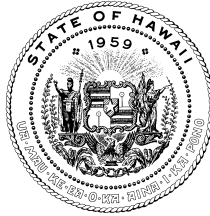


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STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

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August 21, 2012

Chris Monahan, Ph.D.  
Cultural Surveys Hawaii  
PO Box 1114  
Kailua, Hawaii 96734

LOG NO: 2012.1443  
DOC NO: 1208MV01

Subject: **Chapter 6E-8 & National Historic Preservation Act Section 106 Review -  
Archaeological Inventory Survey, Proposed Queen Ka'ahumanu Highway Widening, Phase 2  
Kalaoa, O'oma, Kohanaiki, Kaloko, Honokohau 1-2 and Kealakehe Ahupua'a  
North Kona District, Island of Hawai'i  
TMK: (3) 7-4-008, 7-3-009 & 7-3-043 (portion)**

Thank you for submitting the report titled *Archaeological Inventory Survey for the Proposed Queen Ka'ahumanu Highway Widening Phase 2 Project Kalaoa, O'oma, Kohanaiki, Kaloko, Honokohau 1-2 and Kealakehe Ahupua'a, North Kona District, Island of Hawai'i TMK: (3) 7-4-008, 7-3-009 & 7-3-043* (C. Monahan, T. Yucha, and C. O'Hare), July 2012. This report was received by our office on July 20, 2012. The report presents the findings of multiple phases of archaeological survey work conducted along a 5.2 mile section of the proposed Queen Ka'ahumanu Highway Widening Project, Phase II. A previous draft of this archaeological inventory survey (AIS) report was reviewed by SHPD (*Log 2011.1140 Doc 1104TD12*). This previous draft was accepted under the condition that comments and concerns from other consulting parties, including the National Park Service (NPS) and native Hawaiian organizations (NHO), would be addressed. Because the concerns of the consulting parties were not adequately addressed, additional field work was undertaken in the project area and a revised draft report was submitted to our office for review. The results of all the field work in this project area to date are presented in this revised report. The survey identifies 75 historic properties in the proposed project area; twenty of the historic properties are previously described in existing archaeological reports. The remaining 55 historic properties are newly identified in this report. Of the 55 newly identified historic properties, 35 were recorded in the initial draft of this report (Monahan et. al. 2011), and the remaining 20 historic properties were recorded during the supplemental fieldwork involving consulting parties (NHO's NPS, and SHPD).

The changes that were made to this report are the result of the SHPD review of a previous draft (*Log 2012.1443, Doc. 1206MV26*). We believe the revisions and explanations have adequately addressed our concerns relating to inadequate levels of recording at multiple sites, the assessment of site functions, and treatment recommendations. We are pleased that the 'Big Cave' site (50-10-28-29725) has been identified and recoded in this AIS, and we are pleased that the FHWA will proceed with the proposed mitigation commitment of creating a Burial Treatment Plan to be presented to the Hawaii Island Burial Council, in consultation with the appropriate land owner.

All 75 historic properties identified during this survey are assessed as significant under the National Register of Historic places (NRHP) criterion D for their ability to yield information on historic and prehistory. As a result of consultation with Native Hawaiian organizations (NHOs), Criterion "e" of the Hawaii Register of Historic Places (HRHP) has been added to all 75 sites, because the NHOs believe these properties are of cultural value to the Native Hawaiian people. In addition, Sites 19954, 28774, 22507, 22418, 19953, 28782, 28784, 28787, 19952, 15324, 19946, 28791, and 29272 are assessed as significant under NRHP criteria C and D; and HRHP Criterion "e". Two trails, (Sites 18099 and 10714) are assessed as significant under NRHP criteria A, C, and D; and HRHP Criterion "e". Finally, the Mamalahoa Trail (Site 00002) is assessed as significant under NRHP criteria A, B, C, and D; and HRHP Criterion "e". We concur with the significance assessments presented in this report for all sites assessed as significant under NRHP criteria A, B, C, and D.

Dr. Monahan  
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The application of HRHP significance Criterion "e" to all sites has been reviewed by the SHPD History and Culture Branch. The results of that review are as follows:

The History and Culture Branch concurs with the Archaeological Inventory Survey that all 75 historic properties in the project area be assessed as significant under Criterion E, as having important value to the *native Hawaiian people...due to associations with cultural practices once carried out, or still carried out, at the property*, or due to associations with traditional beliefs, events, or oral history accounts-these associations being important to the group's *history and cultural identity*. Due to changes in Hawai'i that occurred subsequent to contact with the western world (1778), the unique cultural identity of the native Hawaiian people progressively eroded. Thus with respect to that cultural identity, aside from personal DNA that each native Hawaiian possesses, all that is left today are those physical manifestations (archaeological sites and features) that identifies and defines the native Hawaiian culture. From a cultural perspective then, all sites and features are significant to the native Hawaiian.

The History and Culture Branch also concurs with the project effect and mitigation recommendations as discussed in Section 7, as well as summarized in Table 27 (Summary of Proposed Mitigation) and Table 28 (Project Effect and Mitigation Recommendations for Historic Properties in the Project Areas). The Branch would also like emphasize the importance of care and sensitivity as it relates to the proposed data recovery at those sites identified as possible burials.

This report meets the requirements of HAR §13-276 and *Secretary of the Interior's Standards for Documentation and Evaluation*, and is accepted by SHPD. Please send one hardcopy of the document, clearly marked **FINAL**, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office.

Please contact Mike Vitousek at (808) 652-1510 or [Michael.Vitousek@Hawaii.gov](mailto:Michael.Vitousek@Hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,



Theresa K. Donham  
Deputy State Historic Preservation Officer  
Archaeology Branch Chief  
Historic Preservation Division

cc: Hinano Rodrigues, Acting Branch Chief  
History and Culture Branch  
Historic Preservation Division