



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

December 12, 2019

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. A19-808/City and County of Honolulu, Department of
Environmental Services
'Ewa, O'ahu, Hawai'i
Tax Map Key: (1) 9-1-069: por. 003 and por. 004

Dear Dr. Downer:

On November 6, 2019, the City and County of Honolulu, Department of Environmental Services ("Petitioner"), filed a Petition for Land Use District Boundary Amendment ("Petition") to reclassify approximately 27.797 acres of land from the State Land Use Agricultural District to the State Land Use Urban District at 'Ewa, O'ahu, Hawai'i, identified as TMK: (1) 9-1-069: por. 003 and por. 004 ("Petition Area"). The Petition has been filed for the construction of secondary treatment and support facilities necessary to comply with secondary treatment standards for all wastewater discharges from the Honouliuli Wastewater Treatment Plant ("HWWTP"). Petitioner also simultaneously filed a Motion for Order Amending the Findings of Fact, Conclusions of Law and Decision and Order Filed May 8, 1989 to, among other things, bifurcate an adjacent 23.3-acre portion of land, identified as TMK: (1) 9-1-069: por. 003 ("Motion Area"), that was previously urbanized in Docket No. A88-627/Gentry Development Company as part of the Ewa by Gentry residential community and to include it as a portion of the HWWTP.

We understand that the undeveloped lands to the north and east of the HWWTP, including portions of the 27.797-acre Petition Area and the 23.3-acre Motion Area, were the subject of an archaeological assessment prepared by O'Hare et al. in 2007.

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By letter dated February 10, 2009, the State Historic Preservation Division ("SHPD") accepted this archaeological assessment. Cultural Surveys Hawai'i, Inc. ("CSH"), subsequently prepared an archaeological assessment dated December 2015, which included a reconnaissance of the O'Hare et al. study area and a pedestrian survey of the remaining southwestern portion of the property, including the built-up areas of the HWWTP. By letter dated February 3, 2016, the SHPD accepted this archaeological assessment.

No historic sites properties were identified in either the undeveloped lands to the north and east of the HWWTP or on the built-up areas of the HWWTP itself.

At this time, we request confirmation from the SHPD that the 27.797-acre Petition Area and the 23.3-acre Motion Area have been reasonably addressed in the abovementioned assessments, and that the requirements of Hawai'i Revised Statutes chapter 6E have been met. To assist you in your review, we have provided a link to the December 2015 archaeological assessment: <https://luc.hawaii.gov/wp-content/uploads/2019/11/Exhibit-5-Part-3LUC-A19-808.pdf>.

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

Sincerely,



Daniel E. Orodener
Executive Officer

c: Curtis T. Tabata, Esq.
Brad T. Saito, Esq.