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August 23, 2012

Bobby Jean Leithead-Todd, Director
c/o Esther Imamura
County of Hawaii Planning Department
101 Pauahi Street Suite 3
Hilo, HI 96720

LOG NO: 2012.2488
DOC NO: 1208MV21
Archaeology

Dear Ms. Leithead-Todd:

**SUBJECT: Chapter 6E-42 Historic Preservation Review -
Special Management Area Use Permit Application (SAA 12-000769)
Kamehameha Schools Ke'ei Waterline Infrastructure Improvement 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 the opportunity to review the aforementioned permit application that was received by our office on April 14 2012. We apologize for the delayed review and thank you for your patience. According to the application, KSBE proposes to replace eight existing "Drisco" lines with a single 8 inch, partially buried, waterline.

Our office received a copy of the archaeological inventory survey (AIS) report that was prepared in connection with this project (*Archaeological Inventory Survey for the Kamehameha Schools Infrastructure Improvements 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*, H. Hammatt and D. Shideler, March 2012). Our review requested a number of major revisions in the report; we had concerns with the methodology, recordation, site assessments, and assessment of project effect (Log 2012.0900, Doc. 1206MV25). Please see the attachment for an indication of the revisions and additional information requested.

We have not received a revised copy of this report, and agreed-upon mitigation measures have not been determined for this project. Therefore, we recommend that the permit approval is deferred until the report is revised to address the deficiencies, and SHPD is given the opportunity to review and accept the revisions. At that time, appropriate mitigation measures will be forwarded to your office as recommended conditions for permit approval. Please contact Mike Vitousek at (808) 652-1510 or Michael.Vitousek@Hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

Theresa Donham
Archaeology Branch Chief



ATTACHMENT

Comments and Questions: *Archaeological Inventory Survey for the Kamehameha Schools Infrastructure Improvements 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* (H. Hammatt and D. Shideler), March 2012

List of Figures

1. Page Viii: The reference page for figure 53 contains the message "Error! Bookmark not defined."

Introduction

2. Please include a detailed description of the proposed project. The project background section simply identifies the project as "possible road and waterline alignments." Please indicate what the location, nature, and extent of the proposed project activity is. Specifically, the description of the proposed roadway work should include the exact specification and dimensions of all proposed work so that the potential effects of the project on nearby historic properties can be identified.

Methods

3. The explanation of the archaeological methods employed in the "Field Methods" section on page 9 is: "Standard archaeological inventory practices were employed." This statement does not adequately address the requirements of HAR 13-276-5(c) (3) through (8). In addition, this statement does not accurately reflect the nature of this field work due to the "somewhat unusual (pg. ii)" circumstances surrounding the land owner's freedom in choosing specific alignments. The methods section should include a description of how a reconnaissance survey was undertaken to identify potential project areas, and then how an intensive archeological inventory survey was undertaken of the identified project area
4. The methods section should include the extent of the reconnaissance survey coverage, and indicate whether a 100% pedestrian survey was undertaken on the project area.
5. The methods section should also include a discussion of any factors which limited the survey effort, the techniques used to identify historic properties, the extent of historic property recording, the methods used to plot site locations, and the methods used to determine a site and its boundaries.

Results of Fieldwork

6. When the exact specifications of the proposed project have been established, and the area of potential effects for this project has been determined, all historic properties within the area of potential effects, or project area, should be recorded pursuant to HAR 13-276-5(d), assessed for significance in accordance with 13-276-7, and provided with a recommended treatment pursuant to HAR 13-276-8). In addition, the effect or impact of the project on the significant historic properties shall be determined pursuant to HAR 13-284-7 (a).
7. Sites that are outside of the area of potential effect of this project will not need to be recorded to AIS standards and will not need to have significance assessments or treatment recommendations. However, page i. indicates that this field work was carried out under CSH's annual archaeological field work permit No. 11-17 and 12-04. As a condition of the permit to conduct archaeological work in the State of Hawaii (HAR 13-282-3 (f) (1): the permittee shall submit, within one month of the conclusion of any field work a brief report on the findings to consist of:" a map locating all the sites studied and a table listing the site, its sub-features, its probable function, and nature of work at each site. We appreciate that the map of the sites was included in Appendix b. For the sites that were recorded within the reconnaissance area that are not the AIS area, we request that the appropriate SIHP site is identified, whether previously known or newly assigned, and a table with the necessary information pursuant to HAR 13-282-3 (f) (1) (B) is included.

Field Work for Waterline Improvements

8. Specifically, pg. 45 states that "A ko'a (fishing shrine)-like assemblage (discussed in Appendix B of this study as temporary Site CSH 1) is believed to lie far enough from Ke'ei Beach Road as not to be affected by likely improvements to this road." Analysis of the project specifications/plans should be used to determine whether or not Site CSH 1 is outside the project area. Without any description of the

project area it is difficult to determine whether this site will be affected. If it is determined that this site, or any other site, is within an area that could potentially be affected in one or more of the definitions of effect established in HAR 13-284-7 (b), then this site, or sites, should be adequately recorded pursuant to HAR 13-276.

9. Page 46, please identify the Historic Properties in figure 19 and 20 with the appropriate SIHP numbers.
10. Page 51 indicates that the origin of the wall (Site 6022) "may well be pre-contact." However, later on page 51 the report states the trail (Site 6022A) was impacted by the (post contact?) boundary wall." Please address this inconsistency and if the age of the wall is undetermined please specify.
11. Page 51 - please provide photographs and or illustrations of the trail that was determined to be feature A of SIHP -6022 (HAR 13-276-5(d) (4) (E). If that will not adequately identify the site please provide a drafted plan map to scale (HAR 13-276-5(d) (4) (F).
12. Page 51 - why was the trail (Site 6022A) lumped in as a feature of the ahupua'a boundary wall (Site 6022)? If the trail pre dates the wall and was impacted by the construction of the wall it should have an independent site number. If it was developed as an additional boundary marker and serves a similar function then the designation of the sub feature is more appropriate. However, the methods used to determine the site should be justified pursuant to HAR 13-276-5(c)(8).
13. The statement on page 53 that, "in order to keep any proposed roadway entirely in Ke'ei Ahupua'a (if this is a concern at all), a newer road would need to be shifted south of the existing jeep road, indicates that the project impacts are not known and therefore the project area cannot be accurately defined. Please consult with the land owner about the proposed project and present an accurate representation of the project area for SHPD review.

Field Work for Waterline Improvements

14. Again, the location, nature, and extent of the project activities appear to be unknown. Page 55 states that the waterline "may be partially or completely buried," it also states "the density of sites observed and reported on at the reconnaissance level in Appendix B) suggests consideration of trying to keep the waterline within the existing graded and grubbed telephone alignment." The same paragraph later states that "There may also be good reason to try to keep the telephone line road relatively free of encumbrances and/or to avoid placing a waterline where it might be impacted by occasional vehicular activity." Please identify the precise location of the project area and perform an intensive AIS of that project area.
15. Page 55 - were the remnants of archaeological sites found in the margins of the road and midden scatters found within the road that are believed to have been impacted by the construction of the roadway recorded in Appendix B? Do they retain enough integrity (location and materials for archaeological sites) to be potentially considered significant historic properties? Are there any intact subsurface components of these sites that would be impacted by trenching through them?
16. Page 55 also states that "In general terms, the density of more significant (non-agricultural) sites appears to be slightly less on the west (makai) side of the road. Why have you determined agricultural sites to be less significant than non-agricultural sites?

Summary and Recommendation

17. Please revise the summary section on page 57 to include the revisions requested in this correspondence.
18. Site -6022 is assessed as significant under Criteria "d" and "e", and Feature A (-6022A) is assessed as significant under Criteria "d" (page 57). We believe the trail is also significant under Criterion "e" and possibly "c", depending on the additional information submitted relative to revision #11.
19. We believe that significance Criteria "c" and "e" should be added to trail Sites 29232 and 29233, due to their distinctive a'a trail characteristics and construction, as well as their cultural value to native Hawaiian people.

20. We agree with the recommendation to preserve these sites, and we look forward to the opportunity to review a preservation plan that meets the requirements of HAR 13-277. We also look forward to the opportunity to review any additional treatment recommendations for sites that fall within the APE that were not addressed in this report, such as CSH 1 or any of the historic properties on the margin of the road way.
21. We appreciate your intentions to preserve the trails that are located on this property. In addition to preservation, we encourage the land owners to consult with DLNR's Na Ala Hele program to determine if these trails are eligible for incorporation into the state trail system; because these trails are determined for preservation, consultation with Na Ala Hele does not have to be completed prior to acceptance of this report.
22. Page 58 states that "possibly discussions with local kupuna and kama'aina could resolve the significance of this possible historic property." We agree, this report should contain consultation with individuals knowledgeable about the project area pursuant to HAR 13-276-5 (g).
23. Page 59 indicates that "it may be possible to run a "ditchwitch" or some such excavator along the road to carve out a waterline channel. If "burial" of any new waterline is indeed indicated we do not believe that it could go off the road along the margins of the telephone line road without impacting archaeological sites." These methods differ from the methods described to our office by KSBE land managers. According to KSBE, no heavy machinery will be utilized in the laying of the waterline. Please coordinate with the land owner and provide SHPD with a clear indication if what this project entails. To simplify the subsequent review it would be easiest to provide a detailed project description once, at the beginning of the report.
24. Should an archaeological monitoring program be employed during this project given the presence of cultural materials within the roadway?

Kathie

COMMENT
ACTION
REPORT
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