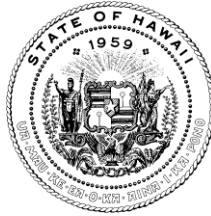


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STATE PARKS

August 4, 2020

Glen Ueno, Administrator  
County of Maui  
Department of Public Works  
Development Services Administration Division  
250 South High Street  
Wailuku, Maui, Hawai'i 96793

IN REPLY REFER TO:  
Log No.: 2020.01586  
Doc. No.: 2008AM02  
Archaeology

Dear Glen Ueno:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Miki Basin Industrial Park Project  
Archaeological Inventory Survey  
Kamoku Ahupua'a, Lāhaina District, Lāna'i Island  
TMK: (2) 4-9-002:061 por.**

This letter provides the State Historic Preservation Division's (SHPD) review of the draft report titled, *Archaeological Inventory Survey for the Miki Basin 200 Acre Industrial Development* (DiVito et al., May 2018), produced by T.S. Dye and Colleagues, Archaeologist, Inc. (TSD) for the Pūlama Lāna'i, Miki Basin Industrial Park project. SHPD received a draft environmental assessment (EA) report (Ho'okuleana LLC, June 2020) for the project on December 5, 2019 (Log No. 2019.02674) and a final EA report on July 8, 2020 along with a cover letter prepared on behalf of Pūlama Lāna'i, an HRS 6E Submittal Form, the subject archaeological inventory survey (AIS) report (Log No. 2020.01586).

The Miki Basin Industrial Park project is a 200-acre master-planned light and heavy industrial development on land adjoining the Lāna'i Airport, the Maui Electric Company (MECO) 5-acre power plant and the existing 20-acre Miki Basin Industrial Condominium. The current submittal does not include a permit set, however Pūlama Lāna'i indicates the proposed 200-acre Miki Basin Industrial Park is planned to be developed incrementally over a 30-year period.

TSD initially completed the subject AIS in 2016 (Log No. 2016.02655) and the report was subsequently withdrawn by Pūlama Lāna'i. TSD conducted additional archaeological work in the project area and presented the findings from both survey efforts in the current AIS report (DiVito et al., May 2018). The report indicates the AIS was conducted to identify historic properties and cultural materials in the project area to support a proposed zoning change and construction activities associated with the Miki Basin Industrial Park project.

The subject AIS report includes a detailed analysis of historic land use, cultural practices in the area, an artifact analysis section, a summary of previous archaeological investigations, and the results of the archaeological testing. The survey included a 100 percent coverage pedestrian survey of the project area conducted using transects spaced at 10-meter (m) intervals. Subsurface testing of the project area included the excavation of 31 backhoe trenches. The test trenches were excavated to 145 cm below ground surface, measured 3 to 4 m in length, and were each 1 m wide. The GPS data for the locations of each trench excavation was recorded and the locations are depicted on a map of the project area. The report includes soil descriptions using Munsell colors and USDA descriptions and attributes.

TSD identified two historic properties during AIS testing (Table 1). SIHP # 50-40-98-1980 is comprised of two features including a lithic scatter and an eroded exposed fire-pit. SIHP # 50-40-98-1981 is a subsurface truncated fire-pit feature. TSD assessed SIHP # 50-40-98-1980 and 50-40-98-1981 as significant for the information on Hawaiian history and prehistory that they have yielded. The report indicates the Miki Basin Industrial Park project will adversely impact both historic properties and it is recommended that data recovery excavation be conducted as mitigation for SIHP #s 50-40-98-1980 and 50-40-98-1981.

Table 1: Historic properties identified within the current project area.

SIHP # 50-40-98-	Formal Type	Significance Assessment	Description	Mitigation
1980	artifact scatter and fire-pit	d	Surface lithic scatter and exposed fire-pit	Data recovery
1981	fire-pit	d	Subsurface fire-pit (Backhoe Trench 21)	Data recovery (tested)

The report meets the minimum requirements of HAR §13-275-6. **It is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a copy of this acceptance letter and text-searchable PDF version of the report to the Kapolei SHPD office, attention SHPD Library. Additionally, please send a digital copy of the final AIS report (DiVito et al., May 2018) to [lehua.k.soares@hawaii.gov](mailto:lehua.k.soares@hawaii.gov).

The current submittal includes a cover letter from Pūlama Lānaʻi dated July 5, 2020 that requests an HRS 6E-42 project effect determination of “*effect, with proposed mitigation commitments,*” with mitigation in the form of data recovery. Honua Consulting recommends that a data recovery plan be developed for SIHP #s 50-40-98-1980 and 50-40-98-1981 and a program of archaeological monitoring for the Miki Basin Industrial Park project.

SHPD concurs with the significance assessments and mitigation recommendations for SIHP #s 50-40-98-1980 and 50-40-98-1981. However, the **SHPD notifies the County of Maui** that our office has not yet received a County permit submittal triggering an HRS 6E-42 review. Therefore, our division cannot make a project effect determination at this time.

**SHPD requests** to be consulted prior to the issuance of any permits associated with the Miki Basin Industrial Park project on the subject property, allowing our division the opportunity to review the proposed project and to make an HRS 6E project effect determination in accordance with HAR §13-284-3 and, if necessary, any appropriate mitigation.

Please contact Andrew McCallister, Historic Preservation Archaeologist IV, at [Andrew.McCallister@hawaii.gov](mailto:Andrew.McCallister@hawaii.gov) or at (808) 692-8010 for matters regarding archaeological resources or this letter.

Aloha,

**Alan Downer**

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

cc: Keiki-Pua S. Dancil, Pūlama Lānaʻi, [kdancil@pulamalanai.com](mailto:kdancil@pulamalanai.com)  
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