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DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
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December 11, 2019

Mr. Daniel Orodener, Executive Officer  
Department of Business, Economic Development and Tourism  
P.O. Box 2359  
Honolulu, HI 96813  
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IN REPLY REFER TO:  
Log No.: 2019.01514  
Doc. No.: 1912SN03  
Archaeology

Dear Mr. Orodener:

**SUBJECT: Chapter 6E-8 Historic Preservation Review -  
Docket No. A19-807/Trustees of the Estate of Bernice Pauahi Bishop  
dba. Kamehameha Schools  
Request for Determination on a Petition for a Land Use Boundary Amendment  
Kauaea Ahupua'a, Puna District, Island of Hawai'i  
TMK: (3) 1-3-009:005 (por.)**

This letter provides the State Historic Preservation Division's (SHPD's) comments regarding (1) a *Petition for Land Use District Boundary Amendment to reclassify approximately 94.107 acres of land* from conservation district to agricultural district, and (2) *confirmation that the proposed 94.107-acre Petition Area has been reasonably addressed in the prior AIS (Haun and Henry 2013), and that the requirements of Hawai'i Revised Statutes Section 6E have been met.*

The Haun and Henry (2013) report included a 309-acre portion of a 680.92-acre property that included the petition area and documented six (6) sites comprised of ten (10) features, all of which were newly identified (SIHP Site 50-10-55-29723 through 50-10-55-29728). One of the sites, a portion of the Kauaea Trail (Site 29723) is determined to be Pre-contact in age; the remaining sites are historic in age and include roads (Site 29724), a survey marker (Site 29725), a sugarcane loading ramp (Site 29726), a trig station (Site 29727), and a railroad grade (Site 29728). A 4.5-meter section of the approximately 91-meter-long Kauaea Trail within the project area was mapped. The survey also included and documented 20 caves and three overhangs. All of these natural features were thoroughly inspected and determined to have no evidence of cultural use or modification.

In a letter dated September 23, 2013 (Log No. 2013.4598, Doc. No. 1309SN12), SHPD concurred with significance assessments for all six sites as being significant under Hawaii Administrative Rules (HAR) §13-284-6 Criterion "d." Site 29723 was also assessed as being culturally significant under Criterion "e" as a named trail. SHPD concurred with this assessment as well. SHPD concurred with the recommended treatments that no further work or preservation is necessary for Sites 29724 through 29728. SHPD also concurred with the recommendation of preservation for Site 29723.

An archaeological preservation plan (Haun and Henry, 2013) was prepared for Site 29723 that included preservation measures to ensure the conservation and perpetual preservation of the Kauaea Trail as recommended in the AIS. The plan indicated that a 10-ft-wide permanent buffer would be established for Site 29723 and a temporary 15-ft-wide buffer would be implemented during any construction activities. Additionally, the permanent buffer would be subject to a metes and bounds survey and be recorded with the Bureau of Conveyances. The landowner is

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responsible for the maintenance of the site and no public access is provided. In a letter dated January 24, 2014 (Log No. 2014.02243, Doc. No. 1406SN18), SHPD reviewed and accepted the preservation plan for Site 29723. No other mitigation measures are outstanding for the petition area.

Based on the information provided, **SHPD's comments are as follows:**

- (1) **SHPD has no objection to** the *Petition for Land Use District Boundary Amendment* to reclassify approximately 94.107-acres of land from conservation district to agricultural district.
- (2) **SHPD requests** the opportunity to review any ground-disturbing activities that may impact Site 29723 prior to any future permitting.

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

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