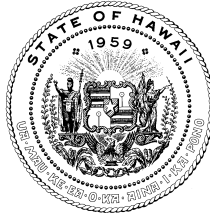


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**HISTORIC PRESERVATION DIVISION
DEPARTMENT OF LAND AND NATURAL RESOURCES**

601 Kamokila Boulevard, Suite 555
Kapolei, HI 96806

October 4, 2013

Mr. Lance Fukumoto
Fukunaga and Associates, Inc.
1357 Kapi'olani Blvd. Suite 1530
Honolulu, Hawai'i 96814

LOG NO: 2013.4982
DOC NO: 1309SN14
Archaeology

Dear Mr. Fukumoto:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act (NHPA) Section 106 Review –
Pre-Consultation for Environmental Assessment Preparation
Nā'ālehu Wastewater Transmission, Treatment and Disposal System
Kaunamamo Ahupua'a, Ka'u District, Island of Hawai'i
TMK: (3) 9-5-012:002**

Thank you for the opportunity to comment on this notice that was received by our office on August 23, 2013. According to the submittal, you are preparing a draft environmental assessment (DEA) for a proposed wastewater treatment and disposal facility and transmission line, to be located on State land east of Nā'ālehu. The project is being undertaken by County of Hawai'i Department of Environmental Management and will be partially funded and permitted by the Environmental Protection Agency (EPA). It is therefore a federal undertaking and subject to historic preservation review pursuant to Section 106 of the NHPA in addition to the requirements of the National Environmental Policy Act (NEPA).

Our office previously reviewed the results of ethnohistoric research in connection with the archaeological inventory survey of proposed project alternative locations (Reeves 2012). During this research, Kahua Olohu, a traditional gaming field and Makahiki grounds was identified within a 38-acre portion of the 152-acre State-owned Parcel 002. The site is listed in the State Inventory of Historic Places (Site 50-10-74-29231) and determined eligible for the National and State Registers under multiple criteria. In a letter to the Hawai'i County Department of Environmental Management, SHPD recommended that the proposed project be relocated to ensure there are no direct or indirect impacts to Kahua Olohu (letter to L. Hirota February 7, 2012; Log 2012.0292, Doc 1202TD03).

Additional historic properties were subsequently identified during an inventory survey of two alternative project sites within Parcel 002. Five historic properties were identified in the 8.7-acre eastern alternative site, and three historic properties were identified within the 8.4-acre western alternative site. Additional historic properties (17) were identified during reconnaissance survey of areas near the two alternative project sites. SHPD approved the report of findings and concurred with the recommendation that two historic properties identified within the eastern project alternative (a lava tube with an identified burial and the Na'ālehu to Honu'apo Railroad) and one site within the western alternative (petroglyphs) be preserved (Letter to Paul Cleghorn dated January 14, 2013; Log 2012.2655, Doc 1211SN10).

We understand that the selected project area has been located so that identified sites, including Kahua Olohu are physically avoided. However, we are concerned about potential indirect effects to these sites, including changes to the character and use of the sites due to the presence of the wastewater treatment facility. This type of facility has the potential to introduce atmospheric, visual and/or audible elements that could adversely affect the character and uses of historic properties and the surrounding cultural landscape. In addition, expansion of this facility may occur with the passage of time. Please address the indirect effects of the project on nearby historic properties in the DEA and indicate how these effects will be mitigated. If expansion occurs in the future, is there sufficient space to avoid direct and indirect effects to the nearby historic properties? We also request that you address the potential for the displaced wastewater to affect the numerous sites that are downslope of the proposed facility location. Please provide a detailed description of the undertaking in the DEA so that an area of potential effects (APE) can be clearly identified.

We recommend that consultation with the community and Native Hawaiian Organizations (NHO) pursuant to 36 CFR 800 take place as soon as possible. For purposes of NHPA Section 106 compliance, the EPA or its designated representative should initiate the consultation process in conjunction with NEPA compliance and the Hawaii Chapter 343 process (36 CFR 800.3(b)). An assessment of project effects as determined in consultation with all interested parties should be included in the DEA, as well as proposed steps to resolve any adverse effects. We request that a copy of the DEA be forwarded to our office for review and comment. As noted above, we recommend that the proposed project be located to ensure there are no direct or indirect impacts to Kahua Olohu and other identified historic properties. Please contact Sean Nāleimaile at (808) 933-7651 or Sean.P.Naleimaile@Hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,

A handwritten signature in black ink, appearing to read 'Theresa K. Donham', with a horizontal line extending to the right.

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