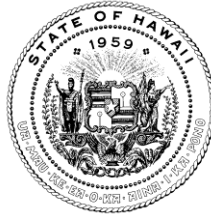


DAVID Y. IGE  
GOVERNOR OF HAWAII



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

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KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

October 15, 2021

Zendo Kern, Planning Director  
County of Hawai'i, Planning Department  
101 Pauahi Street, Suite 3  
Hilo, Hawai'i 96720  
[Planning@hawaiicounty.gov](mailto:Planning@hawaiicounty.gov)

IN REPLY REFER TO:  
Project No. 2020PR32834  
Submission No. 2020PR32834.005  
Doc. No. 2110NM05  
Archaeology

Dear Zendo Kern:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
County of Hawai'i Change of Zone Application, REZ 470, Ord. No. 02-131, RM-5 Zoned Land  
Kona Three, LLC Hōlualoa Property  
Archaeological Inventory Survey  
Hōlualoa Ahupua'a, North Kona District, Island of Hawai'i  
TMK: (3) 7-6-021:016-019**

This letter provides the State Historic Preservation Division's (SHPD's) review of a request to amend Rezone Ordinance No. 02-131 and the supporting draft report titled, *Archaeological Inventory Survey Report for 76.121 Acres Located in Hōlualoa 1st Ahupua'a, North Kona District, Hawai'i Island, Hawai'i [TMK: (3) 7-6-021:016-019]* (Escott and Escott, August 2021). Table 1 summarizes the submittals received for the subject project.

Date Received	Project No. or Submission No.	Materials Received
March 3, 2021	2020PR32834 (Previously Log No. 2020.00727)	Original Submittal with Draft AIS
May 7, 2021	2020PR32834.002	SIHP Request Form
May 12, 2021	2020PR32834.003	Revised AIS 1 and Response
July 28, 2021	2020PR32834.004	Revised AIS 2 and Response
October 11, 2021	2020PR32834.005	Revised AIS 3 and Response

Scientific Consultant Services, Inc. (SCS) completed the AIS of approximately 76.121 acres at the request of the applicant, Kona Three, LLC and Richard Wheelock (owner), and in response to a SHPD letter dated July 30, 2020 (Log No. 2018.00878, Doc. No. 1807SN01). The landowner plans to apply for a County of Hawai'i grubbing and grading permit in support of proposed development of the property.

Pertinent SHPD Correspondence:

2018a In a letter dated May 31, 2018 (Log No. 2018.01123, Doc. No. 1805SN05), SHPD accepted the AIS completed for a 5.0-acre portion of the overall project area and agreed to mitigation commitments in the form of an archaeological preservation plan (PP) for Site # 50-10-37-30592, a burial treatment plan (BTP) for Site # 50-10-37-30593, and an archaeological monitoring plan (AMP) for the proposed development.

2018b In a letter dated July 30, 2018 (Log No. 2018.00878, Doc. No. 1807SN01), SHPD reviewed and had no objection to a request to amend Rezone Ordinance No. 02-131. Additionally, SHPD stipulated the following needed to be completed prior to issuance of any permits:

- Burial Treatment Plan for Site # 50-10-37-30593;
- Preservation Plan for Site # 50-10-37-30592;

3. Archaeological Monitoring Plan for the portion of the 5-acre AIS project area in proximity to Sites # 50-10-37-30592 and # 50-10-37-30593;
4. Verification of installation of interim protection measures around Sites # 50-10-37-30592 and # 50-10-37-30593; and
5. Completion of an AIS for the 63.8-acre portion of the project area within the boundaries of the Hammatt et al. (1992) survey. Our records indicate that the Hammatt et al. (1992) survey report was never revised and accepted and does not meet current HAR §13-276-5 standards for archaeological inventory surveys. The AIS for the 63.8-acre portion needs to include a 100% pedestrian survey, identification and updated documentation of all archaeological historic properties present, an assessment of their integrity and site significance pursuant to HAR §13-284-6, Criteria a-e, as well as site plans for each site, including site boundaries and areas impacted by bulldozing, and photographs of all sites and features. Lastly, SHPD requested the selected archaeological firm consult with SHPD prior to initiation of the AIS regarding proposed documentation strategy.

2020a In a letter dated October 30, 2020 (Log No. 2020.01241, Doc. No. 2010NM09), SHPD reviewed the plan titled, *An Archaeological Preservation Plan for Site # 50-10-57-30592 Located in Hōlualoa I<sup>a</sup> Ahupua`a, North Kona District, Island of Hawai`i [TMK: (3) 7-6-021:016-019]* (Escott and Mello, May 2020). SHPD stipulated the following needed to be completed prior to submittal and acceptance of a revised PP:

1. SHPD acceptance of the draft Escott and Escott (2020) AIS for the 63.8-acre portion of the project area and incorporation of any agreed-upon preservation sites or portions of sites into the revised PP. Note for example that Site #50-10-37-030592 occurs in both the 63.8-acre and 5.0-acre portions of the overall project area;
2. Insertion into the PP of text and permit plans detailing the location and extent of the proposed breach of Site # 50-10-37-30592;
3. A permit application for the breach work and a SHPD HRS 6E Submittal Form for the project; and
4. Address the revisions specified in the Attachment.

2020b In a letter dated November 19, 2020 (Log No. 2020.00727, Doc. No 2011NM04), SHPD requested revisions to the Escott and Escott (March 2020) AIS report.

Previous archaeological studies within the project area consist of a reconnaissance survey (Hammatt and Folk 1983) and two AIS (Hammatt et al. 1984; Hammatt et al. 1992) conducted in TMK: (3) 7-6-021:016 and 017, and a field inspection of the current project area (Escott 2016). SHPD did not accept the Hammatt et al. (1984) AIS as it did not meet the standards (August 25, 1992, Log No. 6174, Doc. No. 3524c; and October 5, 1992, Log No. 6482, Doc. No. 3542c). The AIS identified 21 archaeological sites inside the current project area: Sites 50-10-37-10011, 50-10-37-10012, 50-10-37-10013, 50-10-37-10015, 50-10-37-10017, 50-10-37-10018, 50-10-37-10019, 50-10-37-10020, 50-10-37-10031, 50-10-37-10033, 50-10-37-10034, 50-10-37-10049, 50-10-37-10067, 50-10-37-10068, 50-10-37-10069, 50-10-37-10070, 50-10-37-10071, 50-10-37-10072, 50-10-37-10073, 50-10-37-10074, and 50-10-37-1007 and two bulldozed modern planting terraces. The total project area was 174 acres of which 66.039 acres are within the current overall project area. Site 10012 consisted of two burials that were reinterred outside the project area. Excavated sites in the current project area included Sites 10011, 10012, 10013, 10019, 10067, 10068, 10069, 10070, 10072, 10073, and 10074.

No correspondence associated with the Hammatt et al. (1992) project was located during preparation of this review. As such, it is unknown at this time whether Hammatt et al. (1992) assessed the archaeological sites for significance, and whether recommendations were made regarding which sites were adequately documented, requiring no further work, and which retained potential for further documentation through mitigation including archaeological monitoring or preservation. Hammatt and Shideler (2007) submitted additional site documentation in the form of a letter to SHPD for Sites 10011, 10012, 10031, 10049 and 10071. Site maps and photographs were not provided for all sites.

SCS conducted an archaeological field inspection (Escott 2016) of the current project area to relocate the sites identified during the Hammatt et al. (1992) AIS, to assess their current condition and the adequacy of the Hammatt

et al. documentation. The field inspection did not include completing new documentation in the form of drawing site maps or taking photographs of sites where such documentation was not recorded by Hammatt et al. (1992), although such documentation is required to meet the minimum AIS standards as defined in HAR §13-276.

The current AIS (Escott and Escott, August 2021) indicates that the project area was bulldozed for commercial agriculture in the 1950s. Consultation occurred with Gregg Kashiwa who was the property manager for parcels 016 and 017 in the 1980s. Kashiwa indicated the project area was already bulldozed at that time but was familiar with the historic features on the property. SCS also contacted Shane Nelson, an Office of Hawaiian Affairs (OHA) representative, but received no response.

The fieldwork component of the Escott and Escott (August 2021) AIS was conducted throughout 2020. The project included a 100% surface survey with site recordation, GPS, photography, and subsurface excavation with documentation. A total of 16 sites and one isolated find (IF-1) were identified during the AIS (Table 1). Two sites and a petroglyph (Site 50-10-37-31181, Site 50-10-37-31182, and 50-10-37-31254) were newly identified and the remaining fourteen sites were previously documented (Hammatt et al. 1992). Five previously identified sites were determined no longer present (Site 50-10-37-10012, Site 50-10-37-10017, Site 50-10-37-10033, Site 50-10-37-10049, and Site 50-10-37-10071). Site 50-10-37-10015 was determined to be a modern bulldozer road segment and therefore it is not an archaeological site. The Site 50-10-37-10012 burial (MNI =2), along with the entirety of the burial crypt and all associated features, were disinterred during the Hammatt et al. (1992) project and reinterred outside the project area in 1993. The reinterment was conducted in consultation with the Hawai'i Island Burial Council and Marc Smith from SHPD. A letter dated February 8, 1993, from Gregg Kashiwa (Cultural Surveys Hawai'i, Inc.) to SHPD, provides additional details regarding the burial site. Site 50-10-37-10020 and Site 50-10-37-10034 were determined to be natural geological features. The sites include pre-Contact to post-Contact enclosures, platforms, mounds, lava tubes, walls, a railroad berm, and complexes. Two sites (Site 50-10-37-10011 and Site 50-10-37-10073) were excavated during the current AIS.

*Table 1. Archaeological sites documented during the current AIS.*

<b>SIHP # (50-10-28)</b>	<b>Site Description</b>	<b>Function</b>	<b>Temporal Association</b>	<b>Significance</b>	<b>Mitigation</b>
-10011	Platform	Agricultural Clearing	Pre-Contact	d	NFW
-10012	Former Burial Platform	Burial	Pre-Contact	No longer significant	NFW
-10013	Enclosure and Lava Tube	Habitation	Pre-Contact	d	NFW
-10018	Enclosure Remnant	Agriculture	Historic	d	NFW
-10019	Rock Mounds	Agricultural Clearing	Historic	d	NFW
-10031	Enclosure Wall	Agriculture	Historic	d	NFW
-10067	Terraces	Habitation	Pre-Contact	d	NFW
-10068	Enclosure	Habitation	Pre-Contact	d	NFW
-10069	Modified Bluff/Platform	Habitation	Historic	d	NFW
-10070	U-shaped Enclosure	Agriculture	Historic	d	NFW
-10072	Complex	Agricultural Clearing	Pre-Contact	d	NFW
-10073	Complex	Ranching/Agriculture	Historic	d	NFW
-10074	Enclosure	Coffee Work Shed	Historic	d	NFW
-10075	Enclosure	Pig Pen	Historic	d	NFW
-30592	Railroad Berm	Transportation	Historic	a, c, d	P
-31181	Enclosure	Coffee Work Shed	Historic	d	NFW
-31182	Rock Walls	Ranching and Agriculture	Historic	d	NFW
-31254	Petroglyph	Marker	Pre-Contact	d, e	P

\*No Further Work (NFW), Preservation (P)

The 18 sites were assessed as significant under HAR §13-284-6 Criterion d. Site 50-10-37-30592, the railroad berm, was also assessed as significant under Criteria a and c and was recommended for preservation. Site 50-10-37-31254, a petroglyph, was also assessed as significant under Criterion e and was recommended for preservation. Site 50-10-37-10012 is a former burial site where the disposition (burial and associated burial crypt and features) were relocated. Thus, there are no known human skeletal remains left. Nevertheless, it is recommended that this former

burial site be flagged for preservation in the form of avoidance. The previous site location will be monitored if construction activities occur near that location. The report recommends no further historic preservation work for the remaining sites.

SHPD agrees with the site integrity and significance assessments for all 18 sites. SHPD's project effect determination is "Effect, with agreed upon mitigation commitments" and SHPD agrees that the 16 sites recommended for no further work have been adequately documented. SHPD agrees with the preservation of Sites 50-10-37-30592 and 50-10-37-31254 and additional mitigation in the form of archaeological monitoring during initial ground disturbance for the entire project area.

The Escott and Escott (August 2021) AIS report addresses the concerns raised in our earlier correspondence and satisfies the requirements of HAR §13-276-5. **It is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a text-searchable PDF copy of the document and a copy of this acceptance letter to the Kapolei SHPD office, attention SHPD Library. Additionally, please upload a text-searchable PDF version of the document to HICRIS Project No. 2020PR32834 using the Project Supplement option and send a text-searchable PDF copy of the AIS report to [lehua.k.soares@hawaii.gov](mailto:lehua.k.soares@hawaii.gov).

**SHPD requests** the following be submitted for SHPD review and acceptance prior to permit issuance:

1. An archaeological monitoring plan (AMP) for all initial ground disturbing activities that meets the requirements of HAR §13-279-4;
2. An archaeological preservation plan (PP) for Site 50-10-37-30592 and Site 50-10-37-31254 that meets the requirements of HAR §13-277; and
3. Written and photographic documentation verifying implementation of interim protection measures for Sites 50-10-37-30592 and 50-10-37-31254.

Please submit the plans and the interim protection documentation, along with the required review fees for the AMP and PP to HICRIS Project No. 2020PR32834 using the Project Supplement option.

**SHPD shall notify the County** when the mitigation plans are accepted, and the permit issuance process may proceed.

Please contact Nicole A. Mello, Historic Preservation Archaeologist IV, at [Nicole.Mello@hawaii.gov](mailto:Nicole.Mello@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

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