




**SHPD CHAPTER 6E-42
HISTORIC PRESERVATION
REVIEW**

APPENDIX

D-1





STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEVA BUILDING
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STATE HISTORIC PRESERVATION
DIVISION
LAND AND NATURAL RESOURCES
COMMISSION

August 14, 2020

Glen Ueno, Administrator

County of Maui

Department of Public Works

Development Services Administration Division

250 South High Street

Wailuku, Maui, Hawaii 96793

Dear Mr. Ueno:

SUBJECT:

Chapter 6E-42 Historic Preservation Review –

Hokiao 201-H Housing Project

Grading and Grubbing Permit Application – G T20190219

Archaeological Inventory Survey Report (Dye and Maly 2018)

Archaeological Field Inspection End-of-Fieldwork Report (Thurman 2019)

Kamoku Ahupua'a, Lahaina District, Island of Maui

TMK: (2) 4-9-002:061 por., (2) 4-9-002:001 por., 009 por., and 011 por.

This letter provides the State Historic Preservation Division's (SHPD) review of the draft archaeological inventory survey (AIS) report titled, *Archaeological Inventory Survey for the Proposed Hokiao 201-H Residential Project Land of Kamoku, Lahaina District, Maui* (TMK: (2) 4-9-002:061 por., TMK: (2) 4-9-014:001 por., TMK: (2) 4-9-014:009 por., and TMK: (2) 4-9-014:011 por. (Dye and Maly 2018) and associated grading permit application G T20190219. SHPD received the subject permit application submittals (Table 1), including a cover letter, a SHPD HRS 6E Submittal Form, a TMK map of the project area, a permit set, and an archaeological field inspection End-of-Fieldwork report (Thurman, December 2019). SHPD received the subject draft AIS on February 1, 2019 (Log No. 2019.00221), and an end-of-field report on January 3, 2020 (Log No. 2020.00018).

Table 1. Summary of Submittal Associated with the Hokiao 201-H Housing Project:

Grading Permit #	Description	SHPD Log No.	Intake Date
G T2019/0219	Hokiao mass grading	2019.02740	12/18/2019
G T2019/0219	AIS for the proposed project	2019.00221	02/01/2019
G T2019/0219	Field Inspection End-of-Fieldwork Summary Report	2020.00018	01/03/2020

Pūlana Lāna'i proposes the construction of 200 single-family homes, including 102 affordable homes and 98 market rate homes within a 68.86-acre project area located in Kamoku Ahupua'a. According to the submittals, the project area was originally planned to cover 105 acres and has been reduced to 68.86 acres. Project-related ground disturbance work will include mass grading of the 68.86 acres, including 105,000 cubic yards of excavation. The project area will be grubbed to a maximum of 12 ft. deep and filled a maximum of 13 ft. in height. Mass grading will consist of grubbing and grading to create leveled residential pads (i.e., terraces and bank slopes) and will be stabilized with grass. Hammatt and Borthwick (1993) and Lee-Greig and Hammatt (2009) previously conducted AIS investigations on the subject property and the project areas had some overlap. The SHPD accepted the AIS (Lee-Greig and Hammatt 2009) in a letter dated November 16, 2009 (Log No. 2009.4362, Doc. No. 0911PC28).

Hammatt and Borthwick (1993)

The Hammatt and Borthwick survey (1993) identified no historic properties within the project area. The survey consisted of a 100- to 150-ft-wide wastewater corridor connecting the Lāna'i sewage treatment plant with the Kō'ele

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Golf Course irrigation system. The route of the corridor ran north-south through the northeastern portion of the project area. At the time of the survey the entire project area consisted of excellent surface visibility due to low vegetation growth.

Lee-Greig and Hammatt (2009)

Cultural Surveys Hawai'i, Inc. (CSH) conducted an AIS (Lee-Greig and Hammatt 2009) for an adjacent parcel along the north-northeastern boundary of the current 68.86-acre project area and identified a historic-era culvert headwall (SIHP 50-40-98-6649) located within the northeastern corner of the current project area. CSH determined the culvert headwall (SIHP 50-40-98-6649) to be significant under Criterion "d" and recommended no further work for the site. In addition, CSH recorded two historic properties located outside of the CSH's project area but within the current project area. CSH documented two historic school buildings, the Kō'ele Grammar School and the Palawai School House, identified as CSH-2 and CSH-3 (Structure A [both buildings] of the Kō'ele District (SIHP 50-40-98-1004). Both structures were relocated within the Hokiao 201-H Housing project area around 1985-1986, at the bottom of Ninth Street, and intended for preservation, restoration, and incorporation into the landscape at Kō'ele. The AIS report assesses the condition of the structures of being in extreme disrepair but significant under Criterion "d." The AIS included five test trenches, two of which (BT-2 and BT-3) were within the current project area. No cultural materials or historic properties were identified during the test trenching portion of the AIS. The SHPD accepted the AIS report in a letter dated November 16, 2009 (Log No. 2009.4362, Doc. No. 0911PC28). SHPD concurred with the report's recommendation that SIHP 50-50-098-6649 is significant under Criterion "d" and that no further historic preservation work is necessary. SHPD additionally agreed that archaeological monitoring be conducted during all ground disturbance activities associated with the proposed project.

T.S. Dye & Colleagues (Dye and Maly 2018)

At the request of Pūlana Lāna'i, T.S. Dye & Colleagues (Dye and Maly 2018) conducted an AIS including twenty-six backhoe test trench excavations and a surface survey of the original 105-acre project area for the Hokiao 201-H Housing project. The AIS was not requested by SHPD for the subject project, rather it was initiated at the request of the project proponent in advance of the project. The subject AIS report includes a description of the pedestrian survey and indicates a 100 percent surface inspection was not accomplished for the entire project area. The AIS newly identified one historic property and further documented two previously identified during the Lee-Greig and Hammatt (2009) AIS (Table 2).

Table 2: Significant historic properties within the current project area.

SIHP # 50-40-98	Formal Type	Description and Temporal Association	Significance	Mitigation Recommendation
-1004 (Structural A)	Kō'ele Grammar School	Feature component to the Kō'ele District (SIHP # -1004). Two-room schoolhouse built in 1927 (also referred to as the Boy Scout Hall).	d	No further work (demolished)
-1004 (Structural A)	Palawai School	Feature component to the Kō'ele District (SIHP # -1004). Single-room schoolhouse built in 1910 (also referred to as Palawai School & Richardson House)	d	No further work (demolished)
-02000	Pineapple Harvester	Historic-era pineapple harvester	a	Preservation (Relocation, restoration, and interpretive display)
-6649	Historic Culvert Headwall	Culvert headwall constructed of cut basalt rocks with mortar, inscribed 1949.	d	No further work (Avoidance)

The historic properties include a Dole pineapple harvester (SIHP 50-40-98-02000) and two wood-frame buildings from the Kō'ele School complex (Structure A of SIHP 50-40-98-1004). The SIHP 50-40-98-1004 school structures and the harvester were transported into the project area for preservation. Dye and Maly (2018) determine the Dole pineapple harvester (SIHP 50-40-98-02000) was significant under Criterion "a," due to its association with the seven decades of Lāna'i's plantation economic pursuit. The two-wooden school structures (Structure A of SIHP 50-40-98-1004) were documented to be in poor condition and overgrown by vegetation. The historic culvert headwall (SIHP 50-40-98-1004) was not documented during the Dye and Maly (2018) AIS. Based on the previous 105-acre project area, the culvert headwall was situated immediately outside of the northern boundary of the project area.

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Twenty-six test excavations (Test Pits 1-26) were conducted in places where, based on previous land use activities and historical data, it was assessed that potentially significant cultural deposits might exist. The test excavations averaged 2 meters long by 0.8 meters wide and more than 1 meter in depth and terminated within the natural subsurface. Most of the test excavations were conducted in the western portion of the original 105-acre project area due to the ongoing use of the Pūlama Lāna'i Nursery, the Community Gardens, and the green waste disposal areas. Seven test excavations (Test Pits 1, 5, 6, 7, 23, 24, and 25) are situated within the current 68.86-acre project area. No additional subsurface cultural deposits or historic properties were documented. The report indicates the project area was modified by heavy equipment during the establishment of Lāna'i City and commercial pineapple fields in the 1920s and recommends a project determination of "no effect on historic properties" and that the Dole pineapple harvester (SIHP 50-40-98-02000) could be moved from the proposed project area. Dye and Maly (2018) recommends no archaeological monitoring be required for the proposed project.

Field Inspection Report (Thurman, December 2019)

Honua Consulting conducted an archaeological field inspection of the four previously recorded historic properties within the Hōkūiao 201-H Housing project area and produced an end-of-field report (Thurman, December 2019). These historic properties included a Dole pineapple harvester (SIHP 50-40-98-02000), two-wooden school structures (Structure A of SIHP 50-40-98-1004), and a historical culvert headwall (SIHP 50-40-98-6649). The report includes a cover letter providing a summary of the previously recorded historic properties, the results of the 2018 field inspection, an updated GIS map showing the current 68.86-acre project area, and the Historic American Buildings Survey (HABS) documentation forms for the two-wooden school structures (Ruzicka 2017; Kō'ele Grammar School and Palawai School House, Structures A of SIHP 50-40-98-1004). The historical culvert headwall (SIHP 50-40-98-6649) and Dole pineapple harvester (SIHP 50-40-98-02000) were found to be in the same condition as previously described by Lee-Greig and Hammatt (2009). The two-wooden school structures (Structure A of SIHP 50-40-98-1004) were not relocated during the field inspection. The Historic American Building Survey reports (Mason Architects Inc., March 2017) indicates the survey was conducted to fulfill the County of Maui's recommendations for mitigation for the demolition of the two-wooden school structures (Ruzicka, March 2017). Lastly, the report does not provide any information regarding if additional pedestrian surveys were conducted during the field inspection.

The HABS reports were submitted to SHPD on October 12, 2018 (Log No. 2018.02441 and Log No. 2018.02442). The HABS reports were not requested by SHPD for the two school structures, rather this documentation was conducted at the request of the project proponent, no record was found that SHPD accepted the submittals, the HABS reports do not have a National Park Service (NPS) number, and do not appear to have been formally reviewed and accepted by NPS. Additionally, the former MECO powerplant situated adjacent to the wooden structures were subjected to demolition between August to November 2018 and have since been removed from the project area (Dr. Keiki-Pua Dancil [Pūlama Lāna'i] to 'Iolani Kauhane [SHPD] via email July 31, 2020). The field inspection confirmed the structures have been demolished and removed from the project area.

The AIS report meets the minimum requirements of an AIS as specified in HAR § 13-276-5. **It is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report to the Kapolei SHPD office, attention SHPD Library. Additionally, please send a pdf copy of the report to lehua.k.soares@hawaii.gov.

The AIS report (Dye and Maly 2018) and end-of-field report (Thurman, December 2019) recommend a determination of "no effect on historic properties" for the Hōkūiao 201-H Housing Project. However, as the AIS was conducted without a detailed scope of work guiding the testing strategy, the pedestrian survey transects were not spaced at a maximum of 5 meters apart, and portions of the project area were not adequately tested. Thus, SHPD has insufficient information to determine if the project's proposed mass grading will adversely affect historic properties within the current project area, particularly within areas proposed for deep excavation. Therefore, **SHPD requests archaeological monitoring** be conducted for identification purposes for all ground-disturbing activities during the proposed project and for the HABS reports to be completed per NPS standards.

Additionally, SHPD requests that the archaeological monitoring plan stipulate the short- and long-term interim protection measures for the Dole pineapple harvester (SIHP 50-40-98-02000) and the historic culvert head wall (SIHP 50-40-98-6649). The plan should indicate the Dole pineapple harvester (SIHP 50-40-98-02000) will be moved to a sheltered location prior to any ground disturbance activities and, if not possible, will be protected by interim protection measures to ensure it is not impacted by the proposed project. Additionally, the culvert headwall

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(SIHP 50-40-98-6649) will be avoided and not impacted by the proposed project. Pūlama Lāna'i has agreed to provide interim protection measures for the site including temporary fencing or flagging during the proposed project (Dr. Keiki-Pua Dancil [Pūlama Lāna'i] to 'Iolani Kauhane [SHPD] via email August 5, 2020)

Information about HABS can be found at: <https://www.nps.gov/hdp/standards/habsguidelines.htm>. Please contact Mary McPartland (mary_mcpartland@nps.gov) at the National Park Service to determine the level of the HABS report.

The HABS report is considered architectural survey report and therefore subject to filing fees per §13-284-4(a)(5), HAR. Please complete the filing fee form (<https://dlnr.hawaii.gov/shpd/files/2013/05/SubmittalFilingFees.pdf>) and a State Inventory of Historic Places Request Form (<http://dlnr.hawaii.gov/shpd/review-compliance/forms/>). The HABS report, filing fee form, and the SIHP form can be submitted concurrently to dlnr.intake.shpd@hawaii.gov.

SHPD looks forward to receiving for review and acceptance an archaeological monitoring plan meeting the requirements of HAR §13-279-4 and the final HABS reports prior to the initiation of the proposed project. Additionally, **SHPD requests** to review future building permits associated with the Hōkūiao 201-H Housing Project.

SHPD shall notify the County when the archaeological monitoring plan and the final HABS reports are accepted, and the permit issuance process may continue.

Please contact Tanya Gumpac-McGuire, Architecture Branch Chief, at Tanya.Gumpac-McGuire@hawaii.gov for concerns regarding architectural resources, and 'Iolani Kauhane, Historic Preservation Archaeologist III, at Iolani.Kauhane@hawaii.gov 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: County of Maui, building.permits@mauicounty.gov
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December 30, 2019

Susan A. Lebo, Ph.D.
Chief, Archaeology Branch
State Historic Preservation Division
Kakulihewa Building
601 Kamokila Blvd., Suite 555
Kapolei, Hawaiʻi 96706

SHPD LOG NO.
2019.00221

Subject: Hawaii Revised Statutes, Chapter 6E Review
Proposed Hōkūao 201-H Housing Project
Kamoku Ahupuaʻa, Lāhaina District, Lānaʻi Island
TMK: [2] 4-9-002:061 por., [2] 4-9-002:001 por., and [2] 4-9-002:009 por.

Dear Dr. Lebo,

Pūlama Lānaʻi (“applicant”) submits this letter to provide a project summary for the State Historic Preservation Division (SHPD) review per 6E-8, Hawaii Revised States (HRS) in connection with the following environmental assessment submitted by applicant Pūlama Lānaʻi for the proposed Hōkūao 201-H Housing Project, which includes the construction of 200 single family homes, including 102-affordable homes (priced at HRS Chapter 201-H guidelines) and 98-market rate homes, located in Kamoku Ahupuaʻa, Lāhaina District, Lānaʻi Island, TMK: [2] 4-9-002:001 por. The applicant also proposed to develop a one-acre park, a 1,500-square foot community center, comfort stations, and 100-parking stalls for use by the Hōkūao project residents.

Approvals Required: State Land Use Commission 201-H Affordable Housing Approval
Maui County Council 201-H Affordable Housing Application Approval
Maui County Department of Public Works Subdivision Approval
Maui County Department of Public Works Building Permits Approval

Introduction

At the request of Pūlama Lānaʻi, T. S. Dye & Colleagues, Archaeologists (TSD) completed an archaeological inventory survey of the proposed Hōkūao 201-H Residential Project (Dye and Maly 2018²). The proposed Hōkūao 201-H Residential Project currently intends to grade approximately 69 acres (ac.) in the land of Kamoku, Lāhaina District Lānaʻi Island. The irregularly shaped project area is located immediately west of and downslope from Lānaʻi City. The project area is bounded on the east by Fraser Avenue and two church parcels, on the north by 9th Avenue, which is an unimproved dirt road west of Fraser Avenue, and by a dirt road that follows tax map

¹ This AIS was not requested by the State Historic Preservation Division.
² Dye, Thomas S., Kepā Maly (2018) *Archaeological Inventory Survey for the Proposed Hōkūao 201-H Residential Project, Land of Kamoku, Lāhaina District, Lānaʻi Island*, TMK (2) 4-9-002:061 por., TMK (2) 4-9-014:001 por., TMK: (2) 4-9-014:009 por., and TMK: (2) 4-9-014:011 por. T. S. Dye & Colleagues, Archaeologists, Honolulu, Hawaiʻi.

boundaries. Most of the western boundary is marked by the chain-link fence boundary of the wastewater treatment plant, while the southern boundary follows 12th Avenue and Awalua Avenue. The proposed Hōkūao 201-H Residential Project is identified on tax maps as TMK: (2) 4-9-002:061 por., TMK: (2) 4-9-014:001 por., and TMK: (2) 4-9-014:009 por. The AIS was conducted based on a previous version of the plan, which also included TMK: (2) 4-9-014:011 por. Therefore, the AIS conducted by T.S. Dye & Associates, Archaeologists actually includes a total property area of 105 acres, whereas the proposed current project area falls within this limit.

In November 2019, at the request of the applicant, Honua Consulting’s staff archaeologist, Nathan DiVito, B.A. conducted a field check to confirm the current status of the property area and historic sites. An End of Fieldwork Report³ was completed which provides data on all previously recorded historic properties within the project area, fieldwork results, site evaluations, and mitigation recommendations.

Identification and Inventory of Historic Properties within the Project Area

In 2009, during a previous AIS conducted by Cultural Surveys Hawaiʻi for the Lānaʻi Affordable Housing Project, an historic culvert headwall (SIHP #50-40-98-6649) was documented within the current project area (Lee-Greig and Hammatt 2009)⁴. The headwall was constructed of four courses of cut basalt held together by fine sand aggregate mortar and it was inscribed with the date “1948” (Lee-Greig and Hammatt 2009:32). The culvert headwall was determined to likely be related to the expansion of Lānaʻi City and the development of the associated drainage system (Lee-Greig and Hammatt 2009:55). In addition, the study recorded two buildings outside their project area, including a two-room schoolhouse designated temporary site number CSH-2 and a one-room schoolhouse temporarily designated CSH-3. The study found the buildings to be part of the Kōʻele School Complex (Lee-Greig and Hammatt 2009:32).

Archaeological surface survey conducted during the 2018 AIS completed by TSD revealed the presence of three potentially significant historic properties within the proposed Hōkūao 201-H Residential Project, including a Dole Harvester “Machine 1” and two wood-frame buildings associated with the former Kōʻele School Complex (CSH-2 and CSH-3) (Dye and Maly 2018).

The Dole Harvester “Machine 1” was moved to its current location adjacent to the Recycle Center from the Miki area of southwestern Lānaʻi in March 2010. In practice, the harvester used a conveyor belt on long boom to transport the handpicked fruit to a bin on a flatbed truck. “Machine 1” is now in the possession of the Lānaʻi Culture & Heritage Center and physically located inside a fenced area that is open on three sides. There is heavy growth around the machine. Lānaʻi Culture

³ T.S. Dye & Colleagues, Archaeologists dissolved as a company in 2018 due to the retirement of the principal. The firm was in good standing with SHPD at the time of dissolution. The firm is no longer active and no longer holds an active archaeology permit with SHPD. Honua Consulting has been hired by the applicant to continue TSD’s projects on Lānaʻi.

⁴ Thurman, Rosanna (2019) End of Fieldwork Report to Susan Lebo at State Historic Preservation Division Regarding Proposed Hōkūao 201-H Housing Project, Kamoku Ahupuaʻa, Lāhaina District, Lānaʻi Island, TMK: [2] 4-9-002:061 por., [2] 4-9-002:001 por., and [2] 4-9-002:009 por. Honua Consulting, Honolulu, Hawaiʻi.

⁵ Lee-Greig, Tonya L. and Hallett H. Hammatt (2009) *An Archaeological Inventory Survey Report for the Proposed Lānaʻi City Affordable Housing Project, Kamoku Ahupuaʻa, Lāhaina District, Lānaʻi Island*, TMK (2) 4-9-002:058 and portions of (2) 4-9-014:001, 009, 011. Cultural Surveys Hawaiʻi, Wailuku, Hawaiʻi.

& Heritage Center assessed the condition of "Machine 1" around the time it was moved to its current location. The assessment found the main frame to be sound and the diesel engine repairable, but other components, such as the electrical system, elevator, boom, conveyors, counterweight, crown blower system, walkways, rails, ladders, platforms, operator station, and bin were in various states of disrepair. Several pieces were noted as missing, and rust, which was widespread, threatened the structural integrity of several components.

Four treatment options were considered for the pineapple harvester in the TSD assessment, including full restoration, stabilization, storage, and disposal. To date, the storage option has been followed, with the machine now enclosed with a chain-link fence but otherwise unprotected from the elements. The pineapple harvester was recently assessed in November 2019 by members from the Lānaʻi Culture & Heritage Center. The machine remains in similar condition to its 2010 condition, but it has continued to deteriorate. It is unlikely the machine can be restored to working condition. The group intends to move the machine from its current location within the project area and store it at an appropriate location for preservation purposes.

The two school buildings, CSH-2 and CSH-3, were documented in poor condition when they were initially described in 2009 (Lee-Greig and Hammatt 2009) and were not subsequently maintained. The photographs in Lee-Greig and Hammatt (2009) show dilapidated buildings in a field of short grass. When the AIS was conducted in 2018, the buildings were overgrown by vegetation and were in worse condition than they were in 2009 (Dye and Maly 2018). In 2017, Mason Architects completed Historic American Buildings Surveys (HABS) for both Kōʻele (Grammar) School (Lānaʻi City School; CSH 2)⁶ and Pālāwai School (Kōʻele School; John and Hannah Richardson House; CSH-3)⁷ buildings (Ruzicka 2017a and b).

The HABS for Kōʻele Grammar School (CSH-2) was submitted to SHPD on October 12, 2018. The Log No. for that submittal is 2018.02441. The HABS for Pālāwai School (CSH-3) was also submitted to SHPD on October 12, 2018. The SHPD Log No. is 2018.02442.

The two school buildings were subsequently demolished and are therefore no longer present within the project area.

No other historic properties were identified during the 2018 surface survey conducted by TSD.

Summary of TSD AIS

At the request of Pūlama Lānaʻi, TSD previously completed an archaeological inventory survey for the proposed Hōku-ao 201-H Residential Project, located at Kamoku, Lāhaina District, Lānaʻi Island. A review of the historical background indicates the entire 105 ac. project area was modified by heavy equipment during the establishment of Lānaʻi City and commercial pineapple fields in

⁶ Ruzicka, Dee (2017a) Historic American Buildings Survey Conducted for Koele Grammar School (Lana'i City School). Historic American Buildings Survey, U.S. Department of the Interior, National Park Service, Seattle, Washington.

⁷ Ruzicka, Dee (2017b) Historic American Buildings Survey Conducted for Palawai School (Koele School) (John and Hannah Richardson House). Historic American Buildings Survey, U.S. Department of the Interior, National Park Service, Seattle, Washington.

the 1920s. Previous archaeological inventory surveys on portions of the proposed Hōku-ao 201-H Residential Project and on lands adjacent to it failed to find traditional Hawaiian historic sites. The archaeological inventory survey included surface survey and test excavations.

During the TSD AIS, twenty-six test excavations were completed with a backhoe, Test Pits 1–26, situated throughout the proposed Hōku-ao 201-H Residential Project. The test pits were placed to cover the entire proposed Hōku-ao 201-H Residential Project; however, no test pits were excavated within the Pūlama Lānaʻi nursery operation or within the Community Garden area due to the ongoing use of these facilities. Instead, Test Pits 6–11 were placed around the perimeter of these two facilities for the purpose of determining whether or not they were established on typical soil profiles. Also, a reduced level of test excavation was carried out at the northern end of the proposed Hōku-ao 201-H Residential Project. This is an area that is used today for processing green waste and for storing large tanks of propane, and in the past housed industrial activities related to the pineapple plantation. Sparse vegetation growth and numerous push piles indicate that this area has recently experienced quite a bit of grading and earth moving. Test Pits 24 and 25 indicate the degree to which these modern activities have affected the landscape.

One of the main divisions of the proposed Hōku-ao 201-H Residential Project, from a historical point of view, is between the former pineapple fields on the west and the uncultivated area on the east between the former fields and Lānaʻi City. The test pits were placed to investigate both of these areas. Test Pits 1–4 were excavated east of the former pineapple fields and Test Pits 5–26 were excavated within the former pineapple fields. These excavations augment the two long trenches, BT-2 and BT-3, excavated within the proposed Hōku-ao 201-H Residential Project some years ago. BT-2 was excavated within the former pineapple fields and BT-3 was excavated east of them.

Finally, somewhat greater effort was expended at the southern end of the proposed Hōku-ao 201-H Residential Project, where Test Pits 15–18 were placed relatively close to one another. Vegetation here is better developed than in other parts of the former pineapple fields. The increased level of effort was designed to investigate whether this was related to a less intensive use of this area for pineapple cultivation in the hope that evidence of earlier uses might be preserved.

Summary of Historic Properties and Evaluation of Significance

Four sites have previously been documented within the Hōkuao 201-H Residential Project, located at Kamoku, Lāhaina District, Lānaʻi Island. Two historic schoolhouses were previously evaluated as significant under Criterion d (Lee-Greig and Hammatt 2009:32). However, the Dye and Maly (2018) study determined the buildings did not retain sufficient integrity to be eligible for listing on the State Register (Dye and Maly 2018:135). The buildings have since been demolished or moved off the property. Honua Consulting conducted a field check of the property in November 2019 and confirmed the buildings no longer exist on the property.

A pineapple harvester, "Machine 1," in the possession of the Lānaʻi Culture & Heritage Center. The AIS completed by TSD did not include an integrity assessment for the Doie pineapple harvester, yet nonetheless found "Machine 1" to possess sufficient integrity to proceed with a significance evaluation. Machine 1 was found to be eligible to the State Register for significance Criterion a, for its association with the commercial pineapple fields that for seven decades were

the primary economic pursuit on the island. It was also recommended the pineapple harvester be moved to a sheltered location, undergo restoration, and accompany an interpretive display (Dye and Maly 2018:135). At the request of Pūlama Lāna'i, Honua Consulting conducted an integrity assessment for the pineapple harvester, the results are presented below and also provided within the End of Fieldwork Report.

One historic culvert headwall (SIHP # -6649) was documented by Lee-Greig and Hammatt (2009) within the current project area. The study determined the site was eligible for the State Register under significance Criterion d, due to its potential to yield information important for understanding the history of the region. The study determined the site was sufficiently documented and no further work was recommended (Lee-Greig and Hammatt 2009:57-58). No assessment of site integrity was provided, therefore, Honua Consulting included an integrity assessment in the End of Fieldwork Report and the information is also presented below.

Integrity

Integrity is the ability of a property to convey its significance. To be potentially eligible for the state or national register of historic places, a property must be shown to be both significant and have integrity. There are seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association.

"Machine 1", the Dole Harvester, lacks integrity of location, as it was moved to its current location in 2010 and is not known to have operated in that location. The machine possesses integrity of design, as the machine is the last known machine to utilize this particular technology and design for its function and per both the 2010 and 2019 assessments, the machine is in disrepair but generally sound, although it is unlikely the machine could be restored to working condition. The machine lacks integrity of setting, as the current setting within the project area lacks the prerequisite character and surrounding features necessary to meet this threshold standard. While it is currently in a field, the field is overgrown and no longer used for agricultural purposes, which would have been the machine's original and historic setting. The machine possesses integrity of materials and workmanship, as the machine contains the unique physical elements and craft of Lāna'i's plantation period. It also retains integrity of feeling and association, for its ability to express the historic character of the plantation period and its direct link to that historic period.

The current study finds the historic culvert headwall (SIHP # -6649) to possess integrity of location as it is within its primary location and integrity of materials as it contains its original basalt construction stones and is in good condition.

Effect Determination

In consideration of its historic significance and the finding that the property does not possess integrity of location or setting, it is recommended that "Machine 1" be moved to a sheltered location away from the proposed Hōku-ao 201-H Residential Project prior to any construction activities and that funds for its restoration and interpretive display be pursued.

Based on the historic background, review of previous archaeology, results of the previous AIS, and the results of the contemporaneous field check conducted by Honua Consulting, if

"Machine 1" is relocated away from the proposed Hōku-ao 201-H Residential Project prior to any construction activities then the project will have an effect determination of "no historic properties affected".

Due to the extensive previous use of the land for commercial agriculture and industry, an archaeological monitoring program is not recommended for this project.

Conclusion

Per the guidelines set forth in Hawaii Administrative Rules Chapter 13-275 and based on the review and investigation conducted by T.S. Dye & Colleagues, Archaeologists and End of Field Report contemporaneously conducted by Honua Consulting, Honua Consulting is recommending and seeking SHPD concurrence on a determination of no historic properties affected. Based on the recommendation by T.S. Dye & Colleagues, Archaeologists, Honua Consulting is also not recommending archaeological monitoring for the project due to extensive previous use of the land in commercial and industrial agricultural activities; the applicant is seeking SHPD concurrence on this recommendation as well.

We thank you for your time and attention. If you have any questions, please feel free to contact Kēpā Maly at kmaly@pulumalanai.com or (808) 237-2001.

Respectfully submitted,



Kurt Matsumoto
Chief Operating Officer
Pūlama Lāna'i

Attachments

- A – End of Field Report
- B – HRS 6E Intake Form
- C - Archaeological Inventory Survey for the Proposed Hōku-ao 201-H Residential Project
- D – Historic American Building Surveys

STATE OF HAWAII)
) SS
CITY & COUNTY OF HONOLULU)


On this 2nd day of January, 2020, before me personally appeared Kurt Matsumoto, to me personally known, who, being by me duly sworn or affirmed, did say that such person executed the foregoing instrument as the free act and deed of such person, and if applicable in the capacity shown, having been duly authorized to execute such instrument in such capacity.



Print Name: Barbi S. Shimno
Notary Public, State of Hawaii



My commission expires: August 4th, 2022

Doc. Date: 12-30-19	# Pages: 7
Notary Name: Barbi S. Shimno	First Circuit
Doc. Description:	
Letter to SHPD, Hōkūāo 201-H Housing project TMK (214-9-002:061 (por.)) (214-9-002:001 (por.)) and (214-9-002:009 (por.))	
	1-2-20
Notary Signature	Date
NOTARY CERTIFICATION	

State Historic Preservation Division
HRS 6E Submittal Form

Per §6E, Hawai'i Revised Statutes, if the Project requires review by the State Historic Preservation Division (SHPD), please review and fill out this form and submit all requested information to SHPD. Please submit this form and project documentation **electronically** to:

dhr.intake.shpd@hawaii.gov

If you are unable to submit electronically, please contact SHPD at (808) 692-8015. Mahalo.

The submission date of this form is:

1. APPLICANT (select one)

Property Owner Government Agency

2. AGENCY (select one)

Planning Department Department of Public Works Other (specify):

Type of Permit Applied For: Grading/Utilities

3. APPLICANT CONTACT

3.1) Name: Kurt Matsumoto 3.2) Title: Chief Operating Officer
3.3) Street Address: 733 Bishop St Suite 2000
3.4) County: Honolulu 3.5) State: HI 3.6) Zip Code: 96813
3.7) Phone: (808)237-2001 3.8) Email: kmatsumoto@pulumalai.com

4. PROJECT DATA

4.1) Permit Number (if applicable):
4.2) TMK [e.g. (3)1-2-003-004]: 2-4-9-002: 061, 2-4-9-014:001, 009
4.3) Street Address: Fraser Ave., Lanai City, HI 96763
4.4) County: Maui 4.5) State: HI 4.6) Zip Code: 96763
4.7) Total Property Acreage: 16,252.51 Acres
4.8) Project Area (acreage, square feet): 68.86 Acres
4.9) List any previous SHPD correspondence (LOG Number & DOC Number, if applicable):

LOG NO. 2019.00221 DOC NO.

5. PROJECT INFORMATION

5.1) Does the Project involve a Historic Property? A Historic Property is any building, structure, object,

district, area, or site, including heiau and underwater site, **which is over 50 years old** (HRS §6E-2).

Yes No

5.2) The date(s) of construction for the historic property (building, structure, object, district, area, or site, including heiau and underwater site) is See attached End of Field Report, draft AIS, and HABS

5.3) Is the Property listed on the Hawai'i and or National Register of Historic Places? To check:
<http://dlnr.hawaii.gov/shpd/>

Yes No

5.4) Detailed Project Description and Scope of Work:

Hokuaio Mass Grading project consists of cuts and fills to create flat pads for future development (i.e. terraces and bank slopes). The lower regions of the site include excavated basins for storm water sediment control. The site will be stabilized with grass after grading is complete.

5.5) Description of previous ground disturbance (e.g. previous grading and grubbing):

Area has been used for pineapple cultivation in the past. Portions of the site are presently occupied with an electrical substation, community gardens and the Hawaii Gas baseyard.

5.6) Description of proposed ground disturbance (e.g. # of trenches, Length x Width x Depth):

The proposed mass grading will disturb approximately 69 acres of land and will have a maximum fill of 13 feet and a maximum cut of 12 feet. The overall project will excavate 105,000 cubic yards of material and embank the same material within the site.

5.7) The Agency shall ensure whether historic properties are present in the project area, and, if so, it shall ensure that these properties are properly identified and inventoried. Identify all known historic properties:

Two wood-frame buildings from the Ko'ele School complex - lack integrity (previously destroyed)

Pineapple harvester - "Machine 1" - documented within the End of Fieldwork report to have integrity of design, materials, workmanship, feel/mr and association and significance under Criterion a

5.8) Once a historic property is identified, then an assessment of significance shall occur.

Integrity (check all that apply):

Location Design Setting Materials Workmanship Feeling Association

Criteria (check all that apply):

a - associated with events that have made an important contribution to the broad patterns of our history

b - associated with the lives of persons important in our past

c - embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; or possess high artistic value

d - have yielded, or is likely to yield, information important for research on prehistory or history

e - have an important value to the Native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out or still carried out, at the property or due to associations with traditional beliefs, events, or oral accounts - - these associations being important to the group's history and cultural identity

5.9) The effects or impacts of a project on significant historic properties shall be determined by the agency.

Effect Determination (select one):

- No Historic Properties Affected
 Effect, with Agreed Upon Mitigation Commitments (§6E-4.2, HRS)
 Effect, with Proposed Mitigation Commitments (§6E-8, HRS)

5.10) This project is (check all that apply, if applicable): No federal nexus on this project.

an activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency;

carried out with Federal financial assistance; and or

requiring a Federal permit, license or approval.

If any of these boxes are checked, then the Project may also be subject to compliance with Section 106 of the National Historic Preservation Act (NHPA).

6. PROJECT SUBMITTALS

6.1) Please submit a copy of the Tax Map Key (TMK) map

6.2) Please submit a copy of the property map showing the project area and indicate if the project area is smaller than the property area.

6.3) Please submit a permit set of drawings. A permit set is a set of drawings prepared and signed by a licensed architect or engineer and is at least 65% complete.

6.4) Are you submitting a survey?

Yes No

Specify Survey: AIS for the Proposed Hokuaio 201-H Residential Project and End of Field Report

6.5) Did SHPD request the survey?

Yes No

If 'Yes', then please provide the date, SHPD LOG NO, and DOC NO:

Date: LOG NO. DOC NO.

6.6) **SURVEY REVIEW FEES.** Fee for Review of Reports and Plans (§§13-275-4 and 284-4). A filing fee will be charged for all reports and plans submitted to our office for review. Please go to:

<http://dlnr.hawaii.gov/shpd/about/branches/archaeology/filing-fee-schedule/>

A check payable to the Hawaii Historic Preservation Special Fund should accompany all reports or plans submitted.

6.7) Please submit color photos/images of the Historic Property (any building, structure, object, district, area, or site, including heiau and underwater site) that will be affected by the Project.

The following are the minimum number and type of color photographs required:

Quantity	Description
1-2	Street view(s) of the resource and surrounding area
1-2	Over view of exterior work area
1	exterior photo of the North elevation (if applicable)
1	exterior photo of the South elevation (if applicable)
1	exterior photo of the East elevation (if applicable)
1	exterior photo of the West elevation (if applicable)
1-2	interior photo(s) of areas affected (if applicable)

CHECKLIST

- SHPD FORM 6E** (this form)
- PROJECT SUBMITTALS** (any requested documentation for items 6.1 - 6.7 of this form)
- FILING FEE FORM** (if applicable)

