosed Draft AIS report was prepared. In addition to further recording of the features of SIHP #-07013 (Kumukumu Camp) in the Petition Area, the AIS expanded its survey area to include off-site project areas. Specifically, a pedestrian survey was conducted along the corridor of the proposed sewer line, running along Keālia Road from the Petition Area to Kūhiō Highway, and along the mauka side of Kūhiō Highway to the vicinity of the Kaiakea Fire Station. This was an area encompassing approximately 21.3 acres (in addition to the 53.4-acre Petition Area). Previously identified historic properties in the vicinity of the off-site areas were also reviewed and addressed in the report.

The attached *DRAFT Archaeological Inventory Survey Report for the Proposed Keālia Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa`a Ahupua`a, Kawaihau District, Kaua`i, TMKs: [4] 4-6-014 por. Kūhiō Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-Ways; 4-7-004:001 por.* (Kamai et al. 2019) is submitted for SHPD review.

Request for SHPD Review, AIS Acceptance and Concurrence with Determination

The LUC hereby transmits the Draft AIS referenced above for SHPD review and acceptance. We are also requesting SHPD concurrence with the project's effect on historic properties with a determination of "effect, with agreed upon mitigation commitments," pursuant to HRS Chapter 6E-42 and HAR 13-284-7. Mitigation will include an archaeological monitoring plan to be submitted to SHPD for review/acceptance prior to any site work and construction.

Attached are the link to the Draft AIS as well as the PDF files of the HRS 6E Submittal Filing Fee Form and SHPD letter requesting the AIS. The HRS 6E Submittal Form was previously submitted to your office with the LRFI for

Dr. Alan S. Downer, SHPD Administrator

April 17, 2019

Page 4

the project. We understand that the archaeological consultant will be hand delivering the HRS 6E Submittal Filing Fee form and check to cover the filing fee once the consultant receives the log number. These materials are additional submittals associated with existing Log No. 2018.000722.

The project's point of contact at the LUC is:

Daniel E. Orodenker, Executive Officer
Land Use Commission. State of Hawai'i
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawai'i 96813
daniel.e.orozenker@hawaii.gov

Please send copies of all correspondence to Petitioner's representative:

Scott Ezer
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813
sezer@hhf.com

If you have any questions or comments, please feel free to call our office at 587-3822.

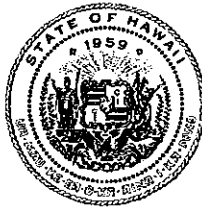
Sincerely,

A handwritten signature in dark ink, consisting of several loops and a long horizontal stroke extending to the right.

Daniel E. Orodenker
Executive Officer

Att.

DAVID Y. IGE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
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601 KAMOKILA BLVD, STE 555
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SUZANNE D. CASE
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COMMISSION ON WATER RESOURCE MANAGEMENT

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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

May 29, 2018

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

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.

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.

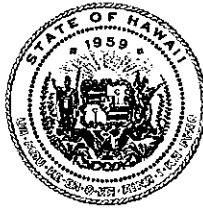
Aloha,

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

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
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SUZANNE D. CASE
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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

June 10, 2019

Daniel E. Orodener, Executive Officer
Land Use Commission, State of Hawai'i
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawai'i 96813
Daniel.E.Orodener@hawaii.gov

IN REPLY REFER TO:
Log No. 2019.00892
Doc. No. 1906DB01
Archaeology

Dear Mr. Orodener:

**SUBJECT: HRS Chapter 6E-42 Historic Preservation Review --
Docket No. A17-803/Kealia Properties, LLC
Archaeological Inventory Survey Report for the Proposed
Keālia Mauka Homesites and Associated Sewer Line Project
Keālia and Kapa'a Ahupua'a, Kawaihau District, Island of Kaua'i
TMK: (4) 4-6-014 por., (4) 4-7-003:002 por., (4)4-7-004:001 por., and Kūhiō Highway and
Mailihuna Road ROW and Keālia Road and Kūhiō Highway ROW**

This letter provides the State Historic Preservation Division's (SHPD's) review of the subject archaeological document prepared by Cultural Surveys Hawai'i, Inc. (CSH) in support of the proposed Land Use Commission (LUC) amendments. The SHPD received on April 22, 2019, the document titled *Draft Archaeological Inventory Survey Report for the Proposed Keālia Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa'a Ahupua'a, Kawaihau District, Kaua'i* [TMKs: (4) 4-6-014 por. Kūhiō Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-Ways; 4-7-004:001:001 por.] (Kamai et al. April 2019). This archaeological inventory survey (AIS) was submitted to the SHPD, along with a submittal letter from the LUC dated April 17, 2019, which requested the SHPD review and accept the AIS report and the SHPD's concurrence with the LUC's project effect determination of "effect, with agreed upon mitigation commitments," pursuant to HRS Chapter 6E-42 and HAR §13-284-7. Mitigation would be in the form of archaeological monitoring and an archaeological monitoring plan would be submitted to the SHPD for review and acceptance prior to any site work and construction.

The SHPD requested the subject AIS in a letter dated May 29, 2018 (Log No. 2018.00602, Doc No. 1805GC09). In that letter, SHPD indicated 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. Additionally, SHPD requested an AIS with a subsurface testing component be completed for the current 53.61-acre project area prior to permit issuance. Subsequent correspondence between CSH and SHPD included meetings on September 26, 2018 and October 2, 2018, in which SHPD requested the inclusion of the proposed sewer line corridor, further recording of associated features of State Inventory of Historic Places (SIHP) # 50-30-08-07013 (Kumukumu Camp), assessment of integrity and site significance, and mitigation recommendations within a supplemental AIS.

The Keālia Mauka Homesites project (74.7 total acres) on the former sugarcane agricultural land includes grading and utility infrastructure installment for a residential community development (53.4 acres) that will include the construction of 235 single-family house lots and a park. A sewer line will be installed (21.3-acre corridor) from the home sites down Keālia Road to Kūhiō Highway, then along the highway to the existing county sewer system in Kapa'a.

The project area is comprised of the Keālia Mauka Homesites and an associated sewer line corridor. The homesites area is bounded by Kumukumu Ahupua'a to the north, Kūhiō Highway to the east, former sugarcane fields to the west, and Keālia Town Tract subdivision to the south. The sewer line corridor extends from the southwest corner of the homesites, proceeds east down Keālia Road to Kūhiō Highway, then along Kūhiō Highway to the Kaiakea Fire Station at the south. Keālia Farms, Kapa'a Homesteads, and St. Catherine's Cemetery are to the west (or mauka; inland) of the sewer line corridor as is the intersection of Mailihuna Road and Kūhiō Highway. The sewer line crosses Kapa'a Stream on the Kapa'a Bridge.

The SHPD's request for the current AIS was based on the results of the Kamai and Hammatt (2017) field inspection, which indicated that the prior archaeological studies had not adequately document all surface historic properties, subsurface testing was not conducted within the footprint of the proposed residential development, and it remained unclear whether all historic roads have been adequately identified and inventoried. Prior studies within portions of the project area include Drennan et al. (2006), Drennan and Dega (2007a, 2007b), and Kamai and Hammatt (2017).

Fieldwork for the current AIS was conducted on October 15, 2018, January 11, 2019, and February 27, 2019. No excavations were conducted, no cultural materials or middens were collected during this AIS, and no laboratory work was conducted.

The AIS indicates thirteen previously-identified historic properties (including seven features), and one newly-identified historic property have been documented within the project area; however the AIS only summarizes 13 total sites, not 14. Additionally, two sites are assigned the same #, SIHP #50-30-0884 (burial sites) and SIHP # 50-30-08-0884 (cultural habitation layer). The 13 sites consist of:

SIHP # 50-30-08-0884, a burial site (Bushnell et al. 2003);
SIHP # 50-30-08-0884, a cultural habitation layer (Dega and Powell 2003);
SIHP # 50-30-08-2161, burial site of secondarily deposited bone fragments, collected and relocated (Dega and Powell 2003);
SIHP # 50-30-08-2162, burial site of skeletal fragments and cultural habitation layer, collected and relocated (Dega and Powell 2003);
SIHP # 50-30-08-2163, fire pit (Dega and Powell 2003);
SIHP # 50-30-08-2165, habitation layer (Dega and Powell 2003);
SIHP # 50-30-08-2278, Kapa'a stream bridge (Belluomini et al. 2018);
SIHP # 50-30-08-2279, water control ditch and culvert (Belluomini et al. 2018);
SIHP # 50-30-08-07013, New Kumukumu Camp, Features 1 through 5 (Drennan and Dega 2007a);
SIHP # 50-30-08-07015, railroad rails and foundation (Drennan and Dega 2007a);
SIHP # 50-30-08-07021 Features 5 and 6, culvert and Pipe (Drennan and Dega 2007a);
SIHP # 50-30-08-07035, stair (Drennan et al. 2007)
SIHP # 50-30-08-CSH 5 and Feature 5A (temporary site number), Keālia Road and backslope retaining wall (Kamai et al. 2019)

The SHPD requests a number of revisions prior to the report's approval in order to satisfy the requirements of HAR §13-276-5. The attachment identifies the issues and concerns. To aid in rapid, **SHPD requests the LUC submit the revised report to DLNR.Intake.SHPD@hawaii.gov** along with cover letter that specifies the changes made to the document and the page numbers in the revised report where these changes were made, and with the changes highlighted in the text.

Please contact David Buckley, Kaua'i Lead Archaeologist, at David.Buckley@hawaii.gov for any questions regarding this letter.

Mahalo,
Alan Downer

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

cc: Chance Bukoski, cbukoski@kauai.gov
Kaaaina Hull, khull@kauai.gov
Scott Ezer, HHF Planners, sezer@hhf.com
Missy Kamai, CSH, Inc., mkamai@culturalsurveys.com
William Folk, CSH, Inc., wfolk@culturalsurveys.com
Hallet Hammatt, CSH, Inc., hhammatt@culturalsurveys.com

Attachment

Revisions and Comments: *Draft Archaeological Inventory Survey Report for the Proposed Keālia Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa'a Ahupua'a, Kawaihau District, Kaua'i [TMKs: (4) 4-6-014 por., Kūhiō Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-Ways; 4-7-004:001:001 por.]* (Kamai et al. April 2019).

1. Copy edit report to address misspelled words, punctuation, and other grammatical errors. Check title – Rights-of-Way versus Right-of-Ways.
2. Page i. Project Location, next to last sentence. Fix Kapa'a to Kapa'a.
3. Page ii. Regulatory Context. This is a private project. HAR §13-275 does not apply. Please delete.
4. Page ii. Historic Properties Identified. You indicate total of 14 historic properties, but only 13 are listed. You indicate one newly identified including one features. Please change features to feature. You indicate SIHP # 2162 is a "burial site of skeletal fragments cultural habitation layer, collected and relocated." This doesn't make sense. Is it a burial site & a cultural layer? How can the cultural layer be collected and relocated? Table 4 identifies this site as a secondary and primary cultural deposit with associated human remains.
5. Please coordinate with SHPD to assign a SIHP Site # for "CSH 5" and "CSH 5A".
6. Page iii. Historic Property Significance. Remove leading zeros in 0884, 07015, 07016, 07021; no leading zeros are included in other site #s or, if you use leading zeros in rest of report include them here for all sites; be consistent. Add period at end of last sentence.
7. Page iii. Mitigation Commitments. Mitigation in the form of archaeological monitoring is for the entire project/project area, not for one or several specified sites. Please revise.
8. Page v. Fix formatting for Appendix A.
9. Page 1, paragraph 1. Change TMKs: multiple to list the TMKs in full. Reader should not have to go to report cover to identify appropriate TMKs.
10. Page 1, paragraph 2. This is a project, not a project undertaking. If this project is going to include HUD or other federal funding, indicate this.
11. Page 1, paragraph 2. Provide more details as to "scope of work" by including estimated depths of excavation for both The Keālia Mauka Homesites project area (consisting of the 235 single-family house lots and park) and the associated sewer line. Additionally, add sentence here to indicate project area includes the proposed sewer line corridor shown in Figure 1 and be sure that project area acreage includes this sewer line corridor.
12. Page 1, paragraph 4. Fix text. What is project area of Drennan and Dega? Do you mean "...project area (Drennan and Dega 2007a)"? This paragraph does not make sense. 4 historic properties were identified by Drennan and Dega 2007a, of which two are in the current project area or in the sewer line corridor for the current project area?
13. Page 1, paragraph 5. Please correct SCS to Scientific Consultant..., not Consulting.
14. Page 1, paragraph 6. Change Kumukumu Camp to be consistent throughout report. On page iii you identify it as "New Kumukumu Camp." Also fix discussion of significance and integrity. These are not two separate assessments – HAR 13-284-6 requires you to assess which of the 7 aspects of integrity are present in order to define the "character-defining" features that make the historic property significant. Sentence should read "evaluation of integrity and significance, mitigation recommendations for the entirety of the project area, including the sewer line project corridor. Additionally, you cannot state "the original 2007 AIS" by Drennan and Dega as it really is Drennan and Dega 2007a and 2007b.
15. Page 2. Fix page numbering, as there are two pages labeled Page 1.
16. Page 2. Figure 2. This figure really doesn't show all the TMK with labels. Where are the TMK boundaries? Additionally, the project TMK are identified as (4) 4-6-014 por., 4-7-003:002 por., and 4-7-004:001 por. Where is TMK (4) 4-7-004:001? Where are the labels for the roads included in the project area?
17. Page 12, paragraph 3. Insert SIHP # for newly identified site. Also provide information on GPS – what equipment used, accuracy, and where points were taken. You provide equipment for CSH 5 and Feature 5A documentation but

provide no info on whether GPS points were taken for the previously identified sites and, if so, where and if not, why not.

18. Page 24, paragraph 1. Provide additional details/differentiating between the Māhele, Kuleana Act of 1850, and Alien Land Ownership Act of 1850. The Kuleana Act is what provided the process for commoners to petition for land, while the Alien Land Ownership Act is what allowed foreigners to acquire land.
19. Page 26. Why different font for Figure 10 caption? See Figure 11. Actually inconsistency elsewhere also.
20. Pages 33-35, Figures 15-18 Captions. Add directional information for described photos in caption.
21. Page 37, Figure 20 Caption. Add directional information in photo description.
22. Page 39, Figure 21 Caption. Add directional information in photo description.
23. Page 40, Figure 22 Caption. Add directional information in photo description.
24. Page 44, paragraph 3 – Contemporary Land Use, line 9. Change “(Figure 25 and Figure 27)” to “(Figure 25 through Figure 27)”.
25. Page 48. All site #s introduced for the first time in text should be full Site #s, e.g., SIHP # -B002. Fix other errors, e.g., Drennan and Dega 2007, Phase II should be 2007a; -7013 reference should be 2007b not 200.
26. Page 51. Drennan and Dega 2007a. Should read “six plantation-era historic properties were newly identified...” Page 52. Drennan and Dega 2007b. Should read “...IV, 37 historic properties were newly identified, comprised of 66...; no such thing as a new historic property. Make same change on page 58, para 4, and all other locations in text.
27. Page 57. Fix formatting in Reference column of Table 4. You also list -7015 as a.k.a. -7038. Please provide explanation in text.
28. Page 58. See Comment #6 above. You have SIHP # -0884 in paragraph 1 but SIHP # -884 in paragraph 2. Be consistent.
29. Page 60, paragraph 1. See Comment # 14 above. Text should be revised to match and more accurately reflect what was requested. Sentence should read “evaluation of integrity and significance, mitigation recommendations for the entirety of the project area, including the sewer line project corridor.
30. Page 60, paragraph 3. Change to (SIHP #s 50-30-08-02165, 50-30-08-02163).
31. **Page 61. In the Results of Fieldwork section, please discuss why no excavations were conducted during the AIS, as the SHPD letter, dated May 29, 2018, requested an AIS with subsurface testing.**
32. Page 61. Discuss type of recordation and field methodology (GPS documentation, photos, profiles, other documentation and standards) for historic properties, included in the AIS.
33. Page 6, paragraph 7. Here, and all other appropriate locations, provide correct citation of Drennan and Dega as 2007a or 2007b. There is no 2007.
34. Page 62, paragraph 1. What is a tournohauler road?
35. Page 62, paragraph 3. Add space between 2nd and 3rd paragraphs.
36. Page 63, Table 5. Why are sites listed -0884 in Table 4, but 0884 in Table 5? Why not same format?
37. Page 65, para 3. Date should be 210 not 21O. all numbers, not capital O.
38. Page 70, last paragraph. Drennan and Dega 2007 should be 2007a or 2007b.
39. Page 75, Figure 37 Caption. Add directional information in photo description.
40. Pages 73-81. For Features 1-5 of SIHP # 50-30-08-07013 (within each site description section), reference that integrity and significance assessments can be found in Section 6.
41. Page 90, Figure 55 Caption. Add reference notation in caption. Was it also from Drennan and Dega 2007a or 2007b?
42. Page 95 and 97. Please coordinate with SHPD to assign a proper SIHP Site # for “CSH 5”, and “CSH 5A”. Insert space between SIHP 7035 paragraph and SIHP XXX paragraph. SIHP -7035 should be -07035. Be consistent.
43. Page 97, paragraph 2, line 1. After “agrees”, add “with the recommendation that”.
44. Page 97, paragraph 2. Reference integrity assessment of CSH 5 in Section 6.
45. Pages 102-105. Discuss mitigation recommendations with SHPD Archaeology Branch Chief and Kauai Lead Archaeologist.
46. Page 106, paragraph 1. Add period to end of paragraph.
47. Page 106, paragraph 2, line 4. Before “Monitoring”, add “Full-time”, and after, “implemented”, add “and conducted by qualified personnel”
48. Page 106, paragraph 2, line 8. Change “HAR §13-279” to “HAR §13-279-4.” Additionally, discuss monitoring commitment with SHPD Archaeology Branch Chief and Kauai Lead Archaeologist. Why is monitoring only being recommended for limited locations and not entirety of project area, particularly in light of no subsurface testing? Additionally, discussion needs to include whether all sites recommended for no further work have been sufficiently documented or not.

DAVID Y. IGE
Governor

MIKE MCCARTNEY
Director



DANIEL E. ORODENKER
Executive Officer

LAND USE COMMISSION
Department of Business, Economic Development & Tourism
State of Hawai'i

June 25, 2019

Dr. Alan S. Downer, SHPD Administrator
DLNR—State Historic Preservation Division
Kākuhihewa Bldg., Suite 555
601 Kamōkila Boulevard
Kapolei, Hawai'i 96707

Subject: Docket No. A17-803/Keālia Properties, LLC
Keālia Mauka Homesites and Associated Sewer Line Project, Keālia
Ahupua'a, Kawaihau District, Kaua'i Tax Map Key: (4) 4-7-004: por. 001
(Petition Area);
Kūhiō Highway and Mailihuna Road Rights-of-Way, 4-7-003:002 por. Keālia
Road and Kūhiō Highway Rights-of-Way, 4-7-004:001 por (Off-site Utility
Improvements)

*Revised Draft Archaeological Inventory Survey Report for the Proposed Keālia
Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa'a Ahupua'a,
Kawaihau District, Kaua'i, TMKs: [4] 4-6-014 por. Kūhiō Highway and Mailihuna
Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-
Ways; 4-7-004:001 por. (June 2019)*

Dear Dr. Downer:

The State of Hawai'i Land Use Commission ("LUC") respectfully submits the above-referenced revised Draft AIS report dated June 2019 for State Historic Preservation Division ("SHPD") review and acceptance. At the LUC's request, Cultural Surveys Hawai'i provided the revised Draft AIS via SharePoint link, sent to the SHPD intake site on June 24, 2019 (LOG 2019.01421).

We have enclosed a letter from Cultural Surveys Hawai'i with a comment table, which summarizes SHPD's April 2019 comments, the revisions made, and the pages on which they were made. As requested, changes are highlighted in the text of the June 2019 revised Draft AIS report. Both the revised Draft AIS and the comment table summary can be downloaded using the following link:

Dr. Alan S. Downer, SHPD Administrator
June 25, 2019
Page 2

https://culturalsurveys.sharepoint.com/:f/g/EuewDiJk5vNGqMK2xuh7jt4BL7XupOVngi_57K7dV8njOw

The revised Draft AIS (June 2019) is a resubmittal of an April 2019 Draft AIS of the same name, which we transmitted to you by letter dated April 17, 2019. In a June 10, 2019, review letter (Log No. 2019.00892, Doc. No. 1906DB01), SHPD requested a number of revisions to the April 2019 report prior to its approval to satisfy the requirements of HAR §13-276-5.

With the submittal of the revised Draft AIS, the LUC anticipates SHPD concurrence with the project's effect on historic properties with a determination of "effect, with agreed upon mitigation commitments," pursuant to Hawai'i Revised Statutes Chapter 6E-42 and Hawai'i Administrative Rules 13-284-7. Mitigation will include an archaeological monitoring plan to be developed in consultation with SHPD and submitted to SHPD for review/acceptance prior to any site work and construction.

The project's point of contact at LUC is:

Daniel E. Orodener, Executive Officer
Land Use Commission. State of Hawai'i
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawai'i 96813
daniel.e.oroedner@hawaii.gov

Please send copies of all correspondence to Petitioner's representative:

Scott Ezer
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813
sezer@hhf.com

If you have any questions or comments, please feel free to call our office at 587-3822.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel E. Orodener", followed by a horizontal line.

Daniel E. Orodener
Executive Officer

Attachments

CULTURAL SURVEYS HAWAII

ARCHAEOLOGICAL, CULTURAL, AND HISTORICAL DOCUMENTATION SERVICES — SINCE 1982

25 June 2019

Dr. Alan S. Downer, SHPD Administrator
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Fax: (808) 692-8020
Alan.S.Downer@hawaii.gov

CSH Job Code: KEALIA 4

Subject: revised Draft *Archaeological Inventory Survey Report for the Proposed Keālia Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa'a Ahupua'a, Kawaihau District, Kaua'i* [TMKs: (4) 4-6-014 por. Kūhiō Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-Ways; 4-7-004:001:001 por.] (Kamai et al. April 2019) submitted for review

Dear Dr. Alan Downer:

Thank you for the comments on our report. We are submitting a revised Draft *Archaeological Inventory Survey Report for the Proposed Keālia Mauka Homesites and Associated Sewer Line Project, Keālia and Kapa'a Ahupua'a, Kawaihau District, Kaua'i* [TMKs: (4) 4-6-014 por. Kūhiō Highway and Mailihuna Road Right-of-Ways; 4-7-003:002 por. Keālia Road and Kūhiō Highway Right-of-Ways; 4-7-004:001:001 por.] (Kamai et al. June 2019) for your review.

This revised version of the report reflects the changes requested in your letter dated 10 July 2019 (LOG NO: 2019.00892, DOC NO: 1906DB01), as detailed in the attached table.

If you have any questions or comments, please feel free to call me at (808) 262-9972 or toll free at 1-800-599-9962. You may also reach me by e-mail at dshideler@culturalsurveys.com.

Thank you,



William Folk
Cultural Surveys Hawai'i, Inc.



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Suite 114
Līhu'e, HI 96766
Ph. (808) 245-9374

Date: 21 June 2019

[illegible]

Date: 21 June 2019

| Comm # | Summary of Comments | Description of Changes | Page #/Section |
|---------------|--|--|-----------------------|
| 6 | Page iii. Historic Property Significance. Remove leading zeros in 0884, 07015, 07016, 07021; no leading zeros are included in other site #s or, if you use leading zeros in rest of report include them here for all sites; be consistent. Add period at end of last sentence. | Removed zero prefix with site numbers 884, 7015, 7016, 7021. Corrected missing period | p.iii |
| 7 | Page iii. Mitigation Commitments. Mitigation in the form of archaeological monitoring is for the entire project/project area, not for one or several specified sites. Please revise. | Revised. Removed text relating to specific sites. | p.iii |
| 8 | Page v. Fix formatting for Appendix A. | Corrected format issue. | p.v |
| 9 | Page 1, paragraph 1. Change TMKs: multiple to list the TMKs in full. Reader should not have to go to report cover to identify appropriate TMKs. | Corrected | p.1 |
| 10 | Page 1, paragraph 2. This is a project, not a project undertaking. If this project is going to include HUD or other federal funding, indicate this. | Deleted the word undertaking | p.1 |

Date: 21 June 2019

| Comm # | Summary of Comments | Description of Changes | Page #/Section |
|---------------|---|---|---|
| 11 | Page 1, paragraph 2. Provide more detail as to “scope of work” by including estimated depths of excavations for both The Keālia Mauka Homesites project area (consisting of the 235 single-family house lots and park) and the associated sewer line. Additionally, add sentence here to indicate project area includes the proposed sewer line corridor shown in Figure 1 and be sure that project area acreage includes this sewer line corridor. | Added text on project excavation depths Reworded sentence to emphasize the house sites and sewer comprise the project area. Added acreage breakdown | p.1; Sect. 1.1, paragraph 2 p.1; paragraph 2 p.1; paragraph 3 |
| 12 | Page 1, paragraph 4. Fix text. What is project area of Drennan and Dega? Do you mean “...project area (Drennan and Dega 2007a)”? This paragraph does not make sense. 4 historic properties were identified by Drennan and Dega 2007a, of which 2 are in the current project area or in the sewer line corridor for the current project area? | Text fixed. | p.1; Sect. 1.1; p.52; Noted in Table 3 in Drennen et al. 2006 and Drennan and Dega 2007a |
| 13 | Page 1, paragraph 5. Please correct SCS to Scientific Consultant ..., not Consulting. | Corrected | p.1; paragraph 5 |

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| 14 | <p>Page 1, paragraph 6. Change Kumukumu Camp to be consistent throughout report. On page iii you identify it as “New Kumukumu Camp.” Also fix discussion of significance and integrity. These are not two separate assessments – HAR 13-284-6 requires you to assess which of the 7 aspects of integrity are present in order to define the “character-defining” features that make the historic property significant. Sentence should read “evaluation of integrity and significance, mitigation recommendations for the entirety of the project area, including the sewer line project corridor. Additionally, you cannot state “the original 2007 AIS” by Drennan and Dega as it really is Drennan and Dega 2007a and 2007b.</p> | <p>Made consistent</p> <p>Corrected assessment of integrity and significance using suggested wording</p> <p>Corrected reference to include Dega 2007a and 2007b.</p> | <p>Multiple pages</p> <p>p.7; paragraph 1</p> |
| 15 | <p>Page 2. Fix page numbering, as there are two pages labeled Page 1.</p> | <p>Corrected page numbering error</p> | <p>p.1</p> |
| 16 | <p>Page 2. Figure 2. This figure really doesn’t show all the TMK with labels. Where are the TMK boundaries? Additionally, the project TMK are identified as (4) 4-6-014 por., 4-7-003:002 por., and 4-7-004:001 por. Where is TMK (4) 4-7-04:001? Where are the labels for the roads included in the project area?</p> | <p>Added Parcel :001 and road names</p> | <p>p.3; fig. 2</p> |

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| 17 | Page 12, paragraph 3. Insert SIHP # for newly identified site. Also provide information on GPS – what equipment used, accuracy, and where points were taken. You provide equipment for CSH 5 and Feature 5A documentation but provide no info on whether GPS points were taken for the previously identified sites and, if so, where and if not, why not. | Waiting on SIHP number assignment Related GPS equipment and that most other previously documented sites are underground. | p.13 and 14 |
| 18 | Page 24, paragraph 1. Provide additional details/differentiation between the Māhele, Kuleana Act of 1850, and Alien Land Ownership Act is what allowed foreigners to acquire land. | Additional details added | p.26; Sect. 3.3.1 |
| 19 | Page 26. Why different font for Figure 10 caption? See Figure 11. Actually inconsistency elsewhere also. | Font consistent throughout | p. 27 |
| 20 | Page 33-35, Figures 15-18 Captions. Add directional information for described photos in caption. | Added directional information to photo captions | p.34-36; Fig. 15-18 |
| 21 | Page 37, Figure 20 Caption. Add directional information in photo description. | Added directional information to photo caption | p.38; Fig. 20 |
| 22 | Page 39, Figure 21 Caption. Add directional information in photo description. | Added directional information to photo caption | p.40; Fig .21 |
| 23 | Page 40, Figure 22 Caption. Add directional information in photo description. | Added directional information to photo caption | p.41; Fig. 22 |

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| 24 | Page 44, paragraph 3 – Contemporary Land Use, line 9. Change “(Figure 25 and Figure 27)” to “(Figure 25 through Figure 27)”. | Corrected | p.45 |
| 25 | Page 48. All site #s introduced for the first time in text should be full Site #s, e.g., SIHP # - B002. Fix other errors, e.g., Drennan and Dega 2007, Phase II should be 2007a; -7013 reference should be 2007b not 200. | Corrected Bishop Museum site number and explanation, Fixed other errors noted | p.49, Sect. 3.4.3; p.51; Table 3; p.57-58, Table 4 |
| 26 | Page 51. Drennan and Dega 2007a. Should read “six plantation-era historic properties were newly identified...” Page 52. Drennan and Dega 2007b. Should read “...IV, 37 historic properties were newly identified, comprised of 66...; no such thing as a new historic property. Make same change on page 58, para 4, and all other locations in text. | Revised text Revised text Revised text | p.52 p.53 p.51; 59-60; 103 |
| 27 | Page 57. Fix formatting in Reference column of Table 4. You also list - 7015 as a.k.a. -7038. Please provide explanation in text. | Margins in line Added comment that the rail system as various SIHP#’s Discussed at greater length in the description of SIHP# - 7015 | p.57 p.63; last paragraph p.83-88; Section 4.10 |
| 28 | Page 58. See Comment #6 above. You have SIHP # - 0884 in paragraph 1 but SIHP # -884 in paragraph 2. Be consistent. | Made site number consistent through the report text | Multiple pages |

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| 29 | Page 60, paragraph 1. See Comment # 14 above. Text should be revised to match and more accurately reflect what was requested. Sentence should read “evaluation of integrity and significance, mitigation recommendations for the entirety of the project area, including the sewer line project corridor. | Revised text in two locations | p. 62; Sect. 3.4.12 p.103 |
| 30 | Page 60, paragraph 3. Change to (SIHP #s 50-30-08-02165, 50-30-08-02163). | Changed all site numbers to be consistent number format | Throughout |
| 31 | Page 61. In the Results of Fieldwork section, please discuss why no excavations were conducted during the AIS, as the SHPD letter, dated May 29, 2018, requested an AIS with subsurface testing. | Related the agreement to conduct archaeological monitoring pursuant to approved plan rather than testing during the AIS | p.63; Sect. 4 |
| 32 | Page 61. Discuss type of recordation and field methodology (GPS documentation, photos, profiles, other documentation and standards) for historic properties, included in the AIS. | Added short paragraph on GPS specifics and Secretary of Interior standards | p. 63; Section 4 |
| 33 | Page 6, paragraph 7. Here, and all other appropriate locations, provide correct citation of Drennan and Dega as 2007a or 2007b. There is no 2007. | Check citations and corrected as needed | Multiple pages. |
| 34 | Page 62, paragraph 1. What is a tournahauler road? | Changed tournahauler to truck | p.64 |

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| 35 | Page 62, paragraph 3. Add space between 2 nd and 3 rd paragraphs. | Corrected paragraph formatting | p.64, last paragraph |
| 36 | Page 63, Table 5. Why are sites listed -0884 in Table 4, but 0884 in Table 5? Why not same format? | Correct to consistent format | p.57; Table 4 |
| 37 | Page 65, para 3. Date should be 210 not 21O. all numbers, not capital O. | Corrected. | p.52; Table 3 and p.66; Sect. 4.2 |
| 38 | Page 70, last paragraph. Drennan and Dega 2007 should be 2007a or 2007b. | Added information on recording of site 7013. | p.71 |
| 39 | Page 75, Figure 37 Caption. Add directional information in photo description. | Added photo orientation to caption | p.76; Fig. 37 |
| 40 | Pages 73-81. For Features 1-5 of SIHP # 50-30-08-07013 (within each site description section), reference that integrity and significance assessments can be found in Section 6. | Included integrity and significance for features of SIHP #-7013 and reference to Section 6 | p.74-83 |
| 41 | Page 90, Figure 55 Caption. Add reference notation in caption. Was it also from Drennan and Dega 2007a or 2007b? | Added CSH, W. Folk field drawings | p.91; Fig.55 |
| 42 | Page 95 and 97. Please coordinate with SHPD to assign a proper SIHP Site # for “CSH 5”, and “CSH 5A”. Insert space between SIHP 7035 paragraph and SIHP XXX paragraph. SIHP -7035 should be -07035. Be consistent. | New site numbers added | Throughout |
| | | Paragraph format corrected | p.96 |
| 43 | Page 97, paragraph 2, line 1. After “agrees”, add “with the recommendation that”. | Dropped zero from all SIHP numbers for consistency | Throughout |
| | | Added suggested text | p.108 |

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| 44 | Page 97, paragraph 2. Reference integrity assessment of CSH 5 in Section 6. | Included integrity and significance for features of SIHP #-2390 and -2391 and reference to Section 6 | p.96; Sect. 4.13 and 4.13.1 |
| 45 | Pages 102-105. Discuss mitigation recommendations with SHPD Archaeology Branch Chief and Kauai Lead Archaeologist. | Removed mitigation recommendations. To be addressed in mitigation plan with SHPD consultation | p.108, Sect. 7.2 |
| 46 | Page 106, paragraph 1. Add period to end of paragraph. | Added period | p.108 |
| 47 | Page 106, paragraph 2, line 4. Before “Monitoring”, add “Full-time”, and after, “implemented”, add “and conducted by qualified personnel” | Added requested text | p.108; Sect. 7.2 |
| 48 | Page 106, paragraph 2, line 8. Change “HAR §13-279” to “HAR §13-279-4.” Additionally, discuss monitoring commitment with SHPD Archaeology Branch Chief and Kauai Lead Archaeologist. Why is monitoring only being recommended for limited locations and not entirety of project area, particularly in light of no subsurface testing? Additionally, discussion needs to include whether all sites recommended for no further work have been sufficiently documented or not. | <p>Added HRS section paragraph number</p> <p>Monitoring commitment details to be addressed in mitigation plan in consultation with SHPD</p> <p>Monitoring location details have been deleted. The Monitoring plan will define the details of monitoring in consultation with and approval by SHPD</p> <p>Added text related to no further work</p> | <p>p.108;</p> <p>p.108; Sect. 7.2</p> <p>p.108</p> <p>throughout</p> |
