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DEPARTMENT OF LAND AND NATURAL RESOURCES**

601 Kamehikila Boulevard, Suite 555
Kapolei, HI 96806

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December 17, 2012

Hallett H. Hammatt, Ph.D.
Cultural Surveys Hawaii
PO Box 1114
Kailua, Hawaii 96734

LOG NO: 2012.2602
DOC NO: 1212MV09

Subject: **Chapter 6E-42 Historic Preservation Review -
Revised Archaeological Inventory Survey for the Kamehameha Schools Infrastructure Project
Kahauloa and Ke'ei 1st and 2nd Ahupua'a, South Kona District, Island of Hawai'i
TMK: (3) 8-3-004:001 & 8-3-005:001**

Thank you for submitting the revised draft report titled *Revised Archaeological Inventory Survey for the Kamehameha Schools Infrastructure Improvements Project Kahauloa and Ke'ei 1st and 2nd (Ke'ei and Ke'ei Nui) Ahupua'a, South Kona District, Island of Hawai'i* TMK: (3) 8-3-004:001 & 8-3-005:001 (H. Hammatt and D. Shideler), March 2012. This report was received by our office on August 30, 2012. We apologize for the delayed review and thank you for your patience. According to this report, Kamehameha Schools has a great deal of freedom in choosing specific road and waterline across their Ke'ei lands. The purpose of this study was to identify corridor alignments that would have little or no impact on cultural properties. In order to accomplish this objective a larger area was subjected to an archaeological reconnaissance survey, and alignment was selected that would avoid any impact to historic properties. This alignment is a total of 2.38 acres, and contains no historic properties. The changes that were made to this report are the result of the SHPD review of a previous draft of this report (Log 2012.0900, Doc. 1206MV25). The majority of our concerns were addressed. However, our final concern about the need for an archaeological monitor remains.

In our initial review we requested a map locating all the sites that were identified during the reconnaissance and a table listing the site, its sub-features, its probable function, and nature of work at each site. This information was included and it indicates that the reconnaissance survey identified the locations of 33 historic properties in the vicinity of this project area. These sites were recorded in the State Inventory of Historic Places (SIHP) as site numbers 50-10-47-29452 through -29484. Because they are outside of the project area these sites were not recorded to standards that meet the guidelines of HAR 13-276, and no significance assessments or treatment recommendations were presented for them. Any future project activities with the potential to adversely affect these sites will require an archaeological inventory survey to record and assess these sites. The report does provide information on the proximity and potential significance of these sites; however, with no interim protection measures in place, we are concerned that project activities may inadvertently extend beyond the identified project area and impact the unrecorded sites. Therefore, we request that an archaeological monitor be onsite to ensure that the protection of the archaeological sites in the immediate vicinity of this project area. Please include this recommendation in a revised draft report for SHPD review. To aid in a review of the subsequent submittal please submit a cover letter that specifies the changes made to this document and their page numbers. Please contact Mike Vitousek at (808) 652-1510 or Michael.Vitousek@Hawaii.gov if you have any questions or concerns regarding this letter. We look forward to the opportunity to review an archaeological monitoring plan that meets the standards of HAR 13-279 prior to the commencement of project activities.

Aloha,

Theresa K. Donham
Archaeology Branch Chief