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PLANNING DEPARTMENT  
COUNTY OF HAWAII

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April 2, 2007

State of Hawai'i Dept. of Land & Natural Resources  
Office of Conservation and Coastal Lands  
P.O. Box 621  
Honolulu, HI 96809

SUBJECT: CDUA HA-3407, CDUA HA-3404, & CDUA HA-3403

To whom this concerns:

This letter is to comment on the above-mentioned CDUAs which were published in the OEQC bulletin dated March 8, 2007. I have not seen the CDUA submittals and am writing to you to make sure that the public access, historic trail, and/or archaeological concerns on the subject properties are addressed.

TMKs: (3)8-7-05: 1, 2, 10-19 (CDUA HA-3407)

The TMK clearly indicates the presence of a trail, probably the historic Hawaiian shoreline trail which runs laterally along (or in the vicinity of) the coast. The historic shoreline trail has been identified on lands further south and was likely continuous through the subject properties. Although the map shows it as terminating at parcel 10, it is not uncommon for the TMKs to show historic trails as remnants when they are actually continuous. Effort should be made to determine whether the State of Hawai'i has an ownership interest in any and all historic trails on the subject properties. A thorough archaeological survey would help to reveal the presence of *mauka-makai* and lateral historic trails as well as other culturally important sites. Such an archaeological survey should be required prior to any grubbing or grading, because (1) the subject area is remote and undeveloped; (2) concentrations of historic sites are present; and (3) the Land Commission Award parcels are indicative of historically settled sites that may contain burials and other important historic and cultural resources. Lateral, shoreline public access should be required, as it has been further south on TMKs: 8-7-07: 7 and 8. All sites and areas that are required to be preserved and protected following the historic preservation review process need to be clearly identified on the final subdivision maps so that all subsequent permit reviewers will know the location of those resources.

TMKs: (3)8-3-05: 10, 12, & 13 (CDUA HA-3404)

I have two concerns re: TMK:8-3-05:13. First, the State of Hawai'i's Nā Ala Hele program needs to review and approve the disposition of the historic trail that is clearly shown on the TMK, as has been done with other parcels affected by this trail. Public access along the shoreline has been required on other parcels in this area. Second, the public's right to use the County-owned Kahauloa Road to get to the bay should be affirmed. Kahauloa Road runs along the northern boundary of parcel 13. The right of *mauka-makai* public access using Kahauloa Road is key to enabling people to use lateral, shoreline public accessways that are

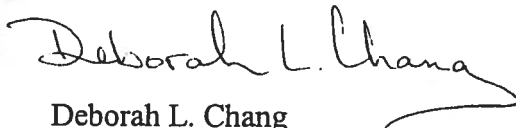
being required in this area. For years public access to Kahauloa Bay via Kahauloa Road has been denied by a commercial kayak operation that occupies Kahauloa Road at its terminus.

TMKs: (3)8-8-02: 14, 17, & 22 (CDUA HA-3403)

Again, the Nā Ala Hele program should determine if there are any State-owned historic trails within these parcels. The traditional, lateral shoreline trail should be continued throughout these properties, just as it has been identified further north on TMKs 8-7-11: 1, 2, 3, & 6 and 8-7-14: 6. Archaeological survey should be required prior to any grubbing or grading due to the high potential for previously undisturbed cultural and historic sites in these remote and undeveloped properties. All sites and areas that are required to be preserved and protected following the historic preservation review process need to be clearly identified on the final subdivision maps so that all subsequent permit reviewers will know the location of those resources.

Mahalo for your consideration of these comments and concerns. I can be reached at (808) 776-1516 should you have questions.

Sincerely,



Deborah L. Chang

c: ✓ Christopher Yuen, Hawai'i County Planning Department  
Irving Kawashima, Nā Ala Hele