



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 6TH FLOOR
HONOLULU, HAWAII 96813

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January 14, 1994

Donna Fay K. Kiyosaki, P.E.
Chief Engineer
County of Hawaii Department of Public Works
25 Aupuni Street, Room 202
Hilo, Hawaii 96720

LOG NO.: 10567 ✓
DOC NO.: 9401ks08

Dear Ms. Kiyosaki:

**SUBJECT: Grubbing and Grading of Historic Sites--Apparent Violation of
Grubbing and Grading Permit
Opihiale 1st, South Kona, Island of Hawaii
TMK: 8-7-13: 006**

Our Hawaii Island archaeologists, Marc Smith and Kanalei Shun, conducted on January 10, 1994 a field inspection of the mauka end of the subject parcel adjacent to Mamalahoa Highway. It is our understanding a grubbing/grading permit was issued to improve an already existing jeep road to provide access into the property. Our office would normally have no concerns with the issuance of such a grubbing/grading permit since the existing road would have altered the land surface; however, it is apparent from the field inspection in this case that the grubbing/grading has gone beyond and outside of the existing jeep road by more than 30 feet in some instances. The swath that has been bulldozed and cleared ranges from 30 to 60 feet wide. Our staff only viewed the first 300 feet from the edge of Mamalahoa Highway.

Our office is concerned that damage to historic sites may have resulted from this activity, since the grubbing wandered into previously undisturbed areas outside of the old jeep road corridor. During the field inspection, historic sites such as rock walls, enclosures, and mounds were observed next to the grubbed corridor. Our office is aware that an archaeological inventory survey was undertaken in the subject parcel, and a large number of historic sites were located. Unfortunately, the report documenting the findings of that survey has yet to be submitted to our office for review. However, based on previous archaeological inventory surveys conducted in Opihiale 2nd, the adjoining ahupuaa to the south, historic sites should be present in the subject parcel. These historic sites are likely to include surface habitation structures, lava tube habitation shelters, trails, burial mounds,

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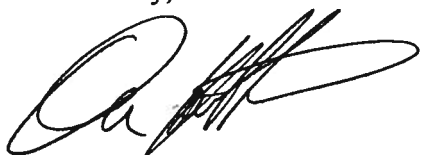
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lava tubes with burials, and agricultural terraces and mounds. It seems likely that historic sites could have been destroyed in the grubbing/grading.

Given this situation, we would recommend that your staff and our staff walk the road and evaluate if sites have been damaged and the nature of after-the-fact mitigation that might be needed, if any. Also, we would recommend that any additional permits for this parcel undergo historic preservation review. In most cases, an archaeological inventory survey would be needed to determine if significant historic sites are present. A mitigation plan might then be needed, if significant historic sites are present. It would be useful to have the applicant submit the findings from the archaeological survey that has already been done. This would help both of our agencies for planning, and we could advise more specific (and possibly less expensive) scopes for future permit applications.

If your office should have any further questions, please contact Kanalei Shun at 587-0007.

Sincerely,



DON HIBBARD, Administrator
State Historic Preservation Division

KS:jt

c: ✓ Virginia Goldstein, Planning Department
Ruby McDonald, West Hawaii Office of Hawaii Affairs
Rodney Oshiro, Na Ala Hele