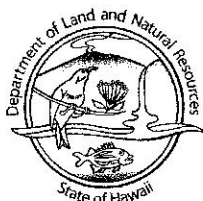


LINDA LINGLE  
GOVERNOR OF HAWAII



PETER T. YOUNG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
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**STATE OF HAWAII**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**

HISTORIC PRESERVATION DIVISION  
KAKUHIHEWA BUILDING, ROOM 555  
601 KAMOKILA BOULEVARD  
KAPOLEI, HAWAII 96707

October 24, 2005

Thomas Wolforth  
Scientific Consultant Services Inc.  
711 Kapiolani Blvd., Suite 975  
Honolulu, HI 96813

LOG NO: 2005.2296  
Doc. No. 0510nm42

Dear Mr. Wolforth:

**SUBJECT: Chapter 6E-42 Historic Preservation Review – Revised  
“Archaeological Inventory Survey of the North Portion of the Kaloko  
Heights Project in Kohanaiki and Kaloko” Settlement Patterns  
Investigations in the Southern Kekaha Middle Elevations” (Wolforth  
et. al. 2005)  
Kaloko and Kohanaiki Ahupuaa, North Kona, Hawaii Island  
TMK: 3-7-3-009: 32**

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Thank you for submitting the above cited revised inventory survey report which we received on October 13, 2005. We believe this report adequately addresses the majority of our comments communicated in my July 13, 2005 correspondence to you regarding our initial review of this survey report. We appreciate your response to each of our previous review notes as this facilitated our current review of the report. We note that in some cases your response to our comments indicated that the report would be revised to address our concerns; however, this did not occur in all cases. Nevertheless, we will accept this report as final with the condition that these discrepancies be corrected and replacement pages submitted to this office within 30 days for inclusion in the final report.

As indicated by this survey report a total of 89 archaeological sites have been identified in the project area. These sites include water sources, permanent and temporary habitation sites, petroglyphs, papamus, religious and ceremonial places, trails, a historic road and agricultural sites. The project area dates from A.D. 1300 and was in heavy use in the 17<sup>th</sup> century. Your research shows that the upland areas were inhabited as heavily as the coastal areas.

Mr. T. Wolforth  
October 24, 2005  
Page 2 of 3

All 89 historic sites are significant under criteria D, with seven of these sites (10691, 10692, 10695, 10709, 10718, 10725, and 10746) also deemed significant under criteria C. Moreover, fourteen sites (10701, 10702, 10714, 10717, 10722, 10728, 10736, 10740, 10741, 10745, 10749, 10784, 10764, and 10778) are considered significant under criteria E. We appreciate your reconsideration of the significance of site 10714, *Road to the Sea*, and agree with your current assessment that it is significant under criteria D and E.

We agree with your recommendation of data recovery for 26 sites which include agricultural sites, permanent and temporary habitation sites, and water sources (10693, 10694, 10700, 10705, 10706, 10721, 10729, 10730, 10732, 10734, 10735, 10737, 10742, 10743, 10751, 10753, 10755, 10756, 10757, 10758, 10763, 10764, 10767, 10768, and 10778). The research that will result from your data recovery efforts will focus on site population. We look forward to receiving a data recovery plan for our review.

We also concur with your recommendation that 11 historic sites (10741, 10745, 10749, 10692, 10718, 10725, 10746, 10691, 10695, 10709, and 10702), seven burial sites (10701, 10717, 10722, 10728, 10740, and 10754) and one heiau with a burial (10736) be preserved. A preservation plan that includes a burial treatment component will need to be submitted for these sites. Once the burial treatment plan is received by our office we will forward it to the members of the Hawaii Island Burial Council for their review and determination as to whether the burials identified through this survey are to be preserved in-place or relocated.

Finally, we accept your recommendation of "no further work" for the remaining 45 sites, including site 10714. We appreciate the effort of your staff in their research and consultation with persons knowledgeable about the significance of the *Road to the Sea*. Your research confirms that this historic trail was used by area residents to traverse from their homesteads to the sea, and later adopted for use by soldiers during WW II. Although many of the native Hawaiians you consulted with expressed their wish that this road be preserved, we agree that this is not feasible as the road has lost its integrity. In addition to the modifications made by WWII soldiers, the *makai* section of this road has been breached with many sections of it either destroyed or nearly destroyed. It is my understanding that the developer is considering the realignment of this road so that it can be used as a trail to a park site. I have been informed that this trail would include signage that would educate the public of the historic use of the *Road to the Sea*. We believe this positive approach to preservation will help to connect the public to the history of this important area.

Mr. T. Wolforth  
October 24, 2005  
Page 3 of 3

As indicated above, we can now accept this report as final provided the following points that were summarized in your memo addressing our review points are incorporated into the report. Please submit replacement pages for the following within 30 days:

1. Page 22 should be amended to indicate that SCS surveyed "The Walled Fields," and confirmed the earlier descriptions presented by Barrera. (Point 5)
2. Although figure 3 was amended, it is still difficult to differentiate between the Kona Field System and Walled Fields on the map. Please revise the map legend to allow the reader to quickly and clearly distinguish these areas as presented in the project area map. (Point 6)
3. Page 173 includes a discussion on the papumu which indicates it is affiliated with the *Road to the Sea*; however, it does not include a discussion of its significance to the road or its age. (Point 15)
4. Site 10716 appears to be missing from the project area map (Figure 3). (Point 16)

Finally, we recommend that all ground disturbing work associated with the development of this project include an on-site qualified archaeological monitor who has the authority to halt work should historical sites, including burial be inadvertently discovered. In the event a burial is discovered, all work in the immediate area must cease and the State Historic Preservation Division, county police, and medical examiner must be informed of the discovery. We are recommending on-going monitoring during ground disturbing work given the array and number of historic sites already attributed to this property and to nearby development projects. We look forward to receiving a monitoring plan for this project.

If you have any questions about this review please contact me at 692-8040.

Sincerely,

  
MELANIE A. CHINEN, Administrator  
State Historic Preservation Division

c: Hawaii Island Burial Council  
County of Hawaii, Planning Department  
Mr. Bob Spears, SCS  
Mr. Stanford Carr  
Mr. Paul Kay

LINDA LINGLE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
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PETER J. YOUNG  
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ROBERT K. MASUDA  
DEPUTY DIRECTOR, LAND

DEAN SAKANO  
DEPUTY DIRECTOR, HISTORIC

DEAN SAKANO  
DEPUTY DIRECTOR, HISTORIC  
PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707  
TEL: 808/451-2300  
FAX: 808/451-2300

June 15, 2006

Thomas R. Wolforth  
Scientific Consultant Services, Inc.  
1564 Leilehua Street  
Hilo, Hawaii'i 96720

LOG NO: 2006.2022  
DOC NO: 0606CM17  
Archaeology

Dear Mr. Wolforth:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Revised Data Recovery Plan for Kaloko Heights, Including Interim Protection and  
Monitoring Plan (SCS Report 541-Data Recovery-2)  
Kaloko and Kohanaiki Ahupua'a, North Kona District, Island of Hawaii'i  
TMK: (3) 7-3-009:032**

Thank you for submitting the aforementioned revised report by Wolforth (2006). In a letter (LOG NO: 2006.0752, DOC NO: 0602MM02) dated March 20, 2006, we requested several revisions to the data recovery plan, which you have now made to our satisfaction. This letter reviews our earlier comments and summarizes how you have addressed each of these. Thank you for working with our office to make these changes. The sites covered under this plan were previously identified and documented in an archaeological inventory survey that was approved by our division on October 24, 2005 (LOG NO: 2005.2296, DOC NO: 0510NM42).

The plan addresses data recovery research questions and proposed methodologies for investigations at twenty-six (26) archaeological sites. Pre-Contact archaeological research questions will focus on walled agricultural fields with what are believed to be associated habitation sites, permanent habitation sites, and caves. For the walled agricultural fields, used between the early 1400s and late 1600s, you propose to study how the pre-Contact residential units are arranged within the agricultural landscape. For seven (7) permanent habitation sites comprised of both surface features alone or in association with caves, your work will focus on the use and function of the spaces immediately surrounding the site's surface architecture, and the activities within the caves. In addition, eight (8) other caves will be subject to data recovery investigations, those with water collection features (stone rings and decayed organic material from water vessels) and those interpreted as temporary habitation sites. Your research will focus on establishing a chronology of these uses, and for the water collection caves, determining whether there is evidence that they served the needs of high status individuals.

Field methods have been proposed to accommodate the research goals in the homestead sites, walled agricultural fields, pre-Contact habitation sites, caves and along trails. Excavations will consist of a combination of shovel probes within grid areas and controlled excavations for a proposed total of 136.5 square meters. Photo documentation and detailed mapping of petroglyphs on stepping stones in the trail

Mr. Wolforth  
Page 2

contexts will be conducted prior to their removal and relocation to a preservation area within the project area. Data recovery in the caves will consist of collection of charred wood and *kukui*, photo documentation of selected architectural features, and collection of any macro-botanical material. For petroglyphs in one of the caves, Site 10743, detailed recording and subsequent removal is proposed and relocation to a preservation area within the project area.

In your cover letter, you describe how our specific concerns have been addressed in this revised report, as follows:

SHPD letter ...reiterates and synthesizes the plan's contents. The letter ended noting that the plan "generally fulfills the requirements of §13-278, HAR, and is conditionally approved provided the changes indicated by this letter are made." The only concern with the plan that was expressed in the letter was regarding how petroglyphs would be removed from one site: "the specific method of removal and transport should be identified in this plan so you have some basis to evaluate its effectiveness in your data recovery report". Subsequent to the dispatch of this letter, SHPD has made two additional requests via phone for changes to the plan: (1) Do something more with the water collection caves. (2) Provide interim protection measures for the data recovery sites. In addition, a Monitoring Plan has been required by SHPD (see SHPD letter LOG NO: 2005.2296, DOC NO: 0510mm42). The Monitoring Plan for Kaloko Heights is included in this revised Data Recovery Plan. The title for this revised Plan has been changed to reflect this addition.


We have reviewed the changes, which you have made to our satisfaction. The plan is accepted as fulfilling the requirements of Hawai'i Administrative Rules (HAR) 13-13-278.

SHPD staff Dr. Chris Monahan consulted with Mr. Tom Wolforth regarding the appropriateness of including the monitoring plan within the data recovery plan. We agreed that monitoring will be considered part of the data recovery process, and the results of monitoring will be included in the final data recovery report.

Please submit one (1) final, bound, hardcopy of the plan to our O'ahu office, and one (1) final, bound hardcopy to our Hawai'i (Kona) office, to replace the unbound revised report you submitted for this current review.

Please contact Dr. Chris Monahan at (808) 692-8015 if you have any questions about this letter.

Aloha,

  
Melanie Chinen, Administrator  
State Historic Preservation Division

CM

LINDA LINGLE  
COMPTROLLER GENERAL



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
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KAPOLEI, HAWAII 96707

PETER J. YOUNG  
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ROBERT K. MASUDA  
DEPUTY DIRECTOR

DEAN SAKANO  
MANAGING DIRECTOR

NOTARY PUBLIC  
IN THE STATE OF HAWAII  
COMMISSIONER OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707  
LAND AND NATURAL RESOURCES  
STATE OF HAWAII

June 15, 2006

Mr. Thomas Wolforth, M.S.  
Scientific Consultant Services, Inc.  
711 Kapiolani Boulevard, Suite 975  
Honolulu, Hawai'i 96813

LOG NO: 2006.2021  
DOC NO: 0606CM16  
Archaeology

Dear Mr. Wolforth:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Revised Preservation Plan for Kaloko Heights (SCS Report 541-Preservation-3)  
Kaloko and Kohanaiki Ahupua'a, North Kona District, Island of Hawai'i  
TMK: (3) 7-3-009:032**

Thank you for submitting the aforementioned revised report by Wolforth (2006). In a letter (LOG NO: 2006.0752, DOC NO: 0602MM03) dated March 16, 2006, we requested several revisions to the preservation plan, which you have now made to our satisfaction. This letter reviews our earlier comments and summarizes how you have addressed each of these. Thank you for working with our office to make these changes, which shall provide protection for these important cultural sites. The sites covered under this plan were previously identified and documented in an archaeological inventory survey that was approved by our division on October 24, 2005 (LOG NO: 2005.2296, DOC NO: 0510NM42).

The plan proposes short-term and long-term preservation measures for the following twelve (12) archaeological sites: two (2) permanent habitation complexes (Sites 10691 and 10695), four (4) caves related to water collection (Sites 10692, 10718, 10725, 10746), three (3) historic homesteads (Sites 10741, 10745, 10749), one (1) boundary wall (Site 10709), and two (2) *heiau* (Sites 10702 and 10736). Proposed forms of preservation are protection, stabilization, establishment of appropriate native vegetation, and site development (interpretation). Sites are proposed to be protected and avoided through interim and long-term permanent buffers. Restoration of preservation sites excavated during the inventory will precede removal of alien vegetation and planting native vegetation. Final steps will be placement of walkways, benches, and signs; and, construction of metal railings around the cave openings.

In your cover letter, you describe how our specific concerns have been addressed in this revised report, as follows:

There were five numbered directions and suggestions for alterations to the Preservation Plan...Each was addressed, and a revised plan was submitted to SHPD on May 10, 2006. SHPD staff Julie Taomia and David Brown phoned Thomas Wolforth to explain that SHPD did not concur with the submitted revisions for points Number 4 and 5. Specifically, SHPD emphasized that nothing could be leaned on or put on the walls in question. These conversations

Mr. Wolforth  
Page 2

emphasized that the plan needed to revert to the original language for the wall at Site 10709. That was done. In addition, there is now a 20 foot interim buffer to protect the wall during construction. Likewise for the issue of the western wall at the Homestead preservation area.

We have reviewed the changes, which you have made to our satisfaction. The plan is accepted as fulfilling the requirements of Hawai'i Administrative Rules (HAR) 13-13-277.

Please submit one (1) final, bound, hardcopy of the plan to our O'ahu office, and one (1) final, bound hardcopy to our Hawai'i (Kona) office, to replace the unbound revised report you submitted for this current review.

Please contact Dr. Chris Monahan at (808) 692-S015 if you have any questions about this letter.

Aloha,

  
Melanie Chinen, Administrator  
State Historic Preservation Division

CM

LINDA LINGLE  
GOVERNOR OF HAWAII



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

STATE HISTORIC PRESERVATION DIVISION  
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PETER T. YOUNG  
CHAIRPERSON  
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ROBERT K. MASUDA  
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KABOOLAWI ISLAND RESERVE COMMISSION  
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November 6, 2006

Paul Kay  
Kaloko Heights Associates, LLC  
73-4577 Hina Lani Street  
Kailua-Kona, HI 96740

LOG NO: 2006.3686  
DOC NO: 0611KL09

Dear Mr. Kay:

**SUBJECT: Final Preservation Plan Approval**  
**SIHP Sites 10701, 10717, 10722, 10728, 10736, 10740 and 10754**  
**"Kaloko Heights" Project**  
**Kohanaiki and Kaloko Ahupua'a, North Kona District, Hawai'i Island**  
**TMK (3) 7-3-009:032**

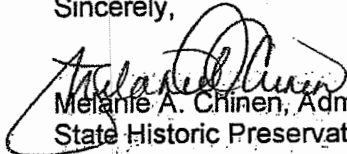
The Department of Land and Natural Resources (DLNR)- State Historic Preservation Division is in receipt of a revised final preservation plan (plan) for the above mentioned Native Hawaiian burial sites which are situated on the subject tax map key parcel.

The revised plan was submitted on your behalf by Mr. Thomas Wolforth of Scientific Consultant Services, Inc. The plan was revised to address SHPD directives and concerns detailed in our September 18, 2006 letter to you (Chinen to Kay, Log No: 2006.3164, Doc No: 0609KL05).

Our review of the revised plan has confirmed that our directives and concerns have been addressed and the SHPD hereby provides final approval for the revised plan. We look forward to seeing the details of the plan fully implemented, which will provide perpetual protection for the subject Native Hawaiian burial sites.

Thank you for your cooperation and patience throughout this process. Should you have any questions, please contact Keola Lindsey of our History and Culture Branch at 327-3692.

Sincerely,

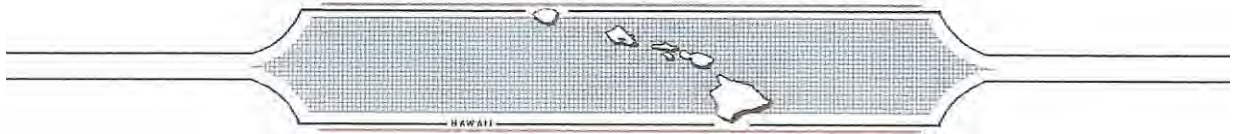
  
Melanie A. Chinen, Administrator  
State Historic Preservation Division

KL:jen

c: Members, Hawai'i Island Burial Council  
Ms. Ruby P. McDonald, Cultural Descendant  
Ms. Iwalani Arakaki, Cultural Descendant



SCIENTIFIC CONSULTANT SERVICES Inc.



Hawai'i Island Office: PO Box 155 Kea'au, HI 96749

April 9, 2018

Susan Lebo, PhD  
Archaeology Branch Chief  
State Historic Preservation Division  
Department of Land and Natural Resources  
Kapolei, HI 96720

**RE: Confirmation of Interim Construction Buffers Installation at Sites 50-10-28-10714, 10722, 10736, 10740, 10741, 10745, 10749, and 10754 Located at the Kaloko Heights Project Area in Kohanaiki and Kaloko Ahupua'a, North Kona District, Hawai'i Island, Hawai'i [TMK: (3) 7-3-009: 058 (por.), 059 (por.), 060, 061 (por.) and 062 (por.)].**

Dear Dr. Lebo:

This letter is to confirm that Scientific Consultant Services, Inc. (SCS) has inspected completed interim construction buffer fencing at Sites 50-10-28-10714, 10722, 10736, 10740, 10741, 10745, 10749, 10754 located on the above referenced TMK parcels [Enclosures 1 through 3]. The installation and inspection of buffer fencing were completed in conjunction with a County of Hawai'i Planning Department grubbing and grading permit application. The property owner is RCFC Kaloko Heights, LLC. The property owner contact person is Mr. Mark Meyer. Mr. Meyer's email is [mmeyer@hh1898.com](mailto:mmeyer@hh1898.com) and he can be reached by phone at (650) 208-3537.

The archaeological preservation sites boundaries were surveyed in the field by Sam O. Hirota, Inc., civil engineering and licensed surveyor, assisted by SCS archaeologists Glenn G. Escott, M.A., Suzan Escott, B.A., and Nicole Mello, M.A. The same surveyors, assisted by SCS archaeologists, flagged the locations where interim construction fencing would be installed. During the last two weeks of March, 2018, SCS archaeologists assisted a fence crew installing orange construction fencing at the archaeological preservation sites.

Orange construction fencing was installed at the distances established in the Department of Land and Natural Resources State Historic Preservation Division (SHPD) approved archaeological preservation plan (PP, Wolforth 2006c) and burial treatment plan (BTP, Wolforth 2006a).

Site 10714 is a Historic era to early Modern era *mauka-makai* trail/road, also known locally as the Road from Kaloko Pond to Kohanaiki Homesteads, Kohanaiki Trail and the Road to the Sea (RTS), situated outside of and along the north side of the proposed grubbing and grading project area. The RTS extends from the east to the west boundaries of the project area and continues west off the property. The trail was not recommended for preservation in the archaeological inventory survey report (Wolforth et al. 2005:310). The trail/road is considered a public way.

The previous property owner, in consultation with neighbors and area residents, agreed to preserve the RTS. Preservation commitments are documented in a letter from the previous property owner to the County of Hawai'i Planning Director [Enclosure 4]. The document states there shall be a ten foot open space boundary on either side of the ten foot wide trail/road corridor (p. 1, #2).

Orange construction fencing was installed along the entire south side of the RTS, where it abuts the north side of the proposed grubbing and grading project area, and extends at least 150 feet off the west edge of the project area [portions of TMK:(3) 7-3-008:061 & (3) 7-3-009: 059 and 062]. The construction fencing was installed at a distance of 15 feet from the outside edge of the RTS corridor. The RTS is outside of the proposed grubbing and grading project area and no construction will be conducted north of the orange construction fence installed at the RTS.

Site 10722 is a short lava tube and burial located along the east side of the proposed grubbing and grading project area (Wolforth et al. 2005:190-192). The northeast end of the tube is not within the project area and is on neighboring property not owned by RCFC Kaloko Heights, LLC. Preservation measures established for Site 10722, including interim construction fencing, are documented in the BTP (Wolforth 2006b:25).

Orange construction fence was installed around the north, west and south sides of Site 10722 at a distance of 50 feet from the outside perimeter of the lava tube. The east side of Site 10722 is outside of the grubbing and grading project area and is on private property belonging to owners not associated with the project property owners. No construction will be conducted on the privately owned parcels to the west.

Site 10736 is a rectangular enclosure and associated features (Wolforth et al. 2005:220-226) located in the northwest corner of the proposed grubbing and grading project area. Isolated human skeletal elements were identified at the site. Site 10736 was interpreted as a *heiau* and burial.

Preservation measures established for Site 10736, including interim construction fencing, are documented in the PP (Wolforth 2006c:22-23) and BTP (Wolforth 2006b:25). Orange construction fence was installed at a distance of 50 feet from the outside perimeter of Site 10736, surrounding the entire site.

Sites 10741, 10745, 10749, and 10754 are within the Kohanaiki Homestead lots located just outside of the northeast corner of the proposed grubbing and grading project area. The sites will be preserved in a large preservation area. The sites include Historic era homestead habitation and planting features and a lava tube burial. The sites were recommended for preservation in the archaeological inventory survey report (Wolforth et al. 2005:310).

Preservation measures established for Sites 10741, 10745, 10749 and 10754, including interim construction fencing, are documented in the PP (Wolforth 2006c:26-29) ) and BTP (Wolforth 2006b:25). Orange construction fence was installed at a distance of 20 feet from the outside perimeter of the west wall of the Kohanaiki Homesteads preservation area. The orange construction fence connects to the construction fence installed along the south side of Site 10714 (RTS). No grubbing or grading will be conducted east of the construction fence at the homestead preservation area or north of the construction fence along the RTS.

Site 10740 is a short lava tube with isolated skeletal elements located to the north and outside of the northeast corner of the proposed grubbing and grading project area. The orange construction fencing installed along the RTS and along the southwest side of the homestead lots preservation area will prevent construction in the vicinity of Site 10740.

I can confirm that the orange construction fencing is installed at all archaeological preservation and burial sites. Photographs of the completed interim construction fence are provided in Enclosures 5 through 16. The interim preservation measures follow the SHPD-approved PP and BTP and are appropriate and adequate to protect the archaeological preservation and burial sites during proposed grubbing and grading at the project area.

The project area archaeological inventory survey report (Wolforth et al. 2005), burial treatment plan (Wolforth 2006a), archaeological preservation plan (Wolforth 2006c) and archaeological monitoring plan (Wolforth 2006b) have all been approved by SHPD. The data recovery report (Wolforth et al. 2009) was submitted for SHPD review April 24, 2009. SHPD is still reviewing the draft report. Table 1 lists the SCS studies conducted for the current project area.

**Table 1:** Inventory of SCS Archaeological Reports and Plans for Project Area.

REPORT/PLAN	REFERENCE	SHPD APPROVAL LETTER
Archaeological Inventory Survey & Data Recovery	Barrera 1991	1991
Archaeological Inventory Survey	Wolforth et al. 2005	LOG NO: 2005. 2296 DOC. NO: 0510NM42
Burial Treatment Plan	Wolforth 2006a	DOC NO.: 0611KL09
Archaeological Preservation Plan	Wolforth 2006c	LOG NO.: 2006.2021 DOC NO.: 0606CM16
Archaeological Monitoring Plan	Wolforth 2006b	LOG NO.: 2006.2022 DOC NO.: 0606CM17
Data Recovery	Wolforth et al. 2009	Submitted April 24, 2009, SHPD Reviewing

Susan Lebo, SHPD  
April 9, 2018  
Kaloko Hts  
Page 5/6

The requisite archaeological reports and plans have been submitted, reviewed and approved by SHPD. The orange construction fencing has been installed at the project area archaeological preservation and burial sites. The property owner will retain the services of a qualified archaeologist, in accordance with the archaeological monitoring plan (Wolforth 2006b).

Sincerely,



Glenn G. Escott, MA  
Senior Archaeologist  
Scientific Consultant Services, Inc.  
PO Box 155 Kea'au, HI 96749  
808-938-0968  
ggescott@yahoo.com

Enclosure 1: Hawai'i Island Map of Project area.

Enclosure 2: USGS Map of Project area, Sites and Interim Construction Fencing.

Enclosure 3: Plat Map of Project area, Sites and Interim Construction Fencing.

Enclosure 4: Site 10714 Preservation Commitments Letter.

Enclosures 5 through 16: Photographs of Interim Construction Fencing.

## REFERENCES CITED

Wolforth, T.

2006a *Burial Treatment Plan for Kaloko Heights, Kohanaiki and Kaloko Ahupua 'a, TMK: 3-7-3-009:32.* SCS Report 541-BTP prepared for Kaloko Heights Associates, Honolulu, Hawai'i.

2006b *Data Recovery Plan for Kaloko Heights, Including Interim Protection and Monitoring Plan, Kohanaiki and Kaloko Ahupua 'a, TMK: 3-7-3-009:32.* SCS Report 541 Data Recovery-2 prepared for Kaloko Heights Associates, Honolulu, Hawai'i.

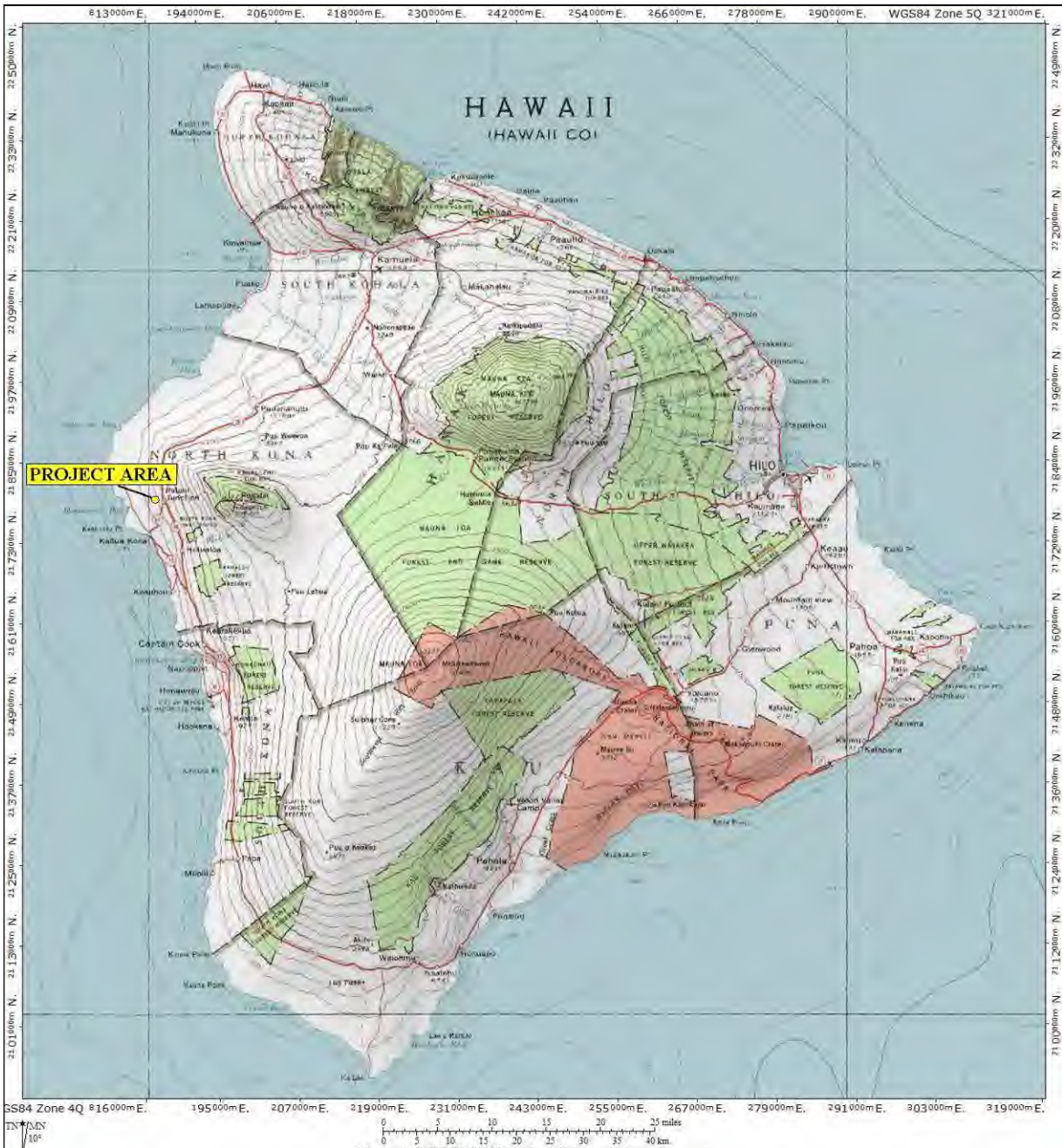
2006c *Preservation Plan for Kaloko Heights, TMK (3) 7-3-009:32.* SCS Report 541-Presevation-3 prepared for Kaloko Heights Associates, Honolulu, Hawai'i.

Wolforth, T., K. Johnson, and R. Calma

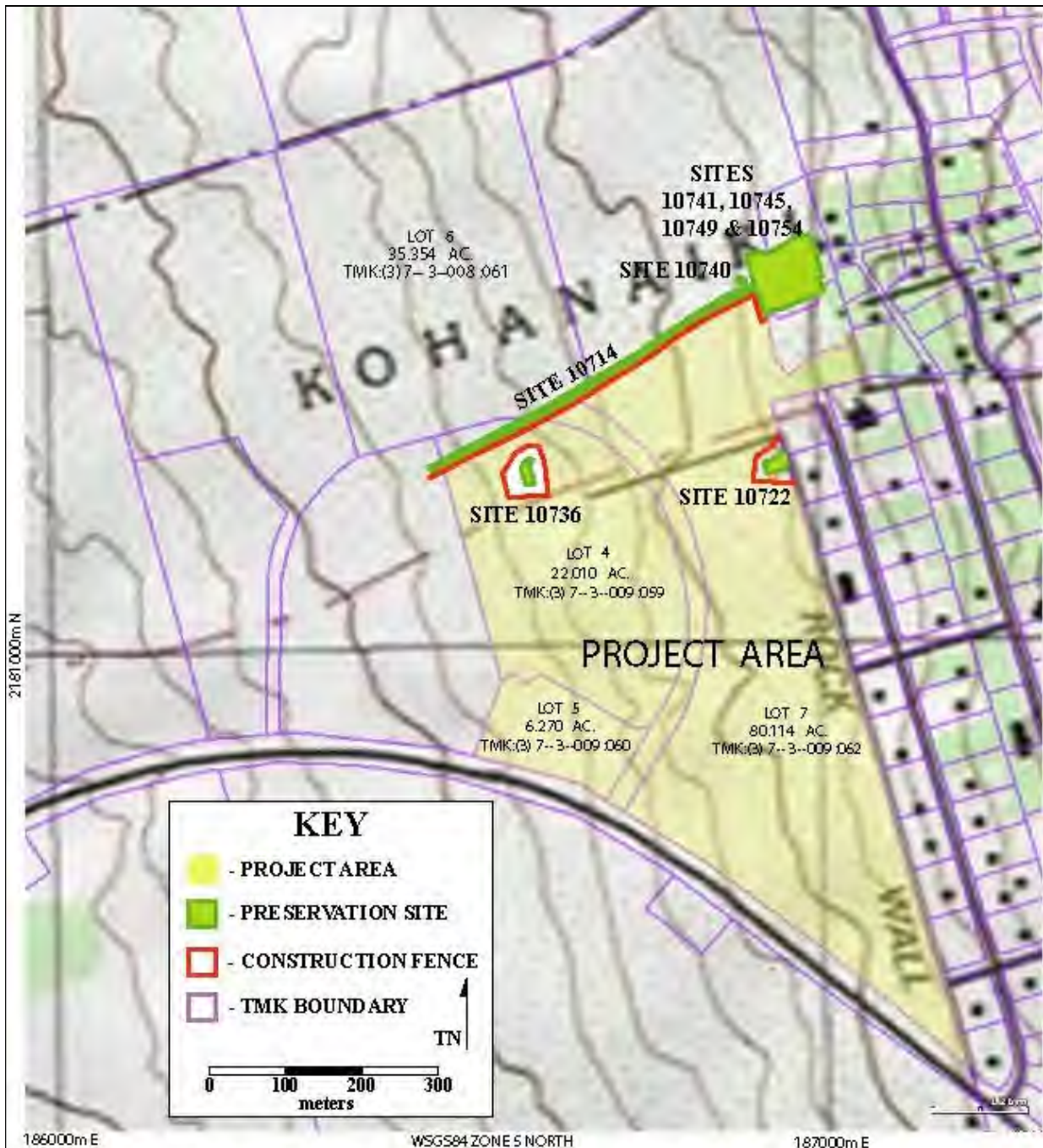
2009 *An Archaeological Data Recovery Report for the Kaloko Heights Project in Kohanaiki and Kaloko Ahupua 'a, North Kona District, Hawai'i Island, Hawai'i. [TMK 3-7-3-09:32].* SCS Report 714-DRR-1 prepared for Kaloko Heights Associates, LLC, Honolulu, Hawai'i.

Wolforth, T., C. Monahan, K. Johnson, and T Paikuli-Campbell

2005 *Archaeological Inventory Survey of the Northern Portion of the Kaloko Heights Project in Kohanaiki and Kaloko Ahupua 'a, North Kona District, Hawai'i Island, Hawai'i: Settlement Pattern Investigations in the Southern Kekaha Middle Elevations [TMK 3-7-3-09:32].* SCS Report 455-2 prepared for Stanford Carr Development, LLC, Honolulu, Hawai'i.

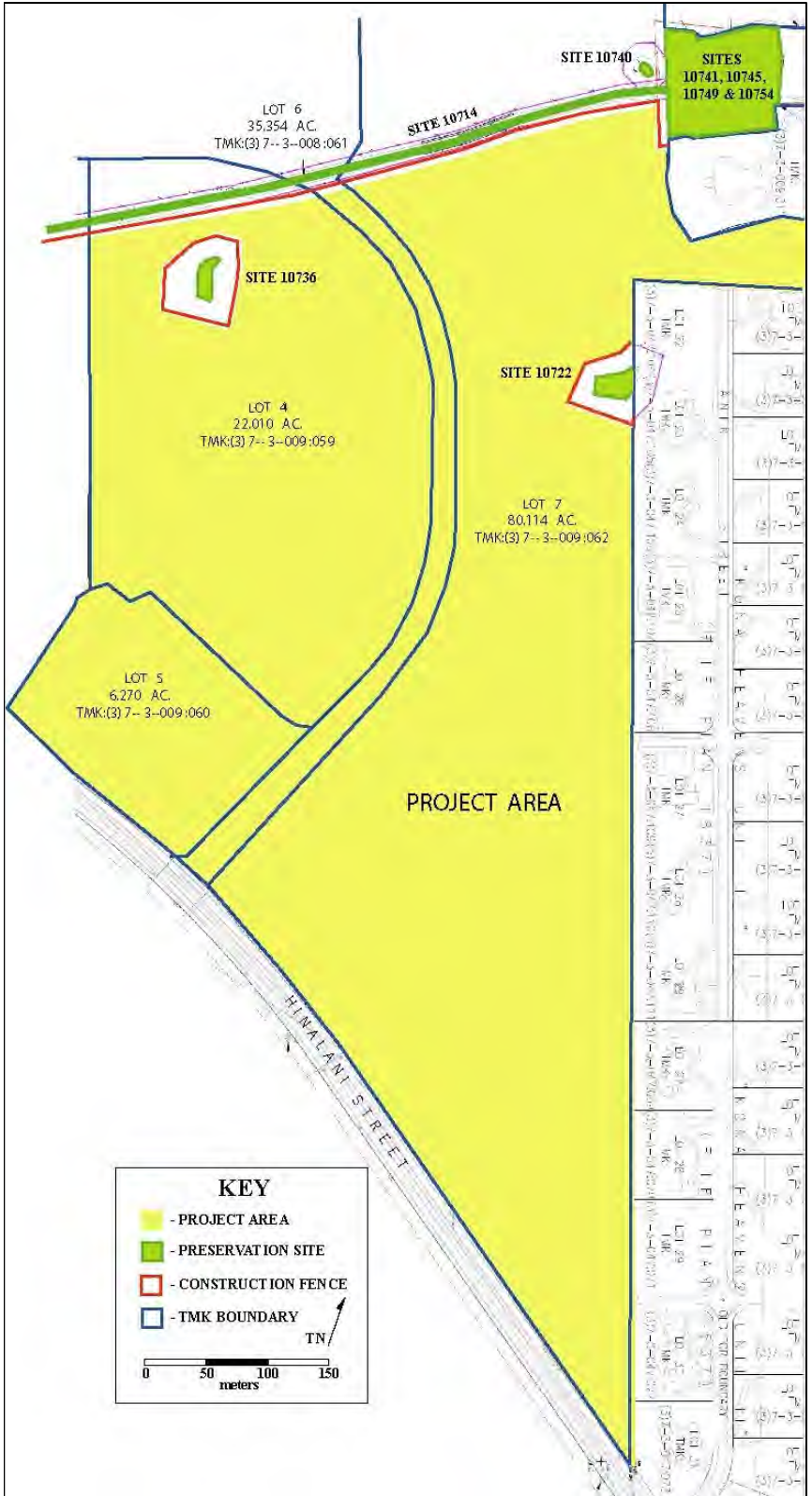


**Enclosure 1: 5,500 K-Series Map of Hawai'i Showing Location of Project Area**  
 (National Geographic Topo!, 2003. Sources: National Geographic Society, USGS).



**Enclosure 2:** 7.5-Minute Series USGS Topographic Map Showing Location of Project area, Archaeological Sites and Interim Construction Fencing (ESRI, 2011. Sources: National Geographic Society, USGS. Kailua Quadrangle).





**Enclosure 3: Project Area Map Showing Location of Project area, Sites and Interim Construction Fencing.**

**Enclosure 4: Road to the Sea Preservation Commitments.**



STANFORD CARR DEVELOPMENT, LLC

November 17, 2006

Christopher Yuen, Planning Director  
County of Hawaii  
101 Pauahi Street, Suite 3  
Hilo, Hawaii 96720

**SUBJECT: Kaloko Heights Master Planned Community, TMKs 7-3-9: 19, 32, 57 - 62**

Dear Chris:

In regards to the subject project, the roadway and water improvement construction plans that had been submitted in connection thereto, and issues related to the Kohanaiki Trail ("Trail") that runs through the property, I wanted to apprise you of recent developments between ourselves and a community group consisting of certain ohana members from the area (the "ohana group").

On Tuesday November 14<sup>th</sup> we conducted a second meeting with the ohana group at which we presented illustrations of plans to incorporate and preserve the existing Trail alignment within the planned community. A consensus was reached, and following are the results:

1. The original mauka-makai alignment ("footprint") of the Trail and public use and interests thereof shall be retained in perpetuity across the subject property.
2. The Trail will be at least 10-feet wide and will be bordered by perpetual open space buffers of at least 10-feet wide on each side. These buffers are intended to be sloped and otherwise modified as necessary to make grade adjustments. In combination with the buffers, the total width of this perpetual public right of way will be at least 30-feet throughout its length across the subject property.
3. In direct consideration of federal, state and county rules, regulations and laws relating to land use, subdivisions, streets and accessibility, and to further ensure a safer walking surface for the Trail user, vertical changes (that is, cutting and filling in comparison to the surrounding development) in the original Trail elevation may be necessary and will be allowed, as long as the horizontal alignment is kept the same. Such changes are to be kept to the minimum and, wherever possible and practical, the original Trail surface, rocks, and other cultural resources within the Trail, are to be set aside and re-incorporated and/or renaturalized as part of the Trail at its new elevation.
4. Wherever vertical changes are not required, the original Trail surface and other cultural resources located within the Trail, including, but not limited to, existing native trees, will be retained.
5. Whenever possible, cultural features found along the existing Trail (such as papamu/konane board) shall be retained and incorporated into the cultural landscape, in living celebration of and consistent with their cultural heritage and significance. Likewise, to the extent it is feasible and appropriate, significant cultural resources located outside the designated right of way and adjacent to the Trail, may be relocated within the right of way.
6. In further consideration of existing governmental rules and regulations pertaining to land use and requisite street and sidewalk requirements, the parties understand that it will be necessary to cross the existing Trail alignment at specific and limited points.
7. The proposed crossings of the trail are acceptable, as long as:



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PHONE: (808) 325-2255 • FACSIMILE: (808) 325-2257 • WEBSITE: [www.StanfordCarr.com](http://www.StanfordCarr.com)

**EXHIBIT "C"**

Enclosure 4: Road to the Sea Preservation Commitments (continued).

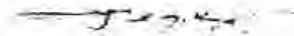
Christopher Yuen  
November 17, 2006  
Page 2 of 2

- a. pahoehoe from the project site, preferably from the Trail section that is being crossed, is embedded in the roadway paving as the means to mark where the original Trail footprint is located (similar to the "King's Trail" crossing the road to Anaehoomalu Bay); and
  - b. the number and width of such crossings are kept to an absolute minimum and, in no case, to exceed a maximum of four.
8. Other development-related items discussed and agreed upon:
- a. Whenever existing rock walls must be removed, the rocks from these walls will be set aside and reused in the construction of new screen, buffer and retaining walls built within the project.
  - b. Whenever possible, rocks from the subject property will be used for such walls (minimize importation of rock from offsite).
  - c. To promote and encourage traditional and customary cultural practices, the harvesting of native woods (such as alahoe, elama, manele, iliahi and ulei) as well as other exotics like mango, from trees downed during the grubbing work or ones that must be removed during permitted land grading, will be allowed by ohana members and/or their designated representatives. If requested and where possible and practical, the landowner or his designated representative(s) will assist the ohana in the gathering and temporary storage of such woods. Such activities will be coordinated in advance with site personnel.
  - d. Members of the ohana group will assist the landowner in understanding and compiling oral histories related to the subject property and area, so these can be used within the new community (such as for neighborhood identities, street names, and the like – initial suggestion was for use of names associated with the old homesteads).
  - e. With the vision of perpetuating the life of the land in that which is pono (righteous) and to promote better understanding and aloha among the parties and the larger community, the landowner and ohana group wish to continue to meet, consult and cooperate regarding the protection and incorporation of Hawaiian cultural perspectives, traditions and practices in appropriate areas and segments of this project, as well as related properties.

Curtis Tyler is a member of the ohana group, and he has agreed to distribute this letter to the other members.

Should you wish to discuss any aspect of the above, please feel free to contact me 325-2255.

Sincerely,



Paul J. Kay  
Vice President/Sr. Development Manager  
STANFORD CARR DEVELOPMENT, LLC

encl. Kaloko Heights Master Planned Community Site Plan, rev. 11/17/06

cc: Curtis Tyler  
Peter Young, DLNR  
Paul Conry, DOFAW  
Curt Cottrell, Na Ala Hele  
Irving Kawashima, Na Ala Hele  
Debbie Chang, Na Ala Hele Advisory Council  
Brad Kurokawa, Planning  
Daryn Arai, Planning  
Steve Lim, esq.  
Stanford Carr





**Enclosure 5:** Photograph of Site 10714 Construction Buffer Looking West.



**Enclosure 6:** Photograph of Site 10714 Construction Buffer Looking East.



**Enclosure 7:** Photograph of Site 10714 Construction Buffer Looking West.



**Enclosure 8:** Photograph of Site 10714 Construction Buffer Looking East.



**Enclosure 9:** Photograph of Site 10722 South Side Construction Buffer Looking East.





**Enclosure 10:** Photograph of Site 10722 West Side Construction Buffer Looking Northwest.



**Enclosure 11:** Photograph of Site 10722 North Side Construction Buffer Looking South.



**Enclosure 12:** Photograph of Site 10736 North Side Construction Buffer Looking East.



Photograph of

**Enclosure 13:** Site 10736 North Side Construction Buffer Looking Northeast.



**Enclosure 14:** Photograph of Site 10736 North Side Construction Buffer Looking North.

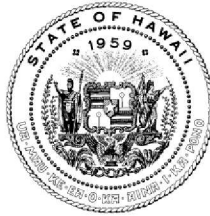


**Enclosure 15:** Photograph of Homestead Preservation Area (Site 10749) Construction Buffer Looking Northwest.



**Enclosure 16:** Photograph of Road to the Sea and Site 10749 Construction Buffer Looking East.

DAVID Y. IGE  
GOVERNOR OF HAWAII



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

ROBERT K. MASUDA  
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JEFFREY T. PEARSON  
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KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
KAKUHIHEWA BUILDING  
601 KAMOKILA BLVD, STE 555  
KAPOLEI, HAWAII 96707

October 4, 2018

Michael Yee, Planning Director  
County of Hawaii  
101 Pauahi Street, Suite 3  
Hilo, HI 96720

IN REPLY REFER TO:  
Log No.: 2018.00868  
Doc. No.: 1808SN10  
Archaeology

Dear Mr. Yee:

SUBJECT: **Chapter 6E-42 Historic Preservation Review – REVISED COMMENTS  
County of Hawaii Grading and Grubbing Permits – RCFC Kaloko Heights LLC  
Kohanaiki and Kaloko Ahupua‘a, North Kona District, Island of Hawai‘i  
TMK: (3) 7-3-009:058, 059, 060, 061, and 062**

This letter updates the grading project area acreage and TMKs and the State Historic Preservation Division's (SHPD's) review of the subject permit application received by our office on April 10, 2018. The project area has been revised from 47.68 acres to 57.13 acres. Thus, a 57.13-acre portion of the 162.91-acre parcel will be grubbed and graded to accommodate the construction of a housing subdivision. Additionally, SHPD received confirmation that permit application involves only TMK: (3) 7-3-009:058, 059, 060, 061, and 062 (email, October 3, 2018, from Steve Tomei [Kaloko Heights project engineer]); the grading will not extend into TMK: (3) 7-3-009:032 and 057 which were included in SHPD's earlier letter.

The previous submittal provided information that the entirety of 57.13-acre project area has been subjected to prior archaeological survey (Barrera 1991 and Wolforth et al. 2005). The Wolforth et al. (2005) AIS was conducted by Scientific Consultant Services, Inc. (SCS). Their AIS report was accepted on October 24, 2005 (Log No. 2005.2296, Doc. No. 0510NM42). In compliance with AIS mitigation commitments, SCS completed a Burial Treatment Plan (Wolforth 2006a [Doc. No. 0611KL09]), a Preservation Plan (Wolforth 2006c [accepted; Log No. 2006.2021, Doc. No. 0606CM16]) and a Monitoring Plan (Wolforth 2006b [accepted; Log No. 2006.2022, Doc. No. 0606CM17]). A Data Recovery Report (Wolforth et al. 2009) was submitted to SHPD on April 24, 2009; it has not yet been reviewed.

**SHPD requests** the proposed grading/grubbing activity proceed under the SHPD-approved Wolforth (2006b) archaeological monitoring plan. SHPD has received photographs and written verification of the implementation of the interim protection measures. The County may proceed with the grading permit issuance process.

**SHPD requests** written notification of project initiation. Following completion of archaeological monitoring, SHPD looks forward to receiving an archaeological monitoring report meeting the requirements of HAR §13-279-5 for review and acceptance.

Please contact Sean Nāleimaile at (808) 933-7651 or [Sean.P.Naleimaile@Hawaii.gov](mailto:Sean.P.Naleimaile@Hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,  
*Alan Downer*

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

cc: [ggescott@yahoo.com](mailto:ggescott@yahoo.com); [stevetomei@samhirota.com](mailto:stevetomei@samhirota.com); [mmeyer@hh1898.com](mailto:mmeyer@hh1898.com); [wlmoore@outlook.com](mailto:wlmoore@outlook.com)