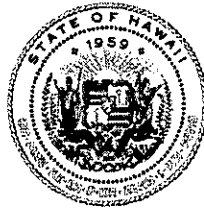
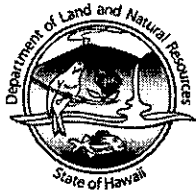


EXHIBIT 13

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
KAPOLEI, HI 96707

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

M. KALEO MANUEL
DEPUTY DIRECTOR - WATER

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
KAIJOLAWEE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

August 27, 2021

Rowena Dagdag-Andaya, Director
County of Maui
Department of Public Works (DPW)
200 S. High St.,
Kalama O Maui Bldg., 4th Floor
Wailuku, Hawaii 96793
c/o lance.nakamura@co.maui.hi.us

IN REPLY REFER TO:
Project No.: 2020PR32125
Submission No.: 2020PR32125.002
through 2020PR32125.004
Log No.: 2020.00018
Doc. No.: 2108IK16
Archaeology

Dear Lance Nakamura:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
County of Maui Permit Application – G T2019/0219
Hökūāo 201-H Housing Project
Request Modification to Preservation Measure for SIHP #50-40-98-02000
Archaeological Monitoring Plan
Kamoku Ahupua‘a, Lāhainā District, Island of Lāna‘i
TMK: (2) 4-9-002:061 por., (2) 4-9-014:001 por., 009 por., and 011 por.**

This letter provides the State Historic Preservation Division’s (SHPD’s) review of the subject Hōkūāo 201-H Housing Project, the architectural documentation completed for the Lāna‘i City Power Plant (HAER HI-154), and a request to modify the preservation measures for the Dole Pineapple Harvester (SIHP #50-40-98-02000). In addition, this review includes a draft archaeological monitoring plan (AMP) titled, *Draft Archaeological Monitoring Plan for the Hōkūāo 201-H Housing Project, Kamoku Ahupua‘a, Lāhainā District, Island of Lāna‘i, TMK: [2] 4-9-002:061 por. and portions of TMKs: [2] 4-9-014:001. 009, and 011 (DiVito et al., July 2021).*

SHPD received the following submittal documents regarding the subject project (summarized in Table 1).

Table 1

| Submission Date | Submission No. | Log No. / Project No. | Submission Documents |
|-----------------|-----------------|----------------------------|---|
| 10/12/18 | NA | 2018.02441 | HABS for Kō‘ele Grammar School |
| | | 2018.02442 | HABS for Pālāwai School |
| 12/18/19 | NA | 2019.02740 | Mass Grading Permit |
| 2/01/19 | NA | 2019.00221 | AIS (Dye and Maly 2018) |
| 1/03/20 | NA | 2020.00018, 2020PR32125 | Pūlama Lāna‘i cover letter HRS 6E Submittal Form TMK map Permit set Archaeological field inspection End-of-Fieldwork report (Thrumman, December 2019) |
| 3/20/21 | 2020PR32125.002 | 2020PR32125 | Pūlama Lāna‘i letter requesting a modification to preservation measures for the Dole Pineapple Harvester and a draft AMP (DiVito et al., November 2020) |

| Submission Date | Submission No. | Log No. / Project No. | Submission Documents |
|-----------------|------------------|-----------------------|--|
| | | | NPS acceptance letter for HABS reports Pālāwai School (HABS HI-612), Kō'ele Grammar School (HABS HI-613), and Lāna'i City Power Plant (HAER HI-154) dated December 4, 2020. |
| | | | SHPD's letter dated August 14, 2020 (Log No. 2020.00018, Doc. No. 2008IK01) |
| | | | SHPD's acceptance letter for the Pālāwai School (HABS HI-612) and the Kō'ele Grammar School (HABS HI-613) per NPS standards (dated March 4, 2021, Log No. 2018.01708, Doc. No. 2103TGM16) |
| 4/12/21 | Uploaded by SHPD | 2020PR32125 | Revised SHPD acceptance letter for the two HABS reports (dated April 7, 2021, Project No. 2020PR32125, Submission No. 2020PR32125.002, Log No. 2018.01708, Project No. 2018PR27906, Doc. No. 2104IK01) |
| 7/24/21 | 2020PR32125.003 | 2020PR32125 | Honua Consulting cover letter Revised AMP (DiVito et al., July 2021) Revision comment matrix |
| 8/19/21 | 2020PR32125.004 | 2020PR32125 | Revised AMP (DiVito et al., August 2021) |

In a letter dated August 14, 2020 (Log No. 2020.00018, Doc. No. 2008IK01), SHPD reviewed the subject project and requested archaeological monitoring be conducted for identification purposes for all ground-disturbing activities during the proposed project. Additionally, SHPD indicated the architectural survey reports were not requested by SHPD for the two school structures (Pālāwai and Kō'ele Grammar School). Instead, the documentation was conducted at the request of the project proponent. The architectural survey reports were not reviewed and accepted by SHPD or the National Park Service (NPS). Therefore, SHPD requested that the architectural survey reports be completed per NPS standards and for SHPD's review and acceptance.

On March 20, 2021, SHPD received a letter from the NPS accepting the Historic American Buildings Survey (HABS) documentation for the Pālāwai School (HABS HI-612) and the Kō'ele Grammar School (HABS HI-613). In addition, the NPS accepted the Historic American Engineering Record (HAER) for the Lāna'i City Power Plant (HAER HI-154)(Submission No. 2020PR32125.002). In a revised SHPD letter dated April 7, 2021 (Project No. 2020PR32125, Submission No. 2020PR32125.002, Log No. 2018.01708, Project No. 2018PR27906, Doc. No. 2104IK01), SHPD accepted the HABS report for the Pālāwai and Kō'ele Grammar School. The HAER documentation for the Lāna'i City Power Plant (HAER HI-154) was not included in the letter.

Additionally, SHPD received a Honua Consulting, LLC (archaeological consultant) cover letter requesting to modify the Dole Pineapple Harvester's (SIHP #50-40-98-02000) preservation measure from preservation to no further work as the harvester was no longer salvageable. Accompanying the letter was a draft AMP (Submission No. 2020PR32125.002). Subsequently, SHPD requested minor revisions to the AMP and received the revised plan on July 24, 2021 (Submission No. 2020PR32125.003). SHPD asked for additional information regarding the Dole Pineapple Harvester consultations and received a revised AMP on August 19, 2021 (Submission No. 2020PR32125.004).

Scope of Work

Pūlama Lāna'i proposes the construction of 200 single-family homes, including 102 affordable houses 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 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 graded 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.

Archaeological Monitoring Plan

Honua Consulting prepared the AMP in support of the subject project. The AMP provides a historical background section, a summary of previous archaeological investigations conducted in the area, and archaeological monitoring provisions. This draft AMP (DiVito et al., August 2021) complies with the stipulations outlined in HAR §13-279-4 and provides the following provisions:

- On-site monitoring will be conducted for all ground-disturbing activities. One monitor is required for each piece of ground altering machinery during this project;
- A coordination meeting will be conducted between the construction team and the monitoring archaeologist prior to construction activities. A coordination meeting will be conducted between the construction team and the monitoring archaeologist prior to construction activities so that the team is aware of the need for archaeological monitoring, the archaeological provisions detailed in this plan, and the responsibility of the construction team to ensure that no ground-disturbing work is conducted without an archaeological monitor present;
- The archaeological monitor has the authority to temporarily halt all activity in the area in the event of a potential historic property being identified or to record archaeological information for cultural deposits or features;
- If non-burial historic properties are identified, documentation shall include, as appropriate, recording stratigraphy using USDA soil descriptions, GPS point collection, recordation of feature contents through excavation or sampling of features, screening of features, representative scaled profile drawings, photo documentation using a scale and north arrow, and appropriate laboratory analysis of collected samples and artifacts. Additionally, photographs and profiles of excavations will be collected from across the project area, even if no significant historic properties are encountered. The profiles will measure a minimum of 2 m across. Both vertical and horizontal scales will be recorded;
- If human remains are identified, work will cease in the vicinity, and the find shall be secured, and provisions outlined within the Hawaii Revised Statutes (HRS) §6E-43 and HAR §13-300-40, and any SHPD directives, shall be followed; and
- Collected materials not associated with burials will be temporarily stored at the archaeological firm's office/laboratory until an appropriate curation facility is selected, in consultation with the landowner and the SHPD.

Modification to the Dole Pineapple Harvester's (SIHP #50-40-98-02000) Preservation Measure

Additionally, the AMP provides an updated condition assessment for the Dole Pineapple Harvester (SIHP #50-40-98-02000). In SHPD's letter dated August 14, 2020 (Log No. 2020.00018, Doc. No. 2008IK01), SHPD agreed with the recommendation to move the harvester to a sheltered location prior to any ground disturbance activities and, if not possible, for the harvester to be protected by interim protection measures to ensure it is not impacted by the proposed project. In September 2020, Pūlama Lāna'i conducted a site inspection of the harvester to assess the structural integrity of the proposed relocation. It was determined that the harvester could not be moved without doing significant damage to the harvester. The harvester has degraded to the point that it is not salvageable and is a safety concern. The harvester was assessed to contain the same integrity and significance as previously determined. However, due to its irreparable condition, Pūlama Lāna'i plans to demolish the harvester prior to initiating any project-related ground disturbance activities.

SHPD consulted with Pūlama Lāna'i on July 29, 2021, via virtual conference call and requested additional information concerning consultation efforts regarding the updated condition assessment for the Dole Pineapple Harvester. SHPD received a revised AMP on August 19, 2021 (Submission No. 2020PR32125.004). The AMP indicates Kepa Maly (Lāna'i Cultural and Heritage Center [LCHC]), Albert Morita (former mechanic and LCHC Board Member), and Diane Preza (Director of Community Affairs [Pūlama Lāna'i and LCHC Board Member]) were consulted; they consulted on the original proposal to relocate and preserve the harvester. According to the AMP, the LCHC was unable to take on the entire restoration and the harvester has now deteriorated beyond restoration. Efforts were made to engage various organizations with the idea of setting up a location for display but were unsuccessful.

Determination

In a letter dated December 4, 2020, the NPS accepted the HAER documentation for the Lāna'i City Power Plant and assigned the number HAER HI-154 (Submission No. 2020PR32125.002). SHPD accepts the HAER documentation.

The Dole Pineapple Harvester (SIHP 50-40-98-02000) is significant under Criterion "a" due to its association with the seven decades of Lānaʻi's plantation economic pursuit. A recent site inspection of the harvester has indicated the harvester is a significant historic property but is too badly deteriorated to be salvaged and stabilized and is a safety concern. Based on the information above, **SHPD has no objections** to the request to modify the previous agreed upon preservation of the harvester for restoration and interpretive display to no further work and its demolition.

The plan meets the minimum requirements of HAR §13-279-4. **It is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a copy of this letter and a text-searchable PDF version of the AMP to the Kapolei SHPD office, attention SHPD Library. Also, submit a text-searchable PDF copy of the final AMP to HICRIS Project 2020PR32125 using the Project Supplement option and a PDF copy to lehua.k.soares@hawaii.gov.

Please make the following revisions to the final AMP:

1. According to SHPD's database, the Dole Pineapple Harvester's SIHP number is #50-40-98-02000 and not -02001. Revise the entire AMP with the correct SIHP number.

SHPD requests written notification at the start of archaeological monitoring. Within 30 days of completion of archaeological monitoring fieldwork, SHPD looks forward to receiving for review and acceptance a brief archaeological monitoring letter report of findings as specified in HAR §13-282-3(f)(1); and within 60 days, SHPD looks forward to receiving for review and acceptance an archaeological monitoring report (AMR) meeting the requirements of HAR §13-279-5.

Please submit the AMR and any other project-related documents and correspondence to our office via HICRIS to Project 2020PR32125 using the Project Supplement option.

SHPD hereby notifies the County of Maui that the archaeological monitoring plan and the final HABS reports are accepted, and the permit issuance process may continue.

Please contact Julia Flauaus, Architectural Historian, at Julia.Flauaus@hawaii.gov for matters 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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