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DEPARTMENT OF LAND AND NATURAL RESOURCES

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February 07, 2012

Lyle Hirota, Deputy Division Chief
Wastewater Division
Department of Environmental Management
108 Railroad Avenue
Hilo, Hawaii 96720

LOG NO: 2012.0292
DOC NO: 1202TD03
Archaeology

Dear Mr. Hirota:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act Section 106 Consultation – Ethnohistoric Research, Proposed Nā‘ālehu Waste Water Treatment Plant Kaunamano Ahupua‘a, Ka‘ū District, Island of Hawai‘i
TMK: (3) 9-5-012: 002 and 005 (por.)**

This is in response to a request for comments on a letter report prepared by Pacific Legacy (Reeve, January 2012) regarding the subject 51-acre project area, which is being considered as the location for a County of Hawai‘i waste water facility. The facility will be partially funded by the Environmental Protection Agency (EPA), triggering Section 106 consultation. The report was prepared for Fukunaga and Associates and the County of Hawai‘i, and is based on background research conducted in preparation for an archaeological inventory survey. We received a copy of this report on January 23, 2012.

The report indicates that the proposed project area is situated at a place known historically as Kahua Olohu, a traditional gaming field and Makahiki grounds. The place name appears on USGS quadrangle maps dating 1962 and 1981; and its location is specifically identified by Mary Kawena Pukui, whose grandmother lived directly upslope from the site (Handy et al. 1972). Reeves (2012:3) notes that although several Makahiki grounds existed in Hawai‘i, the actual locations of very few are known today. These places are directly linked to an important religious event in the Hawaiian calendar and were also the sites of rituals and ceremonies associated with the Makahiki games. In addition, this particular site is described in sources as being a famous bowling (*‘ulu maika*) and *paha* field. An estimated extent for this site is presented in Reeves’ report (Figure 6); existing topographic contours show a distinctive flat area in the otherwise sloping terrain. The site encompasses approximately 38 acres, 24 of which are within the State-owned parcel 002.

We concur with the assessment that this site is significant under National Register criteria (a), (c), (d); and State of Hawaii significance criterion (e). Further research could potentially indicate significance under National Register criterion (b) as well. The site has been listed in the State Inventory of Historic Places (Site 50-10-74-29231), and is eligible for inclusion in the State and National Registers. The most suitable mitigation measure for historic properties and traditional cultural properties significant under multiple criteria is to avoid the site and take measures to ensure preservation and protection of the site. We concur with the recommendation that the project area be relocated to ensure there are no direct or indirect impacts to Kahua Olohu. We are willing to work with DLNR Land Division and the adjacent landowner of parcel 005 to pursue State and National Register nomination of this significant cultural property. Thank you for considering an alternative location for this project.

Aloha,

A handwritten signature in black ink, appearing to read "Theresa K. Donham".

Theresa K. Donham
Deputy State Historic Preservation Officer
State Historic Preservation Division

cc: Wynn Miyamoto (via email)
Gordon Heit (via email)
Rowland Reeve (via email)