



STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

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November 30, 1995

Ms. Virginia Goldstein, Director
Planning Department/County of Hawaii
25 Aupuni Street
Hilo, Hawaii 96720

LOG NO: 16048 ✓
DOC NO: 9511RC55

Dear Ms. Goldstein:

SUBJECT: **County of Hawaii SMA 95-3 & Change of Zone 95-12 --Oceanside 1250
Hokukano & Others, North Kona & South Kona, Hawaii**

In late September 1995, our office received copies of County Planning Commission documents approving these applications. We were concerned about these approvals, because our office was not asked to comment on these applications. Our major concern is that historic preservation review of this project is still ongoing and continued approval of development actions prior to conclusion of review could have adverse impacts on extremely important historic sites in this project area. We need to better coordinate our planning efforts on this project.

When these letters arrived, we were within our 30 day review of the 3rd draft of the archaeological inventory survey report of this overall project. The prior drafts of the report had many flaws. We had not yet concluded all sites were found, which sites were significant, and most important which sites merited preservation or data recovery. We have since completed our review (attached). The report will need revision yet again, to be an acceptable scientific inventory of what was found -- and to enable the public to clearly see what was found. However, we were able to agree that all sites had been found (with one condition), and to agree on site function. We are still working out significance evaluations, which we believe can be easily done, but which will result in a substantial change in the evaluations. More important, we are still working out mitigation agreements, and we do not yet agree with the proposals for preservation and data recovery.

This project area contains extremely important historic sites. It is the last large area in Central Kona where much of the prehistoric settlement ruins are still intact. (There has been some destruction, but much remains.) It, thus, contains large landscapes of historic sites vital for interpretive preservation planning for the local public and visitors and vital for long-term scientific research. For interpretive concerns, this area has coastal housing ruins (with burials and heiau of

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different types) which are excellent examples of many housing types. The landowner (Oceanside 1250) is amenable to preserving important parts of this housing landscape along the shore (Hokukano's housing, Pu'u 'Ohau and its burials, and Nawaa Bay's housing in the Keekee area). But, the form of the historic preserves along the shore has not been discussed or been worked out, and is somewhat complicated by shoreline recreation use plans. Upon review of this draft of the report, it has been clear that we need to discuss these shoreline preserves more with the landowner. We have also asked if a strip of landscape can be preserved from the shore up through the agricultural fields, since the report clearly indicates that excellent examples of the Kona Field Systems (with kuaiwi walls) extend down very close to the shore and these areas contain excellent examples of house sites and religious structures within the fields. No such slice of the Kona Fields landscape has yet been preserved at these elevations, and it may be one of our last chances to do so. We suggested it might be considered to extend this slice up from Nawaa Bay, so interpretation of the shore and uplands could be linked. We believe the potential of this area for public interpretation is of great value. We are awaiting a meeting with Oceanside 1250 to discuss these possibilities. One of our concerns, however, is that if the County has approved sweeping landuse commitments for areas in the uplands (e.g., for housing or golf courses or farming), the possibility of such historic preserves may be difficult to negotiate at this time. Another concern is that with approval of permits by the County before the historic preservation concerns are worked out, confusion results because multiple land use plans exist (e.g., recreation, historic preservation, etc. along the shore).

Second, long-term research concerns in this area are extremely important. With the settlement landscape intact, this may be the last place in Central Kona where archaeologists can have an excellent opportunity to answer broad and important questions on Hawaiian history for Kona, Hawaii Island, and all the islands. Population growth in fertile areas can be studied by looking at house sites here; it cannot in most other areas of Kona or Hawaii, where only a few house sites have survived in coastal areas. Similarly, the development of complex social ranking can be studied here by looking at house sites of all social ranks. The growth of the field systems over time, and their intensification in relation to population and social ranking changes can also be looked at here. These are major questions for understanding prehistory, ones that have yet to be adequately answered. And honestly, a typical historic preservation review procedure of one data recovery field session (although it would be quite large and expensive for this area) would not be adequate to address the research questions in this area -- because the area is so large and has so many sites. A multi-year project would be needed. If, however, we can work with the landowner to preserve sizable slices of the landscape, such long-term work can be feasible, and at the same time the cost and scope of the immediate data recovery work might be considerably reduced.

Again, we do hope to meet with the landowner, Oceanside 1250, in the near future on these matters. Hopefully, we can finalize the mitigation plans to the satisfaction of all parties. We are fortunate that Oceanside 1250 has had a very positive attitude toward historic preservation and Hawaiian history. We understand that review of the archaeological inventory survey report has been a long and frustrating slow process for all involved, but we are very close to getting an acceptable report completed. We do want to better coordinate the historic preservation

concerns in with your permitting process. We would like to make several suggestions to help reach this goal. When we meet with Oceanside 1250, could one of your staff also attend, so the details and status of the mitigation planning is available to your department, and so County concerns can be discussed? Also, if future permit applications are submitted, can you be sure that they are sent to us? At least, we can advise your office on the status of the historic preservation review and of any potential problems. And hopefully, by that time all mitigation concerns will be worked out, so we can actually give a finalized status to your department.

Aloha,

A handwritten signature in black ink, appearing to read 'Don Hibbard', with a long horizontal flourish extending to the right.

DON HIBBARD, Administrator
State Historic Preservation Division

RC:amk

Attachment (copy of 9509rc12)