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KAUA'I HISTORIC PRESERVATION REVIEW COMMISSION

GERALD IDA, CHAIR SUSAN REMOALDO, VICE CHAIR LEE GATELY, MEMBER
KATHLEEN KIKUCHI-SAMONTE, MEMBER
CAROLYN LARSON, MEMBER
STEPHEN LONG, MEMBER
SANDI QUINSAAT, MEMBER
AUBREY SUMMERS, MEMBER
VICTORIA WICHMAN, MEMBER

Pursuant to Hawai'i Revised Statutes Section 92-3.7, which codified Act 220, SLH 2021, the meetings of the County of Kaua'i Historic Preservation Review Commission will be conducted as follows:

• The meeting location that will be open to the public is:

23 NOV -7 P3:29

Līhu'e Civic Center, Moikeha Building Meeting Room 2A-2B 4444 Rice Street, Līhu'e, Kaua'i, Hawai'i

- Written testimony indicating your 1) name or pseudonym, and if applicable, your position/title and organization you are representing, and 2) the agenda item that you are providing comment on, may be submitted on any agenda item in writing to planningdepartment@kauai.gov or mailed to the County of Kaua'i Planning Department, 4444 Rice Street, Suite A473, Līhu'e, Hawai'i 96766. Written testimony received by the Planning Department at least 24 hours prior to the meeting will be posted as testimony to the Kaua'i Historic Preservation Review Commission's website prior to the meeting (https://www.kauai.gov/Government/Boards-and-Commissions/Historic-Preservation-Commission). Any testimony received after this time will be retained as part of the record, but we cannot assure the Commission will receive it with sufficient time for review prior to the meeting.
- Oral testimony will be taken on specific agenda items, at the public meeting location indicated on the meeting agenda.
- IF YOU NEED AN AUXILIARY AID/SERVICE, OTHER ACCOMMODATION DUE TO A DISABILITY, OR AN INTERPRETER FOR NON-ENGLISH SPEAKING PERSONS, PLEASE CONTACT THE OFFICE OF BOARDS & COMMISSIONS AT (808) 241-4917 OR adavis@kauai.gov As soon as possible. REQUESTS MADE AS EARLY AS POSSIBLE WILL ALLOW ADEQUATE TIME TO FULFILL YOUR REQUEST. UPON REQUEST, THIS NOTICE IS AVAILABLE IN ALTERNATE FORMATS SUCH AS LARGE PRINT, BRAILLE, OR ELECTRONIC COPY.

KAUA'I HISTORIC PRESERVATION REVIEW COMMISSION MEETING NOTICE AND AGENDA

Thursday, November 16, 2023 1:30 p.m. or shortly thereafter Līhu'e Civic Center, Moikeha Building Meeting Room 2A-2B 4444 Rice Street, Līhu'e, Kaua'i, Hawai'i

Mary Sann

- A. CALL TO ORDER BY CHAIR
- B. ROLL CALL
- C. APPROVAL OF AGENDA
- D. APPROVAL OF THE MINUTES
 - 1. October 19, 2023
- E. GENERAL BUSINESS
- F. COMMUNICATIONS
- G. UNFINISHED BUSINESS
- H. NEW BUSINESS
 - 1. County of Kaua'i Housing Agency
 Uahi Ridge Affordable Rental Housing Project- Phase I

Tax Map Key: (4) 3-8-005:022:0002

Līhu'e, Hawai'i

National Historic Preservation Act, Section 106: Consultation with Native Hawaiian Organizations and Potential Consulting Parties.

- a. Director's Report pertaining to this matter.
- 2. Gay & Robinson, Inc.

Kaumakani Avenue

Proposed demolition and the proposed reconstruction of a single-family residence (House #411)

Tax Map Key: (4) 1-7-006:001

Kaumakani, Hawai'i

Consideration of a zoning permit for the proposed demolition and the proposed reconstruction of an existing single-family residence located within Kaumakani Avenue.

a. Director's Report pertaining to this matter.

3. Alexander & Baldwin

Removal of McBryde Sugar Company Camp 9 (Numila Plantation Camp)

Tax Map Key: (4) 2-2-001:001

'Ele'ele, Hawai'i

Consideration of zoning permits for the proposed demolition and the proposed relocation of existing dwellings and existing accessory structures located within the former McBryde Sugar Company Camp 9 (Numila Camp).

4. All Saints' Episcopal Church

Proposed Lanai Addition to the Church Building

Property Address: 4-1061 Kūhiō Highway

Tax Map Key: (4) 4-5-004:018

Kapa'a, Hawai'i

Consideration of a zoning permit to construct a proposed lanal addition to an existing historic church.

a. Director's Report pertaining to this matter.

I. EXECUTIVE SESSION:

Pursuant to Hawai'i Revised Statutes Sections 92-4 and 92-5(a)(4), the purpose of this executive session is to consult with the County's legal counsel on questions, issues, status and procedural matters. This consultation involves consideration of the powers, duties, privileges, immunities, and/or liabilities of the Commission and the County as they relate to the following matters:

1. County of Kaua'i Housing Agency

Uahi Ridge Affordable Rental Housing Project- Phase I

Tax Map Key: (4) 3-8-005:022:0002

Līhu'e, Hawai'i

National Historic Preservation Act, Section 106: Consultation with Native Hawaiian Organizations and Potential Consulting Parties.

a. Director's Report pertaining to this matter.

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Consideration of a zoning permit to construct a proposed lanai addition to an existing historic church.

a. Director's Report pertaining to this matter.

J. ANNOUNCEMENTS

Historic Hawai'i Foundation Virtual Training Seminar via Zoom

Topic: Historic Tax Credits Seminar Date: Tuesday, December 5, 2023

Time: 9:00am-Noon

K. SELECTION OF NEXT MEETING DATE AND AGENDA TOPICS (January 18, 2024)

L. ADJOURNMENT

DRAFT To Be Approved

COUNTY OF KAUA'I Minutes of Meeting OPEN SESSION

Board/Cor	nmission:	Kaua'i Historic Preservation Review Commission	Meeting Date	October 19, 2	023
Location	Moʻikeha Med	eting Room 2A/2B	Start of Meeting	g: 1:30 p.m.	End of Meeting: 4:24 p.m.
Present	Larson, Stepho Deputy Count Secretary Duk	da. Vice Chair Susan Remoaldo. Commissioners: en Long, Sandra Quinsaat, Aubrey Summers, and Vi y Attorney Stephen Hall. Planning Department Staff: e Nakamatsu and Program Manager Myles Hironaka upport Clerk Sandra Muragin.	ctoria Wichman. Deputy Director J	odi Higuchi Sayegusa, Planner Marisa Valenciano,	
Excused					
Absent					
SUBJE	CT	DISCUSSION			ACTION
A. Call To Order	Chair I	da called the meeting to order at 1:30 p.m.			
B. Roll Ca	Comm Comm Comm Comm Comm Comm Vice C Chair I	Director Jodi Higuchi Sayegusa verified attendance issioner Gately replied present. issioner Kikuchi-Samonte arrived at 1:33 p.m. issioner Larson replied here. issioner Long replied here. issioner Quinsaat replied here. issioner Summers replied present. issioner Wichman replied present. hair Remoaldo replied here. da replied here.	by roll call;		Quorum was established with eight commissioners present.
C. Approv					Ms. Wichman moved to approve the October 19, 2023, agenda. Ms. Summers seconded the motion. Motion carried 8:0.

SUBJECT	DISCUSSION	ACTION
D. Approval of	Commissioner Kikuchi-Samonte arrived at 1:33 p.m.	
the Minutes		
	a. November 17, 2022 Meeting Summary	Ms. Larson moved to approve
		the November 17, 2022;
		minutes as circulated. Vice Chair Remoaldo seconded the
		motion. Motion carried 9:0.
		motion. Wotton carried 9.0.
	b. February 16, 2023 Meeting Summary	Ms. Larson moved to approve
	J in the second	the February 16, 2023; minutes
		as circulated. Ms. Summers
		seconded the motion.
	Vice Chair Remoaldo requested the following corrections;	(motion died no vote)
	1. Page 4, last paragraph, first sentence, change "reuse" or "repurpose" to "reused" or "repurposed".	
	 2. Page 6, fourth paragraph, first sentence, questioned if "human burial" was single or multiple. And if it was single "a" should be inserted between "2022" and "post-contact". Second sentence "was aware there were previous burials and interment" if there were multiple burials it should be changed to "there were previous burials and interments" or "was aware of a previous burial and interment". Support clerk to research and correct. *After a review of the recordings it was determined to be a single burial, change "2002 post-contact" to "2022 a post-contact" and "was aware that there were previous burials and interment" to "was aware of a previous burial and reinterment". 3. Page 6, fifth paragraph, second sentence, questioned if there was a single burial or multiple burials, "confirm the site of the previous burial and their interment". Support clerk to research and correct. *After a review of the recordings it was determined to be a single burial "confirm the site of the previous burial and reinterment". 	
	4. Page 7, first paragraph, second sentence, change "differ" to "defer".5. Page 7, third paragraph, second sentence, eliminate "that" after textures and change "Standard" to "Standards".	
	6. Page 7, fourth paragraph, first sentence, change "levy" to "levee".	

SUBJECT	DISCUSSION	ACTION
	7. Page 10, first paragraph, fourth sentence, "The letter of intent deadline is due February", should there be a date and year. Support clerk to research and correct. *After reviewing the recordings, it was determined no date or year was given, no changes were made to the minutes.	
	 Ms. Larson requested the following corrections; 1. Page 3, third paragraph, last sentence, change "Historic Kaua'i Foundation" to Historic Hawai'i Foundation. 2. Page 3, fourth paragraph, change "HKF" to "HHF". 3. Page 5, "Ms. Valenciano asked for clarification and for the record that the approved motion is the recommendation as amended by the Department", no action listed needs to be clarified. Support clerk to research and correct. *After review of the recording added "to include the recommendations from HHF". "Ms. Valenciano asked for clarification and for the record that the approved motion is the recommendation as amended by the Department to include the recommendations from HHF" 4. Page 6, fourth paragraph, second sentence, change "there were previous burials and interment" to "there were previous burials and reinterments". 	Ms. Larson moved to approve the February 16, 2023, minutes with the following amendments; page 3 change "Historic Kaua'i Foundation" to Historic Hawai'i Foundation, page 3 change "HKF" to "HHF", page 4 change "reuse" or "repurpose" to "reused" or repurposed", page 5 add "to include the recommendations from HHF", page 6 change "2002 post-contact" to "2022 a post-contact", page 6 change "was

SUBJECT	DISCUSSION	ACTION
		aware that there were previous
		burials and interment" to "was
		aware of a previous burial and
		interment", page 6 change
		"there were previous burials and interment" to "there were
		previous burials and
		reinterments". Vice Chair
		Remoaldo seconded the
		motion. Motion carried 9:0.
	c. August 17, 2023 Meeting Summary	Ms. Larson moved to approve
	or riagast 17, 2025 Protoing Summary	the August 17, 2023; minutes
		as circulated. Ms. Summers
		seconded the motion.
	W' CL' B 11 (14 CH)	(motion died no vote)
	Vice Chair Remoaldo requested the following corrections; 1. Page 2, number 5, change "was" to "were".	
	2. Page 7, six bullet, change "space there unused" to "space there was unused".	
	2.1 age 7, six buriet, change space there unused to space there was unused.	
	Ms. Larson requested page 2, second paragraph, first sentence to change "Otsuka" to "Sueoka".	
	Support clerk to research and correct. *After review of the recording, it was verified that Ms.	
	Larson said "Otsuka", no changes were made to the minutes.	Ms. Larson moved to approve
		the August 17, 2023, minutes
		with the following amendments; page 2 change
		"was" to "were" and page 7
		change "space there unused" to
		"space there was unused".
		Vice Chair Remoaldo
		seconded the motion. Motion
		carried 9:0.

SUBJECT	DISCUSSION	ACTION
E. General	No general business.	
Business		
F.	Ms. Higuchi Sayegusa referenced eleven written public testimonies (documents on file) received	
Communications	by the Planning Department as of October 18, 2023, for The Makai Golf Course at Princeville.	
	The commission received a copy of the testimonies when they arrived at the meeting and was	
	allowed time to review each one.	
	Chair Ida called for a recess at 1:45 p.m.	
	Chair Ida reconvened the meeting at 1:55 p.m.	
G. Unfinished	No unfinished business.	
Business		
H. New Business	1. Nomination to the State Historic Register	
	The Makai Golf Course at Princeville	
	Property Address: 4080 Lei O Papa Road	
	Tax Map Keys: (4) 5-4-005:022; (4) 5-4-005:049; (4) 5-4-005:054; (4) 5-4-006:003; (4) 5-4-	
	006:005; (4) 5-4-006:006; (4) 5-4-012:001; (4) 5-4-012:006	
	Princeville, Hawai'i	
	Consideration of a historic property for nomination to the State Register of Historic Places.	
	a. Director's Report pertaining to this matter.	
	Ms. Higuchi Sayegusa invited the first registered testifier to the microphone:	
	Robert Pollock testified he had a home in Princeville and supported the nomination to the State	
	Register of Historic Places. He highlighted Mr. Robert Trent Jones, Jr. course design that	
	diverted excess rainwater so it would not flood the course or surrounding areas. The design	
	included specific trees strategically planted along the course, roadways, sewage plans,	
	underground powerline plans all developed to work together to soak up the water like a sponge	
	and divert excess rainwater. He said for 50 years it worked and functioned through two	
	hurricanes and countless storms. Mr. Pollock said the design team had three considerations;	
	effective water control, protection of the natural habit and beauty and preservation of the view	

SUBJECT	DISCUSSION	ACTION
	corridors. He stated it was critical for the golf course to remain a golf course in order to prevent flooding from destroying the north shore, coastline, and Princeville development. Mr. Pollock said Starwood planned to build condominiums along Kahaku Drive that would eliminate the golf course and its open space. These open spaces provided a natural habitat for wildlife and prevented overdevelopment. Mr. Pollock shared that he had Parkinson's disease and used to walk along the woods course that was closed for several years which affected his health.	
	Robert Beaty testified in support of the nomination to the State Register of Historic Places. He has lived on Kaua'i for eight years and visited Kaua'i for thirty years and agreed with Mr. Pollock's testimony. He was the primary caretaker of Mr. Robert Trent Jones Hanalei home and had witnessed the diversion of flood waters and would like the golf course to remain a golf course.	
	Fran White testified in support of the nomination to the State Register of Historic Places. She said it's a prime example of thoughtful forward-thinking development despite it being designed over 50 years ago. Mr. Robert Trent Jones Jr. was hired to develop 27 acres into a golf course that would preserve the beauty of the land to work with its natural environment, control flooding, and protect and allow wildlife to thrive. She highlighted the natural channels that diverted the water to Hanalei River that eventually fed into the ocean. Ms. White said the golf course was watered using the lakes that held partially treated effluent from the north shore sewage treatment plant. She said preservation of the course and its availability to the community was critical to Kaua'i and Hawai'i. Placing it on the State Register of Historic Places would honor Mr. Jones and the people of Kaua'i.	
	With no other testifiers in the audience, Ms. Higuchi Sayegusa displayed on the whiteboard a Registration Procedure Chart and explained how a nomination was processed once it's submitted to the State Register of Historic Places.	
	Mr. Gately asked if property owners had any advantages to being on the State Register of Historic Places. Ms. Higuchi Sayegusa replied there were Federal Preservation Grants to rehabilitate the property and Federal tax credits. It also came with County tax credits and State grants and technical assistance on how to rehabilitate and maintain a historic property.	

SUBJECT	DISCUSSION	ACTION
	Mr. Gately asked if businesses also benefited from Federal, State and County credits and grants and if designated historic were they required to comply with public accessibility requirements. Ms. Higuchi Sayegusa replied if they receive County tax benefits, they would be required to periodically allow public accessibility to the property. Ms. Valenciano added that the County tax benefit would only apply to residential property.	
	 Planner Marisa Valenciano summarized the Director's Report dated October 19, 2023; The commission's action for the project was to; Support for the nomination; or Opposition to the nomination; or Deferred action on the nomination; or Receive for the record with no comment. KHPRC was an advisory to the Hawai'i Historic Places Review Board which would determine the eligibility of this nomination at their November 17, meeting. The commission's final action would be transmitted in time for their meeting next month. There was no department recommendation. 	
	 Petitioner Don Hibbard completed the nomination on behalf of The Albatross Alliance organization. He described the historic and physical appearance and condition of the property with a power point presentation displaying 78 of 133 slides. Highlights included; Nominated at the state level under Criterion C for its design and work by a master Robert Trent Jones Jr. Significant at the local level under Criterion A for its association with the history of golf and association with the first planned community on Kaua'i, Princeville at Hanalei. Showed the layout of the golf course. Displayed numerous slides of the various views and landscaped course. Pointed out the numerous diversions and drainage of waterways to the lakes. In 1917 there was an anthrax epidemic, and 500 animals were killed and buried in shallow graves on the woods course next to oak trees that marked the location of the burial site. 	

SUBJECT	DISCUSSION	ACTION
	 Japanese Zen garden in the middle of a bunker. The course was built in 1971, however, the holes were in the same order, and the route was the same. 	
	 New grass replaced the original, added golf tees, and changed some of the bunkers. The woods have not been maintained since 2018. 	
	The integrity of location and visual effects had been preserved.	
	Questions:	
	 Chair Ida asked Mr. Hibbard if he was aware of any cemeteries on the course. Mr. Hibbard replied he was not, and the property was previously pastureland. Mr. Long added there was a cemetery on the golf course. Someone from the audience shouted it was the Prince course. Ms. Higuchi Sayegusa suggested the commission clarify with the landowner. 	
	 Ms. Larson asked how long the property was used as a ranch. Mr. Hibbard replied the Wilcox family turned it into a ranch from the 1890's. Amfac (American Factors) purchased the property mainly for the water around 1915 or 1916 but kept the ranch. Mr. Long asked if the application included all three nine holes. Mr. Hibbard replied yes. 	
	 Mr. Long asked if there was another golf course in Princeville. Mr. Hibbard replied the Prince course which was also designed by Robert Trent Jones Jr. in the late 1980's. Vice Chair Remoaldo asked if there was any historical remnants of a path, ditch, or wall. Mr. Hibbard replied he wasn't aware of any. She remembered in her youth 	
	eucalyptus trees lined up like Maluhia Road tunnel of trees. Mr. Hibbard noted there were eucalyptus trees along the course.	
	 Ms. Larson asked if there were any other historic golf courses in Hawai'i. Mr. Hibbard replied the Hamakua course that was recently registered in August. Ms. Summers asked Ms. Larson if she meant historic over fifty years old or on the historic register. Ms. Larson said she meant historic register. 	
	 Ms. Larson asked if Kaua'i's two older courses were on the inventory list of historic places. Ms. Higuchi Sayegusa replied no. Ms. Larson asked if there was a marker at the anthrax site. Mr. Hibbard replied no. 	

SUBJECT	DISCUSSION	ACTION
	Ms. Larson asked if there was any history about the ranch on the course. Mr. Hibbard replied the owners could answer that. Mr. Hibbard and Mr. Hibbard and Mr. Hibbard answer that.	
	• Ms. Larson asked if Princeville was Kaua'i's largest planned (<i>she did not finish her sentence</i>). Ms. Higuchi Sayegusa replied she wasn't sure of the largest, but it was the first.	
	• Ms. Larson asked if there was a map of the groves. Mr. Hibbard asked if she was talking about the plants. Ms. Larson replied yes. Mr. Hibbard replied he was not aware of any, but Mr. Trent Jones may have one.	
	Attorney Ian Jung on behalf of SOF-XI Kaua'i PV Golf, L.P. landowner of the eight parcels in the petition and Jason Cruce owner's representative who filed the affidavit in opposition to the proposed petition testified.	
	Mr. Jung apologized for not preparing a presentation. He said Mr. Hibbard and The Albatross Alliance organization from Nevada did not properly inform the landowner of the application to the State Historic Register nor did they solicit any information from them. He stated this was the first non-owner applicant and was aware that the Hawai'i Historic Places Review Board took precedence to not accept non-owner petitions due to contested case, land use rights and dealing with impacts to landowners in the future.	
	 Mr. Jung highlighted the following reasons for the application: The landowner previously proposed glamping on one of the wood courses but it was withdrawn based on a council ordinance that prohibited glamping in the open district. The area was designated an open district where 10% land coverage was enforced through the county's zoning code for areas subject to drainage issues. Any projects in the future would not affect the water diversion and drainage or wildlife habitat. The area contained no archaeological site to maintain or preserve nor did it contain any need for historic preservation. 	
	Mr. Jung reminded the commission that the Hawai'i Historic Places Review Board valued the commissions comments, and all statements would be recorded. Once it is filed with the Hawai'i	

SUBJECT	DISCUSSION	ACTION
	Historic Places Review Board it would go through a contested case hearings officer and then appeals. Mr. Jung stated they opposed this petition on the grounds of no-good faith. He said the golf course dedication would expire February 2026 and that was the reason for the petition. The property was under a county zoning code that would allow limited right of density with a preservation of open space because of the 10% land coverage constraint. They opposed the petition and would formally file a request for a contested case.	
	Jason Cruce said the property was beautiful because of the ocean side holes, mountains and the bay around it but the course was mediocre. He said it was a resort course that was fun to play, an amenity for the homeowners and hotel guests as well as the Cliffs and Westin but it was not a premier golf destination as proven by the fact that it hosted only two professional tournaments in its 50-years. Mr. Cruce said the property did not contain any historic artifacts or associated with any significant person(s) nor did it embody any distinct characteristics of golf. He said none of the plants or fauna were indigenous to Hawai'i. The course had not yielded and was unlikely to generate anything of historic significance. Finally, the statement that the hydrology of the course served the community was false. While the lakes did hold the effluent for the sewage treatment, the course managed its own water with swales that drained into the community.	
	 Questions: 1. Ms. Summers said with the 10% lot coverage they could build a small home on private land that would not be publicly accessible. Mr. Jung said public accessibility was designated from the county's real property tax for the historic designation. Mr. Jung and Mr. Cruce explained that the course and roads were private and not open to the public. 2. Ms. Larson asked for an explanation of the 10% lot coverage. Mr. Jung replied a lot of the testimony and discussion talked about the preservation of open space and preserving the diversion of water. He said the open district preserved open space by development guidelines that allowed projects in the open district. The land coverage in open district was limited to 10% of permeable surface, so the entire property was subject to only 10% of impermeable materials. They could build up to 10%. 3. Ms. Larson asked what was the current use of the woods nine. Mr. Cruce replied it was just open space and not used. He said there wasn't a demand to operate 27-holes of golf course. It took time and money to maintain the course for golf. 	

SUBJECT	DISCUSSION	ACTION
	4. Ms. Larson asked if that was a Kaua'i trend that there weren't many golfers. Mr. Cruce	
	replied the popularity of golf had diminished. Between Hokuala, Kukui'ula, Wailua,	
	Prince course, Princeville course there was not enough demand on this island to support the	
	number of holes that existed.	
	5. Ms. Larson asked if there was a projection of where that demand would go in the future.	
	Mr. Cruce did have an answer.	
	6. Ms. Summers stated in 2026 they could build out the entire golf course if they wanted to.	
	Mr. Cruce replied he could build any number of uses today.	
	7. Ms. Summers stated even though it's been dedicated. Mr. Cruce replied that the dedication	
	limits it to golf or ancillary use. The property was used for golf, sunset tours, and yoga.	
	After 2026 open zoning would change from agriculture use to single family residences.	
	Mr. Jung added that the density would be limited in the open district, so the county zoning	
	allowed one house for the first three acres, then one house per one acre subject to 10%	
	slope constraint. The golf designation expired February 2026, because of a 1980's Federal tax program. He said the base yard lot could be used for affordable housing.	
	8. Ms. Summers stated the base yard had a different zoning and could become affordable	
	housing because the density was higher. Mr. Jung replied with the zoning code they could	
	get a project development use permit and get higher density if there's a housing agreement	
	to build affordable housing.	
	9. Mr. Gately stated they could build 10% mansion space and do the entire golf course with	
	mansions. He appreciated their explanation but added they should be talking about the	
	historic aspect of the golf course. He couldn't understand how this course could be	
	historically significant in comparison to Wailua golf course which would fit the historic	
	significance better than this golf course. He asked if there was worker housing near the	
	Hanalei Planation road. Mr. Cruce replied the Princeville Shops and Foodland now	
	occupied the area where the worker housing and ranch headquarters used to be.	
	10. Mr. Gately asked if the golf course was registered historical would that limit their	
	development plans. Mr. Cruce replied it would depend on the mitigation plan of what	
	was deemed historical. Ms. Higuchi Sayegusa said at the National level if a property	
	owner objects it could not be listed under the national register; however, at the State	
	level they accept non-owner applications, but it would go through a contested case	
	process.	

SUBJECT	DISCUSSION	ACTION
	11. Ms. Larson asked when Princeville was developed, they built worker housing and wanted to know if it still existed. Mr. Cruce replied it assimilated into regular real estate housing.	
	Tom Freestone testified that the workforce housing was Hale Honu units that was on Hanalei Plantation Road that were eventually privately turned over and sold and was no longer workforce housing.	
	Chair Ida stated he appreciated everyone's testimony on the golf course and doubts the Hawai'i Historic Places Review Board would consider the application. He said the golf course had no historic value and would advocate to receive the application with no comment. He did not want to be a part of a potential conflict between the community and golf course and did not want to set precedence on this application.	
	Mr. Wichman, Vice Chair Remoaldo and Ms. Kikuchi-Samonte agreed with Chair Ida. Ms. Larson said parts of the application have merit and that was enough for her to support the nomination but realized majority of the commissioners agreed with Chair Ida. She decided to go with the majority.	Ms. Wichman moved to receive for the record with no comment the Nomination to the State Historic Register of The Makai Golf Course at Princeville, Property Address: 4080 Lei O Papa Road
		Tax Map Keys: (4) 5-4-005:022; (4) 5-4-005:049; (4) 5-4-005:054; (4) 5-4-006:003; (4) 5-4-006:005; (4) 5-4-006:006; (4) 5-4-012:001; (4) 5-4-012:006 Princeville, Hawai'i. Mr. Gately seconded the motion. Roll Call Vote:

SUBJECT	DISCUSSION	ACTION
		Mr. Gately – Yes
		Ms. Kikuchi-Samonte – Yes
		Ms. Larson – Yes
		Mr. Long – Recused/Abstained
		Ms. Quinsaat – Yes
		Ms. Summers – Yes
		Ms. Wichman – Yes
		Vice Chair Remoaldo – Yes
		Chair Ida – Yes
		Motion carried 8-Yes and
	Chain Ida and dean a massage at 2.47 a.m.	1-Abstain (Mr. Long)
	Chair Ida called for a recess at 3:47 p.m.	
	Chair Ida reconvened the meeting at 3:57 p.m. 2. Nomination to the State Historic Register	
	Matsumoto Residence	
	Property Address: 2257 Kuai Road	
	Tax Map Key: (4) 2-8-018:031	
	Poʻipū, Hawaii	
	Consideration of a historic property for nomination to the State Register of Historic Places.	
	a. Director's Report pertaining to this matter.	
	Ms. Higuchi Sayegusa said there was no one present in the audience to testify.	
	Planner Marisa Valenciano summarized the Director's Report dated October 19, 2023;	
	 The commission's action for the project was to; 	
	1. Support for the nomination; or	
	2.Opposition to the nomination; or	
	3.Deferred action on the nomination; or	
	4.Receival for the record with no comment.	

SUBJECT	DISCUSSION	ACTION
	The Planning Department recommended the commission support the nomination with recommendation to separately nominate the ahapua'a wall and other pre-contact features in proximity.	
	Petitioner Don Hibbard completed the nomination on behalf of the owners. Highlights included; • The roof was replaced after Hurricane Iniki. • Walls, windows, floors, everything inside was original. • A few jalousie windows were replaced with double hung windows. • The house had maintained its integrity.	
	 Questions: Ms. Larson asked about the front porch column that was shoved to one side and said it looked like it was added. Mr. Hibbard explained the right side was a battered column and the left side that Ms. Larson referred to was a pilaster. He said it was all original. Ms. Larson asked if the hardware would be included as part of the State Historic Register. Mr. Hibbard replied the nomination would include the whole house. Mr. Gately asked if they were just nominating the buildings for its historical structure not resident history. Mr. Hibbard replied yes for the buildings design. 	
	Ms. Valenciano clarified that the petitioner submitted an application and had the burden to prove that the property met the criteria's. The commission had the responsibility to assess and determine if it met or did not meet the criteria's.	
	• Mr. Gately had seen the home and was grateful that the owners wanted to preserve it. He wanted to clarify that their role in this process was just to assess the historic structure of the house. Mr. Hibbard said this was a vernacular home that had most of its original features.	
	• Mr. Gately asked if part of his decision should include the motive for the owners to want to be on the State Historic Register. Mr. Hibbard replied it should not be part of the decision, it should be based on the criteria. He said the owners want the tax exemption as well as preserving the property that was once their grandparents' home.	

• Ms. Wichman stated the property was next to the Kāneioluma complex and asked if the property had any archeological survey done. Mr. Hibbard replied no it did not, but the owners were warned not to disturb the ahapua'a rock wall. Ms. Wichman stated Henry Kekahuna's map of the Kāneioluma complex area showed the cultural landscape spread out to the other side of the rock wall. She said the area by the old YMCA building was food storage and preparation for the Ali'i and they may have also lived there. The whole area was part of the complex and it was more than just historic, it should fall into	
the archeological category. Mr. Hibbard replied that would not be a consideration for the State Historic Register. Vice Chair Remoaldo asked how much of the canec ceiling was damaged, removed and/or replaced. Mr. Hibbard replied the entire canec ceiling was replaced. Vice Chair Remoaldo asked if it was typical to have a girth inside and outside. Mr. Hibbard replied sometimes. He said most of the girths were in the interior hallway and living room partition walls of the home and the exterior walls had a single girth on the outside. Ms. Larson asked if this would be the first home to be on the register for Kaua'i. Mr. Hibbard replied the Wilcox house in Hanalei was on the register. Ms. Larson asked if this was a bungalow style home. Mr. Hibbard replied its definitely bungalow style with the battered columns and lava rocks on the front porch and the openness of the interior. Mr. Gately asked if this was the only south shore or west side home in Kaua'i's collection. He said there were seven others. One of each in Kīpū Kai, Kapa'a, and Kīlauea and the remaining four were in Hanalei. Ms. Valenciano replied she would check the State and National Register. Chair Ida asked if the picture with the ahapua'a wall was part of the Matsumoto property. Mr. Hibbard replied yes, it was. Chair Ida asked about the last picture that showed structures and chairs and asked if they were in the Kāneioluma complex. Hr. Hibbard replied yes, they were, and they were not on the Matsumoto property. Ms. Larson asked if the wall was included on the property. Mr. Hibbard replied yes.	

SUBJECT	DISCUSSION	ACTION
	replied the owners have not surveyed their property and was usure of where the	
	property line was even though the county's property tax included it.	
	• Ms. Summers asked if they could comment about the wall. Ms. Higuchi Sayegusa	Ms. Larson moved to support
	replied the proposal was for the house, but they could include suggested conditions for	the nomination of the
	researching the historic cultural and archaeological value of the wall.	Matsumoto Residence,
		Property Address: 2257 Kuai
		Road, Tax Map Key: (4) 2-8-
		018:031, Poʻipū, Hawaiʻi to
		the local and State Register
		and include the Director's
		Report recommendations to
		research the wall at a later
		time. Mr. Gately seconded the
		motion.
		Roll Call Vote:
		Mr. Gately – Yes
		Ms. Kikuchi-Samonte – Yes
		Ms. Larson – Yes
		Mr. Long – Yes
		Ms. Quinsaat – Yes Ms. Summers – Yes
		Ms. Wichman – Yes
		Vice Chair Remoaldo – Yes
		Chair Ida – Yes
		Motion carried 9-Yes
I. Executive	The commission did not need to enter executive session.	interior currently in the
Session		
	1. Nomination to the State Historic Register	
	The Makai Golf Course at Princeville	
	Property Address: 4080 Lei O Papa Road	
	Tax Map Keys: (4) 5-4-005:022; (4) 5-4-005:049; (4) 5-4-005:054; (4) 5-4-006:003; (4) 5-4-	
	006:005; (4) 5-4-006:006; (4) 5-4-012:001; (4) 5-4-012:006	

SUBJECT	DISCUSSION	ACTION
	Princeville, Hawai'i	
	Consideration of a historic property for nomination to the State Register of Historic Places.	
	a. Director's Report pertaining to this matter.	
	2. Nomination to the State Historic Register	
	Matsumoto Residence	
	Property Address: 2257 Kuai Road	
	Tax Map Key: (4) 2-8-018:031	
	Poʻipū, Hawaii	
	Consideration of a historic property for nomination to the State Register of Historic Places.	
	b. Director's Report pertaining to this matter.	
И.		
Announcements	Ms. Valenciano announced Duke Nakamatsu would email everyone asking for confirmation to	
	attend the November meeting. They would like to avoid a December meeting.	
	Next meeting was scheduled for 1:30 p.m. Thursday, November 16, 2023	
		77' Cl ' D 11 1
	With no further business to conduct, Chair Ida called for a motion to adjourn.	
lajournment		
		modon. Modon carried 9:0.
		Chair Ida adjourned the
		_
-	,	Vice Chair Remoaldo m to adjourn the meeting. Wichman seconded the motion. Motion carried 9. Chair Ida adjourned the meeting at 4:24 p.m.

Kaua'i Historic Preservation	Review Commission
Open Session	
October 19, 2023	

Page 18

Submitted by: Sandra M. Muragin, Commiss		Reviewed and Approved by:	Gerald Ida, Chair	
() Approved as circulated.() Approved with amendments. See minute	es of meeting.			

KAUA'I COUNTY HOUSING AGENCY

ADAM ROVERSI, DIRECTOR



October 6, 2023

OCT 12'23 PM1:15 PLANNING DEPT

Ms. Victoria Wichman
Kauai Historic Preservation Review Commission (KHPRC) c/o County of Kaua'i Planning Department
4444 Rice Streeet, Suite A473
Līhu'e, HI 96766

Subject:

National Historic Preservation Act, Section 106: Initiation,

Request for Contact Information, and Area of Potential Effects Concurrence for

Uahi Ridge Phase 1

Nawiliwili Ahupua'a, Puna Lihue, Island of Kauai

TMK: (4) 3-8-005-022:0002

Dear Ms. Wichman,

On behalf of the U.S. Department of Housing and Urban Development (HUD), the County of Kauai (County) would like to invite you to participate in consultation for the Uahi Ridge Phase 1 affordable rental housing project. On January 6, 2023, Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (2006), was initiated with the Department of Land and Natural Resources (DLNR) State Historic Preservation Division (SHPD) for the subject development project.

This proposed federally funded County project is considered a federal action and undertaking, as defined by 36 CFR Section 800.16(y). HUD has issued a Programmatic Delegation letter authorizing the County and local public agencies to conduct NHPA Section 106 consultations with the State Historic Preservation Division Officer (SHPO), Native Hawaiian organizations (NHOs), and qualified consulting parties per 36 CFR 800.2(c)(4). The HUD and the County will remain responsible for all findings and determinations charged to the agency during the Section 106 process.

Overview of the Undertaking

The project will consist of newly constructed eight 12-plex multi-family buildings totaling 96 units (including one manager's unit) and will consist of 47 one-, 25 two- and 24 three-bedroom units. These affordable rental units will be available to households with incomes up to 60% of Area Median Income. The purpose of this project is to provide an affordable residential option for the citizens of Kauai. Each multi-plex building will be three stories with walkups. The maximum building height will be up to 40 feet high above ground level, depending on construction type. The exterior of each building will be painted



using earth tone colors and will be complementary to and compatible with the surrounding natural background.

Project amenities include an office building, a multi-purpose building, a maintenance building, playground equipment, barbecue areas, charging stations for electric vehicles, and storage areas. Mature landscaping will be planted along the Kaumuali'i Highway frontage to help soften the building mass when viewed from the highway.

It is anticipated that any partial road closures during construction would be limited to daytime hours. However, should full road closures and night work become necessary due to site and local traffic conditions, they will be in accordance with local law and regulations.

Consultation

Entitled consulting parties during the Section 106 process includes the Advisory Council on Historic Preservation, SHPO, NHO's, and if applicable, local governments and applicants for federal assistance, permits, licenses and other approvals.

NHO and/or Hawaiian Descendants

NHO or Native Hawaiian descendants with ancestral, lineal, or cultural ties to, cultural and historic property knowledge and/or concerns for, and cultural or religious attachment to the proposed Area of Potential Effect (APE) are asked to provide a response to this letter within 30 days of notification.

Other Individuals and Organizations

Individuals and organizations with economic, legal or preservation interest are requested to respond within 30 days of this notification to demonstrate your interest in the proposed undertaking and provide intent to participate in the Section 106 process.

Area of Potential Effects

The project will be located North of Kaumuali'i Highway and consists of a parcel currently owned by Koamalu Plantation LLC. The new residential structures will be situated solely on Tax Map Key (TMK) (4) 3-8-005-022:0002 (Also known as APT 2). APT 3 of the TMK will later be developed into Uahi Ridge Phase 2, however, it has completely separate financing. APT 1 of the TMK will continue its current use with Aloha Church and is not a part of the project.

The proposed APE consists of (TMK) (4) 3-8-005-022:0002 and amounts to approximately 6.53 acres or 284,447 square feet. Please see the enclosed maps and photos of the APE.

Except for utility installation, the work will remain within the parcel and include grading and excavating for the new building foundation, trenching for the installation of the underground utilities and sewer; and drilling, and construction of the new residential buildings.

We welcome any information you may have on historical and cultural sites that have been recorded, or which you may have knowledge of within the proposed APE. In addition, if you are acquainted with any

persons or organization that is knowledgeable about the proposed APE, or any descendants with ancestral, lineal, or cultural ties to or cultural knowledge and/or historical properties information of, or concerns for, and cultural or religious attachment to the proposed project area, we would appreciate receiving their name and contact information within 30 days of this notice.

Request for Information

Pursuant to 36 CFR Part 800.3(f) in consultation with the SHPO, we are interested if your agency is acquainted with any NHO or Hawaiian descendants with ancestral, lineal, or cultural ties to or cultural and/or historic property knowledge of or concerns for, and cultural or religious attachment to the proposed project area, we would appreciate receiving their names and contact information within the 30 days of notification.

A virtual Public Information Meeting (PIM) is planned for November 13, 2023. Further details to follow. Please respond to this letter via email if you are interested in being notified and wish to attend.

Conclusion

By way of this letter, the County is notifying you of the proposed Uahi Ridge Phase I project. Should you want to participate in Section 106 process, we request a written intent. In addition, please include comments, if any, on the proposed APE. We also request comments and information you may have on historic or cultural sites you are aware of within the APE. Lastly, should you know any person or organization affiliated to the project area, we would appreciate their contact information.

We would appreciate a written response by November 13, 2023, to Steve Franco via email at sfranco@kauai.gov or by U.S. Postal Service to County of Kauai, (4444 Rice St, Lihue, HI 96766).

We look forward to working with you on this needed affordable housing project.

Sincerely,

Adam P. Roversi Housing Director

Enclosures:

Figure 1: Tax Map Key

Figure 2: Project Location Map
Figure 3: Area of Potential Effects





380050220002 Situs/Physical Acreage 6.532 Class RESIDENTIAL

Address Mailing Address **UAHIST** KOAMALU PLANTATION

C/O MOWER, LESLIE 3189 CANYON RD **SPRINGVILLE UT 84663**

\$3,336,200 Last 2 Sales **Total Market Value** \$3,336,200 Date **Total Assessed**

3/15/2005 \$1900000 VALID Value **Total Exemptions** \$3,336,200 n/a **Total Net Taxable** Value

SALE n/a

Price

Reason

Brief Tax Description APT 2 KOAMALU PLANTATION CM 2471 TOG W/UND 45% INT IN ALL COMMON **ELEMENTS**

(Note: Not to be used on legal documents)

The Geographic Information Systems (GIS) maps and data are made available solely for informational purposes. The GIS data is not the official representation of any of the information included, and do not replace a site survey or legal document descriptions. The County of Kauai (County) makes or extends no claims, representations or warranties of any kind, either express or implied, inluding, without limitation, the implied warranties of merchantability and fitness for a particular purpose, as to the quality, content, accuracy, currency, or completeness of the information, text, maps, graphics, links and other items contained in any of the GIS data. In no event shall the County become liable for any errors or omissions in the GIS, and will not under any circumstances be liable for any direct, indirect, special, incidental, consequential, or other loss, injury or damage caused by its use or otherwise arising in connection with its use, even if specifically advised of the possibility of such loss, injury or damage. The data and or functionality on this site may change periodically and without notice. In using the GIS data, users agree to indemnify, defend, and hold harmless the County for any and all liability of any nature arising out of or resulting from the lack of accuracy or correctness of the data, or the use of the data.

Date created: 9/9/2023 Last Data Uploaded: 9/8/2023 4:17:59 AM



Uahi Ridge Phase 1 Figure 2: Project Location Map



Uahi Ridge Phase 1 Figure 3: Area of Potential Effects





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1/0 Planning Department

Ms. Victoria Wichman Kauai Historic Preservation Review Commission (KHPRC) 4444 Rice Streeet, Suite A473 Lihue, HI 96766

019201-B0490

DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



Kaua'i County Historic Preservation Review Commission (KHPRC)

DIRECTOR'S REPORT

I. SUMMARY

Action Required by KHPRC: To provide comments in a Section 106 response letter regarding the proposed project's potential effect on historic properties.

KHPRC actions may include the following:

- a. Provide comments in a response letter; or
- b. Defer comments until more information becomes available.

II. PROJECT INFORMATION

Parcel Location:	Līhu'e, Hawai'i		
Tax Map Key(s):	(4) 3-8-005:022:0002	Area:	6.5320 acres/ 284,534 sq. ft.
Age of Structures	N/A for Phase I		
Applicant/ Agency	County of Kaua'i Housing Agency/ U.S. Department of Housing and Urban Development (HUD)		

III. PROJECT DESCRIPTION AND BACKGROUND

The County of Kaua'i Housing Agency, on behalf of the U.S. Department of Housing and Urban Development (HUD) (hereinafter referred to as the "Agency"), is requesting comments as part of the Section 106 consultation process. The trigger for this Section 106 review is the proposed use of federal funding to construct this County housing project.

Phase I Description

As represented, the proposed project, which is located along Kaumuali'i Highway and adjacent to Aloha Church, involves the construction of eight, 12-plex multifamily buildings that will total to 96 units (including a manager's unit). Of the 96 units, there will be a diversity of unit types with 47 one-bedroom units, 25 two-bedroom units, and 24 three-bedroom units.



Kaua'i Historic Preservation Review Commission (KHPRC) November 16, 2023 Meeting Section 106- County of Kaua'i Housing Agency Uahi Ridge Phase 1 Affordable Rental Housing Project Līhu'e, Hawai'i TMK: (4) 3-8-005:022:0002 HPRC-2024-5 Page 2

Phase II Description

It should be noted that this Section 106 is only limited to the Phase I development (CPR Unit 2) and that the development of Phase II (CPR Unit 3) will occur at a later time under separate funding and a separate Section 106 process.

IV. AREA OF POTENTIAL EFFECT (APE)

The Agency has identified the APE as the boundary of CPR Unit 2. As represented, except for utility installation, the work will remain within the parcel and include grading and excavating for the new building foundation, trenching for the installation of the underground utilities and sewer; and drilling, and construction of the new residential buildings.

The Department finds that additional information may be needed to clarify if the utility installation for Phase I will traverse into CPR Unit 3 which is slated for the development of Phase II. If the proposed work of Phase I traverses outside of the CPR Unit 2 boundary, then the Agency should reconsider adjusting their proposed APE Boundary to encompass the entire TMK or the combined area of CPR Unit 2 and CPR Unit 3.

V. IDENTIFICATION OF CULTURAL AND HISTORIC SITES

Based on the Department's review, the agency should note that there are historic properties associated with TMK: 3-8-005:022.

National and State Historic Register:

The subject property is not listed on the National and State Historic Register.

Kauai Historic Preservation Review Commission Information:

• The Kauai Historic Preservation Review Commission Inventory List identifies a "Lihue Plantation Manager's House" under TMK: 3-8-005:022.

VI. RECOMMENDATION

The Planning Department recommends that the Kaua'i Historic Preservation Review Commission make a motion to provide comments in a response letter pertaining to the Area of Potential Effect (APE), the identification of historic properties, and/ or the proposed project's effect on historic properties.

Kaua'i Historic Preservation Review Commission (KHPRC) November 16, 2023 Meeting Section 106- County of Kaua'i Housing Agency Uahi Ridge Phase 1 Affordable Rental Housing Project Līhu'e, Hawai'i TMK: (4) 3-8-005:022:0002 HPRC-2024-5

Page 3

The Commission is further advised that this report does not represent the Planning Department's final recommendation in view of the forthcoming public hearing process whereby the entire record should be considered prior to decision making. The entire record includes but is not limited to:

- a. Government agency comments;
- b. Testimony from the general public and interested others; and
- c. The land owner's response.

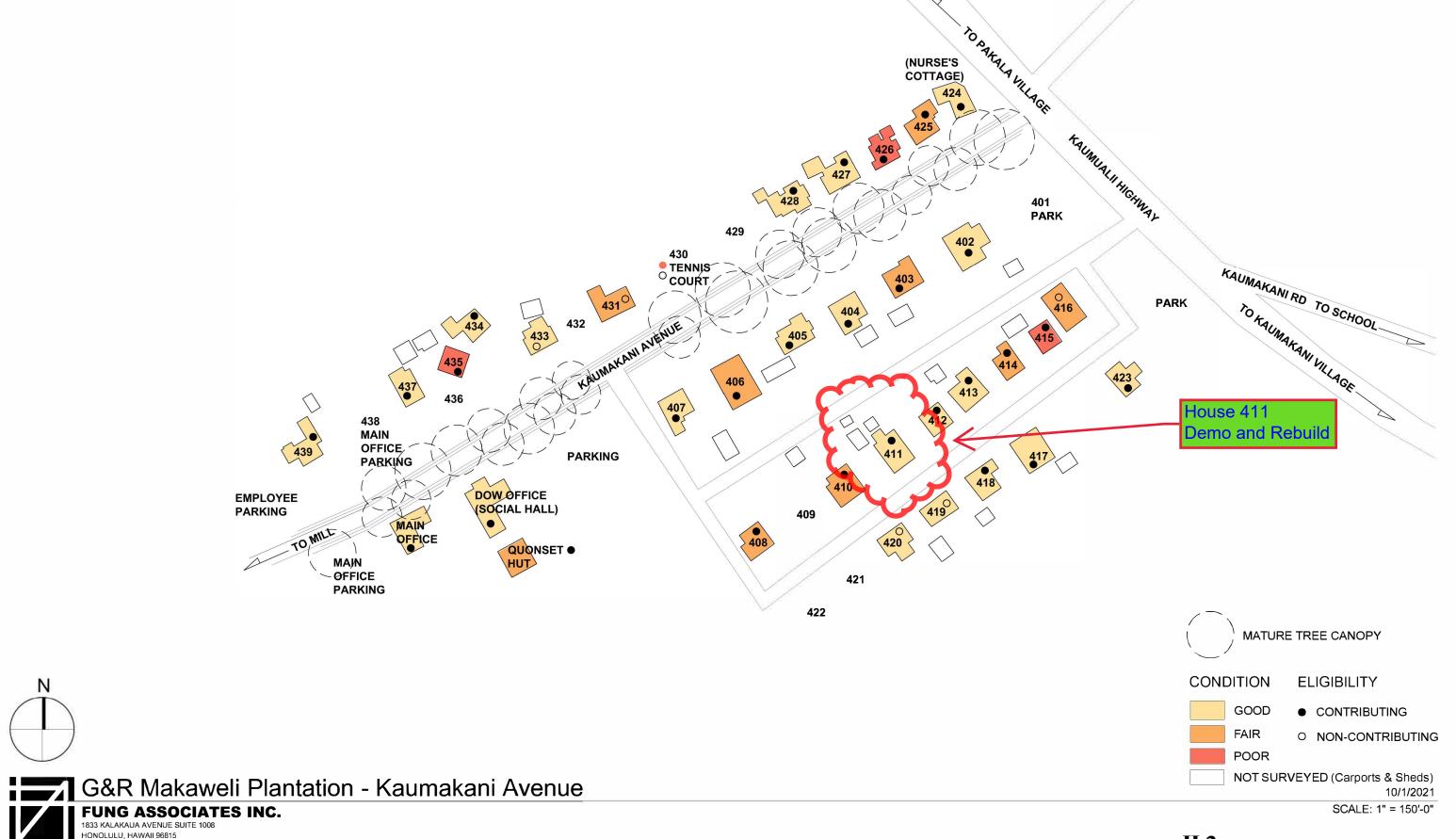
MARISA VALENCIANO
Planner

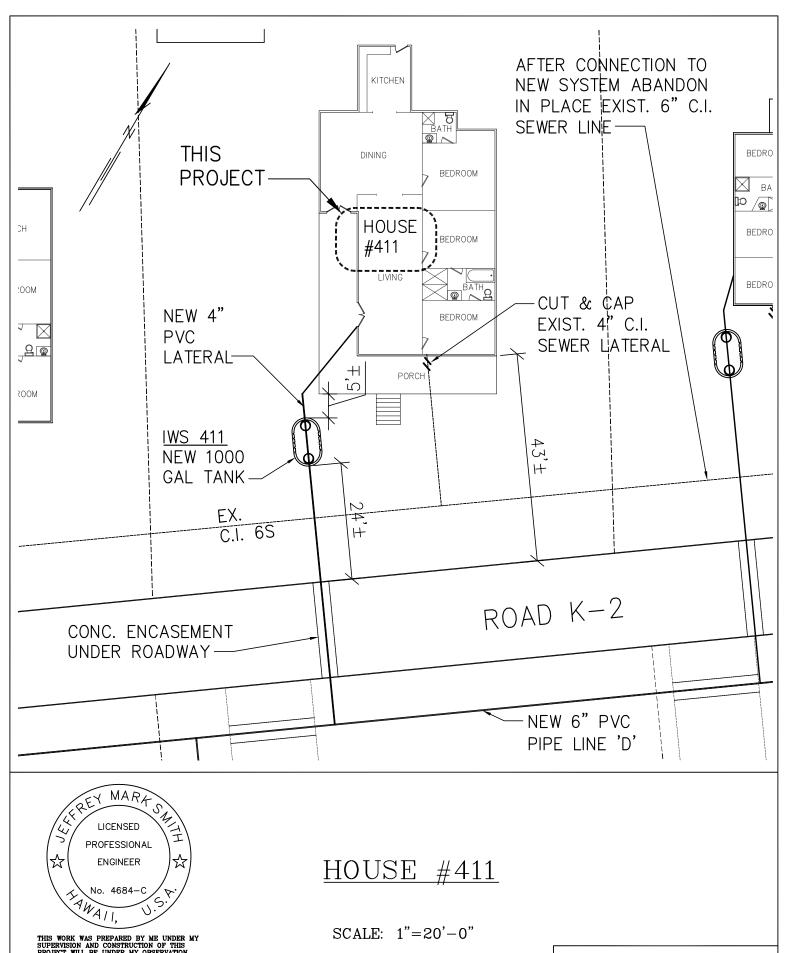
Approved & Recommended to Commission:

JODI A. HIGUCHI SAYAĞUSA

Deputy Director of Planning

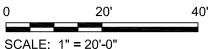
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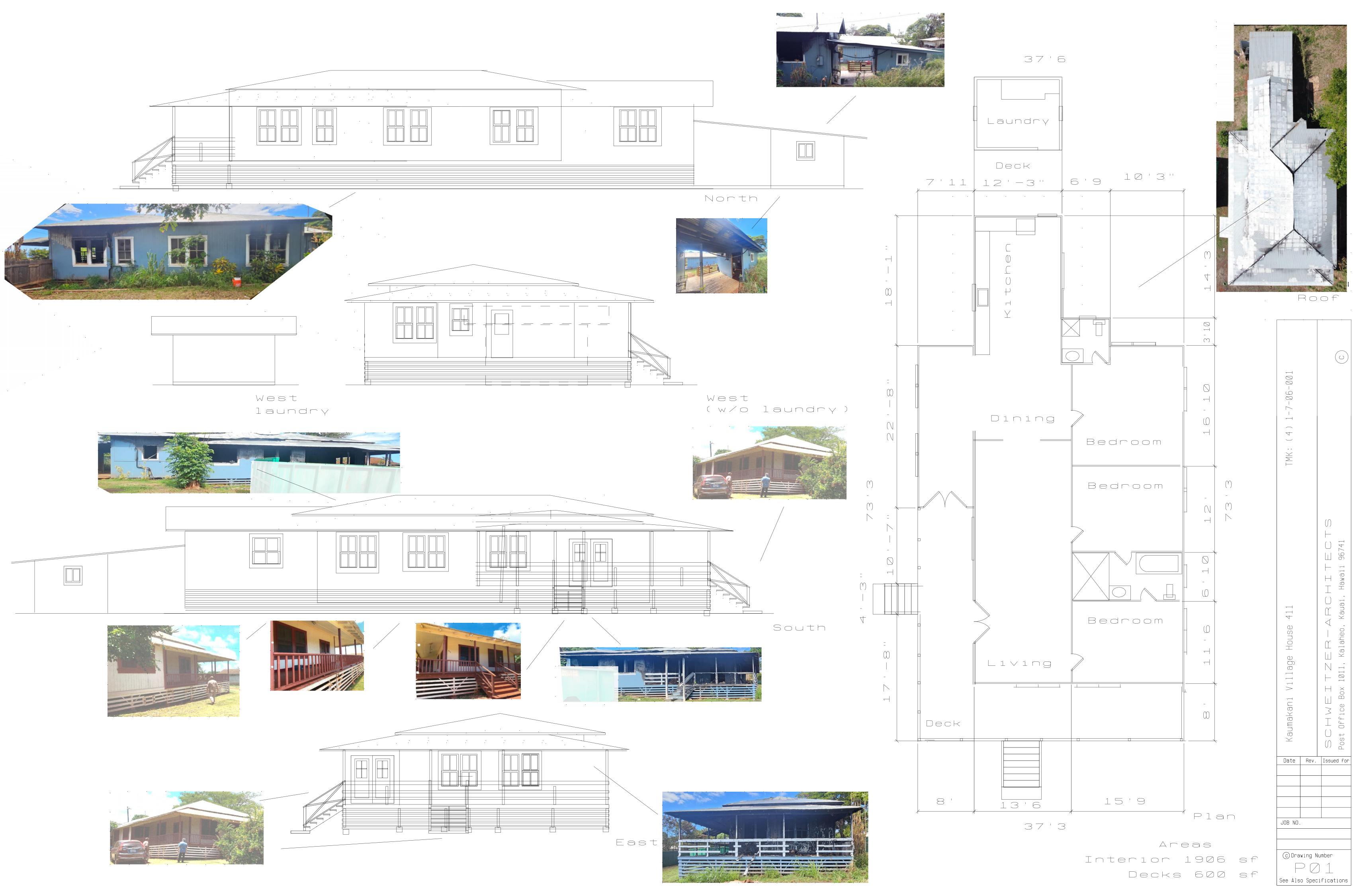


THIS WORK WAS PREPARED BY ME UNDER MY SUPERVISION AND CONSTRUCTION OF THIS PROJECT WILL BE UNDER MY OBSERVATION.

DATE LICENSE EXPIRES 04/30/2010



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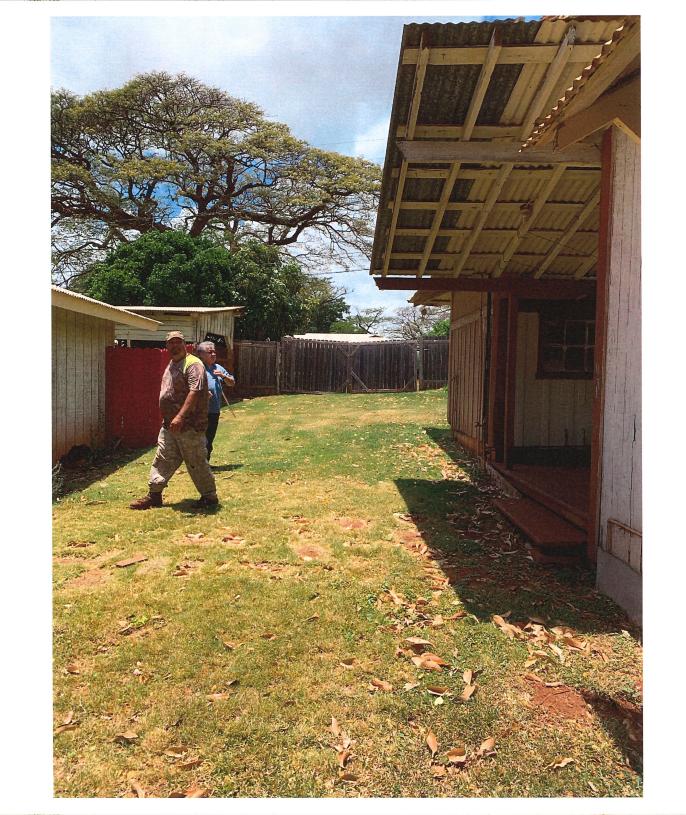














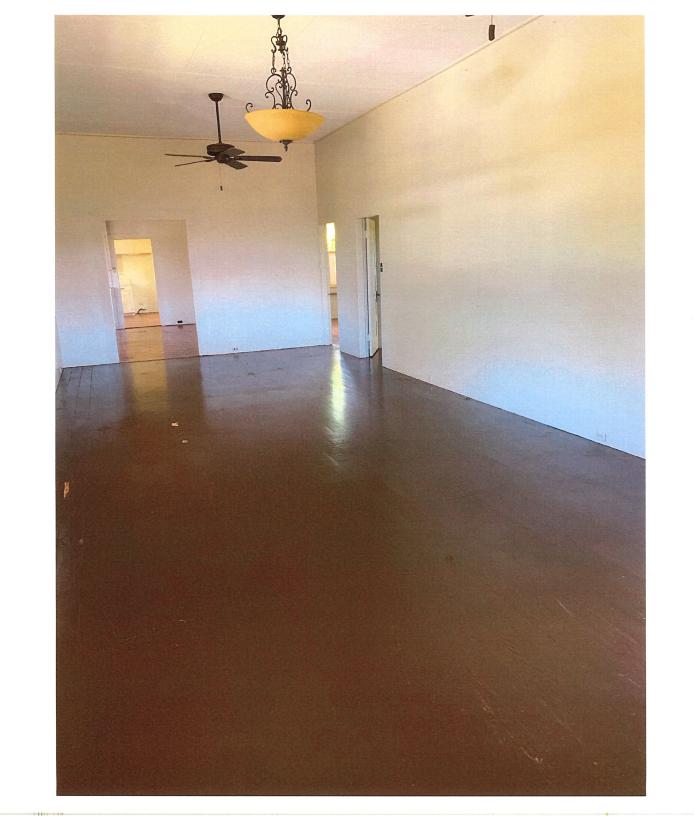


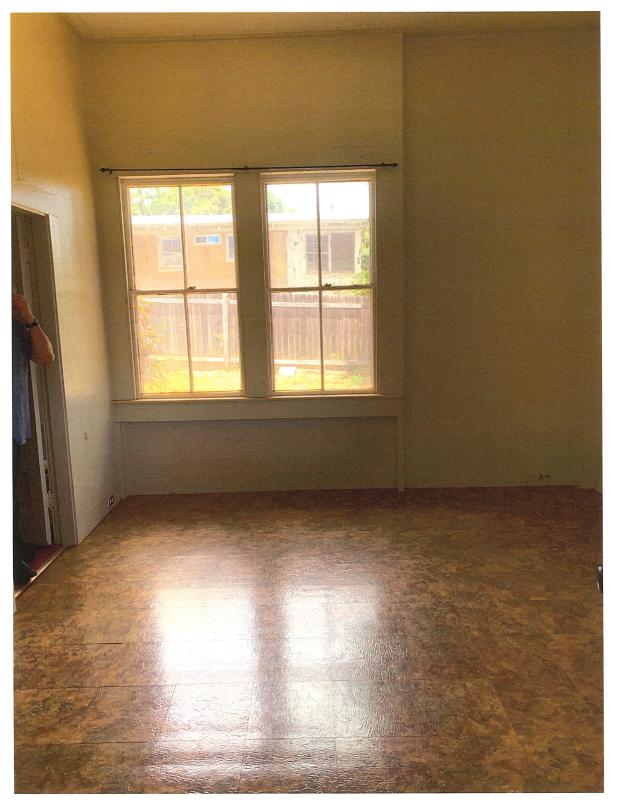




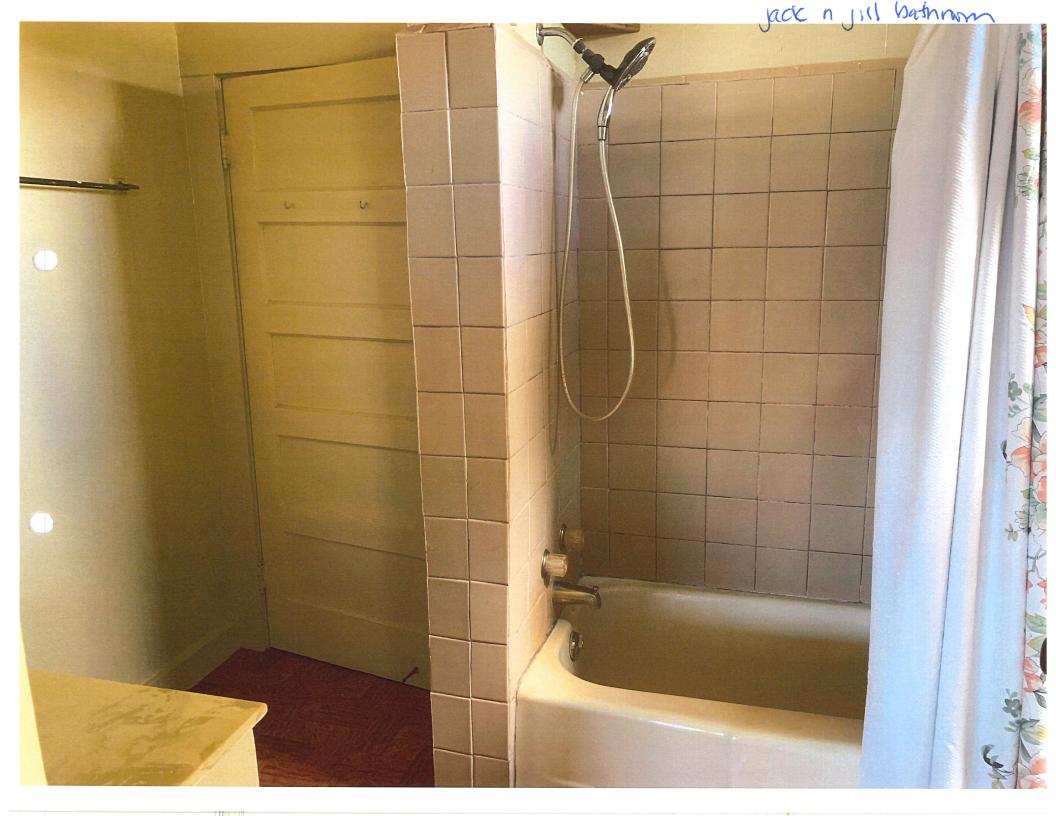




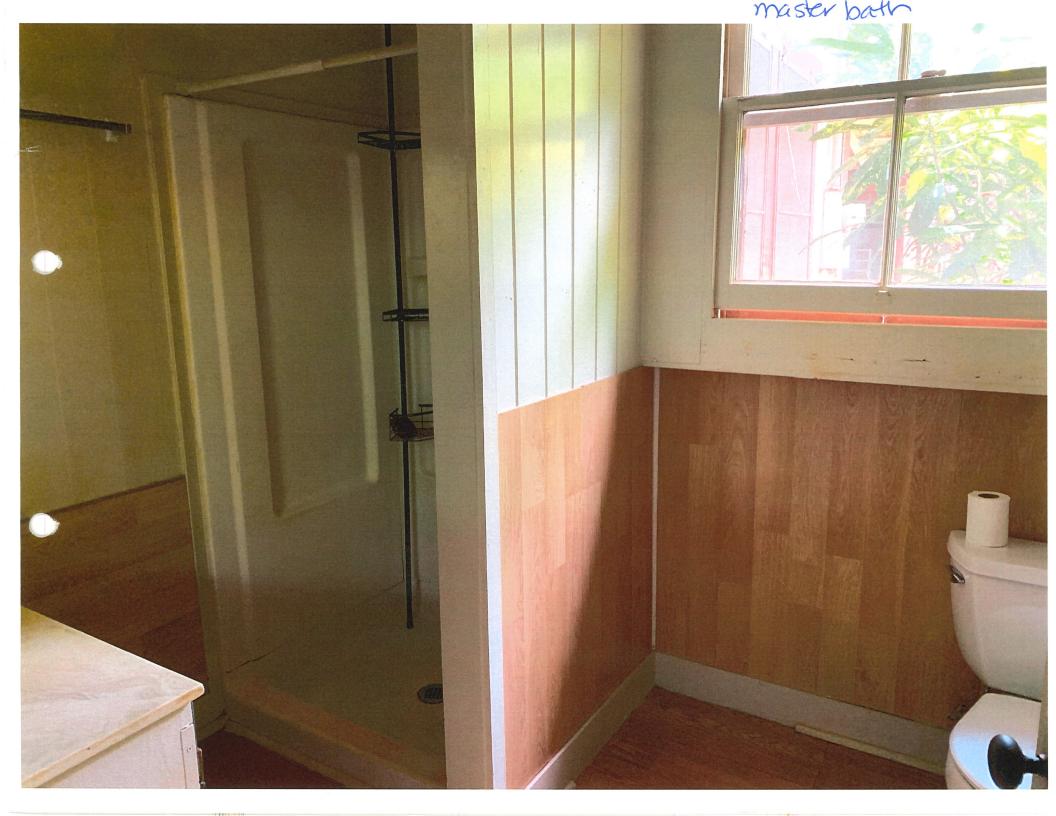
















DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



Kaua'i County Historic Preservation Review Commission (KHPRC)

DIRECTOR'S REPORT

I. SUMMARY

Action Required by KHPRC:

Consideration of a Class I Zoning permit for the proposed demolition and the proposed reconstruction of an existing single-family residence, House #411, located within Kaumakani Avenue.

KHPRC action may include the following:

- 1) Support for the project as represented; or
- 2) A recommendation that its approval of the project should incorporate conditions of approval; or
- 3) A recommendation to consider denial of the permit; or
- 4) A recommendation to defer action on the permit

II. PROJECT INFORMATION

Permit Numbers	HPRC-2024-6 Class I Zoning Permit Z-I-2024-XX Building Permit BP-24-XX		
Parcel Location:	Kaumakani, Kauaʻi		
Tax Map Key(s):	(4) 1-7-006:001	Area:	46,937,207 sq. ft./ 1,077.5300 acres (for the entire parcel)
LAND USE DESIGNATIONS & VALUES			
Zoning:	Plantation Camp Zoning District and T3KA (Plantation Camp Form Based Code)		
State Land Use District:	Urban		
General Plan Designation:	Plantation Camp		
Owner(s)/ Applicant:	Gay & Robinson, Inc.		



III. PROJECT DESCRIPTION

The Applicant, Gay & Robinson, Inc., is proposing a full demolition and complete reconstruction of an existing single-family residence, House #411, located within Kaumakani Avenue. The existing residence recently sustained fire damage throughout portions of the structure, and the Applicant is proposing to demolish the structure and to reconstruct the residence within the same footprint and design of the existing home. The proposed reconstruction will only deviate from the original house design in the interior floor plan with the addition of a second bathroom.

The Applicant intends to carry forth the same character defining features with inkind materials that will also comply with building code requirements.

IV. TRIGGER FOR KHPRC REVIEW

Hawai'i Revised Statutes (HRS) §6E-2 defines "Historic property" as "any building, structure, object, district, area, or site, including heiau and underwater site, which is over fifty years old."

Hawai'i Administrative Rules Title 13 defines "Significant Historic Property" as "any historic property that meets the criteria" for listing on the Hawai'i Register of Historic Places under HAR 275-6(b) or HAR 2846(b).

Site/Building/Structure/Object <u>IS NOT</u> Listed on the National or State Historic Register.

The subject property is **NOT** located in a Historic District.

The property <u>IS</u> over 50 years old and <u>IS</u> by law defined as "historic property."

The subject property IS included on the KHPRC Inventory List.

V. CRITERIA FOR NOMINATIONS TO THE HAWAI'I REGISTER OF HISTORIC PLACES

In 2021, the Applicant prepared a "Historic Architectural Preliminary Assessment" (see attached as Exhibit A), hereinafter referred to as the "Fung Report," to ascertain whether certain plantation-related neighborhoods in

Kaumakani and Makaweli meet the criteria for listing in the Hawai'i and/ or National Registers of Historic Places. The Fung Report concluded that the three residential areas, including Kaumakani Avenue, appear to meet the criteria for listing in the Hawai'i and/ or National Register of Historic Places as three individual historic districts. Furthermore, the Fung Report asserts that Kaumakani Avenue has retained its historic integrity and appears to meet at a local level both <a href="https://criterion.com/Criterion.com/history.com/h

The Department <u>concurs</u> with the Fung Report assessment of Kaumakani Avenue's eligibility to be listed as a historic district on the State register.

VI. HISTORIC INTEGRITY

Aside from its setting and location, the historic integrity of the structure appears to have been <u>lost</u> due to the extensiveness of the fire damage. In photos provided by the Applicant, it appears that the exterior and interior portions of the structure were damaged thereby affecting the materials, design, workmanship as well as the feeling and association of a plantation home. In addition, it is unclear how the fire affected the structural integrity of the single-family residence.

VII. PRELIMINARY EVALUATION OF THE PROJECT

As represented in the Fung Report, it is unclear when House #411 was constructed but in 2021 the structure was surveyed as being a contributing building in good condition. The Fung Report identified the following character defining features of House #411: post-pier foundation, vertical tongue and groove walls, 2x2 double hung windows, metal roof material, pyramidal roof shape, and a wraparound lanai.

The Applicant is proposing to demolish the existing structure due to the recent fire damage and intends to reconstruct the residence to be in keeping with the same scale, size, and design of the existing home. The Applicant intends to use in-kind replacement materials, as feasible, to match the historic character of the existing home.

Although the proposed demolition is considered an effect to the historic property, the Applicant's proposal to reconstruct the existing home to match the original home is in keeping with the historic character of the area and should preserve the

area's eligibility to be nominated in the future. In addition, the Applicant's photos of the structure prior to the fire damage can also serve as photo documentation to mitigate the proposed demolition and as a reference during the reconstruction efforts.

As represented, the Applicant does not foresee any proposed ground disturbance as the existing footing is on concrete blocks and the proposed new footings will be poured in place.

VIII. RECOMMENDATION

Based on the foregoing evaluation, the Planning Department recommends that the Kaua'i Historic Preservation Review Commission <u>SUPPORT</u> the proposed demolition and the proposed reconstruction of House #411 with the following conditions:

- The Applicant shall reconstruct the home in the same orientation and placement of the original home.
- Where feasible, the Applicant shall consider using the original materials, that are salvageable, for the character defining features.
- Prior to demolition, the Applicant shall take interior and exterior photos of the structure and submit to the Department for its records.

The Commission is further advised that this report does not represent the Planning Department's final recommendation in view of the forthcoming public hearing process whereby the entire record should be considered prior to decision making. The entire record includes but is not limited to:

- a. Government agency comments;
- b. Testimony from the general public and interested others; and
- c. The land owner's response.

Ву

MARISA VALENCIANO

Planner

Approved & Recommended to Commission:

Ву

Jodi Higuchi Sayagusa

JODI A. HIGUCHI SAYAGUSA

Deputy Director of Planning

Date: 11-7-23

EXHIBIT "A"

Historic Architectural Preliminary Assessment Kaumakani and Makaweli, Kauai

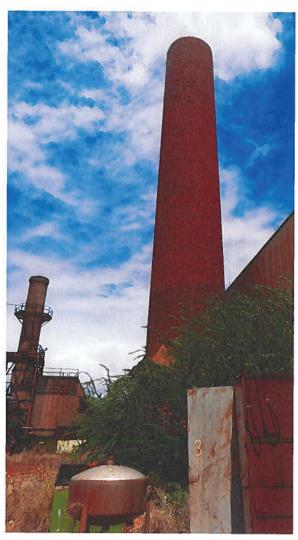
Prepared For:

Gay & Robinson, Inc.

Final February 11, 2022







SURVEY RESULTS: OVERVIEW

The three residential areas surveyed all appear to meet the criteria for listing in the Hawaii and/or National Registers of Historic Places as three individual historic districts. The mill with its stack and molasses tanks, as well as receiving station appears to meet the criteria for listing as an individual property. All four properties retain their historic integrity and appear to meet at a local level both **Criterion A** for their associations with the history of sugar on Kauai and **Criterion C** for being good examples of plantation architecture constructed in Hawaii during the first half of the twentieth century.

SURVEY RESULTS

KAUMAKANI AVENUE

Kaumakani Avenue Description

A picturesque lane embowered by royal poinciana trees (*Delonix regia*) and monkey pod trees (*Samanea saman*), Kaumakani Avenue is lined with seventeen houses sitting on large lots and set back from the paved street by a lawn unencumbered by fences. Terminating at the mill, in a circular turn about with lava rock curbs, this roadway was the focal point of the sugar operations at Makaweli, with a social hall and plantation office also standing along the street. In addition to the avenue, thirteen houses lining an unpaved street running parallel to the avenue on its east side were surveyed.

The single-story social hall still retains such Victorian architectural elements as the shingled front-facing gable and a bracketed eave line, most likely dates from 1906. During the twenty-first century, this building was used as a visitor center for plantation tours and now houses offices.

The reinforced-concrete plantation office, designed by Guy Rankin, the Hawaiian Sugar Company's civil engineer, was one of the earliest buildings in Hawaii to be rendered in the Spanish Mission Revival style, and upon its opening in 1917, the *Hawaiian Gazette* of August 10, 1917 found it to be, "a surprise in the way of up-to-date construction that puts it over anything in the plantation office line that we have seen." The twelve (12) concrete light posts gracing the avenue date from 1920 and were the earliest electric streetlights on Kauai. Four single-wall, tongue-and-groove residences near the highway date from C. Brewer's 1946-1947 housing revitalization program. Several houses below the tennis court derive from more recent efforts, and a few of the early twentieth century houses still stand along the avenue, including the board-and-batten nurse's cottage (1909) at the corner of Kaumakani Avenue and Kaumualii Highway.

^{1 &}quot;Plantation Office Building is Fine," Hawaiian Gazette, August 10, 1917, p. 8

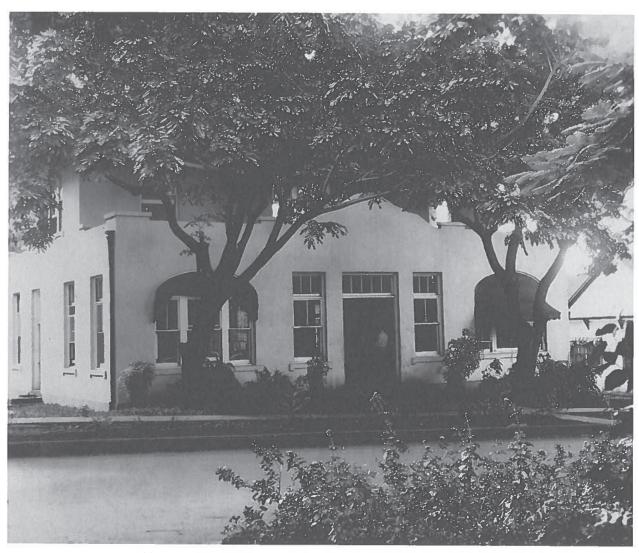
Kaumakani Avenue Survey Results

The avenue appears to meet the criteria for listing on the Hawaii and/or National Registers of Historic Places as a historic district under **Criterion A and C**. Running from Kaumualii Highway to the Hawaiian Sugar Company mill, Kaumakani Avenue served as the center of plantation activity. The plantation office, social hall, hospital and store/post office lined the street, along with skilled workers' housing.

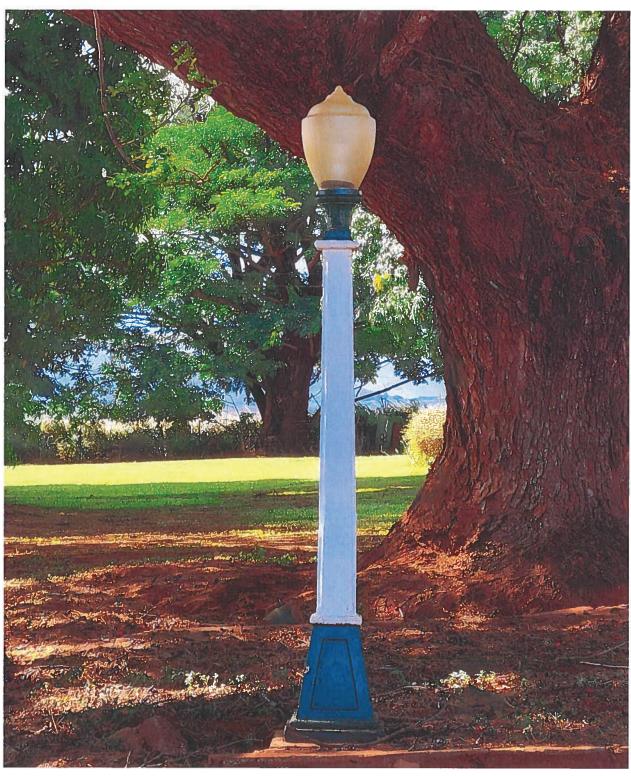
Although the store/post office and hospital are no longer extant, much of the avenue remains intact. The office, which still serves as the main office for Gay & Robinson, and the social hall stand as reminders of the street's important role since the early twentieth century. The mature royal poinciana and monkey pod trees, sidewalks, and concrete electric light posts further attest to the prominence of the avenue, as do the large lots on which the residences sit. The electric light posts, installed in 1920, are the earliest known electric street lights on Kauai.

Of the thirty houses, three (419, 420 and 433) are not over fifty years old and two (416 and 431) have their historic integrity compromised due to it being sufficiently remodeled. Two houses (415 and 435) appear to be abandoned, and while their condition is poor, it appears they can be rehabilitated. All of these houses maintain the scale and setting of the historic district and should be viewed either as compatible in-fill or contributing buildings. The tennis court, while of historic significance is in poor condition and appears to be of low preservation value.

Three houses (424, 437, and 439) appear to date from the early twentieth century, while oral tradition asserts four houses (402, 403, 404 and 405) were constructed as part of Olokele Sugar's 1946 revitalization program. House 408 may also have been part of that revitalization. Another six houses (412, 413, 414, 415, 434 and 435) are identical and appear to also date from the immediate post-war period with their front facing gable roofs, corner porches, and tongue and groove walls having internal girts.



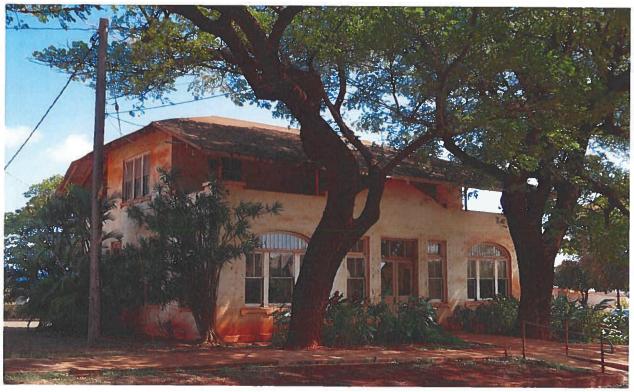
Kaumakani Avenue Plantation Office Building (1931)
Source: Provided by Gay & Robinson, Inc. (2021)



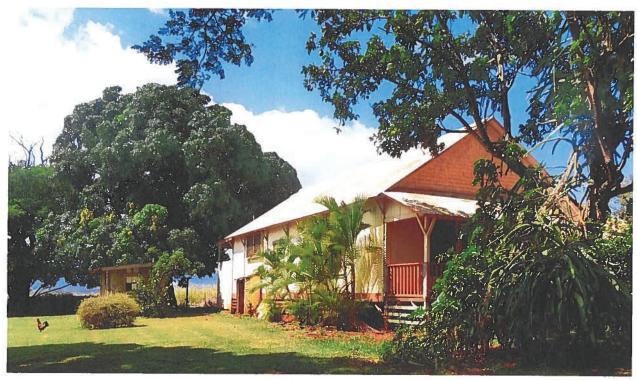
Kaumakani Avenue Light Post Source: Fung Associates Inc., 2021



Kaumakani Avenue Social Hall Source: Fung Associates Inc., 2021



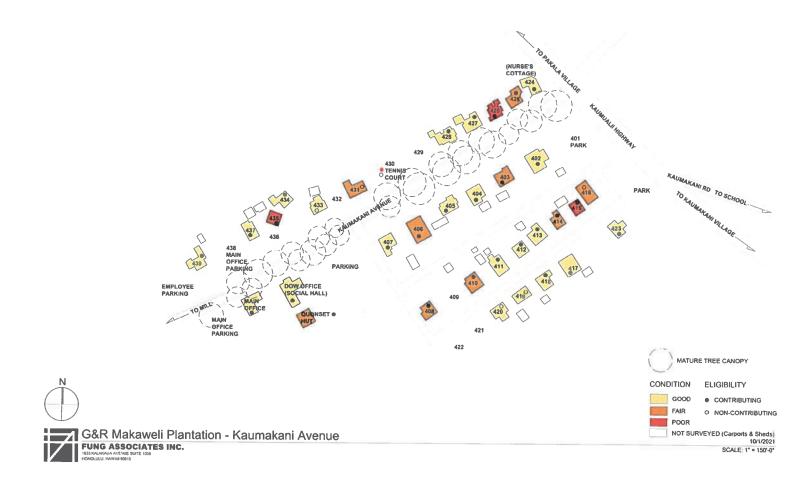
Kaumakani Avenue G&R Main Office Building Source: Fung Associates Inc., 2021



Kaumakani Avenue House 437 Source: Fung Associates Inc., 2021



Kaumakani Avenue House 403 Source: Fung Associates Inc., 2021



ELIGIBILITY TABLE

Survey Date: 8/25 & 8/26/2021

Map 8	Туре	Condition	Contributing	Post & Pier Foundation	Concrete Foundation	Vertical Exterior Walls	Horizontal Exterior Walls	Gable Roof Shape	Hipped Roof Shape	Other Roof Shape	Description (Nates)
aumakani Av											
401	Recreational	_ ·									Park
402	Residential	Good	Yes	✓						1	Vertical tongue & groove walls, Internal girt, 2×2 double hung sash windows, metal roof material, hip gablet roof shape, side entry, 1946 housing upgrade
403	Residential	Fair	Yes	_ / _		1			1		Vertical tongue & groove walls, internal girt, 2x2 double hung sash windows, "corner windows" metal roof material, 1946 housing upgrade
404	Residential	Good	Yes	1		1		/			T-111 siding, 2×2 double hung sash windows, roll roof material, lave rock stoop, 1946 housing upgrade
405	Residential	Good	Yes	✓		/				1	Vertical tongue & groove walls, internal girt, 2×2 double hung sash windows, L-shape massing, hip-gablet roof shape, 1946 housing upgrade
406	Residential	Fair	Yes	1		1		/			Vertical tongue & groove walls, 6x6 double hung windows, standing seam roof material, remodeled porch
407	Residential	Good	Yes	1			1		/		Horizontal siding, picture windows, 2x2 double hung windows with storm window, metal roof material
408	Residential	Fair	Yes	1		/					Vertical tongue & groove walls, internal girt, 2x2 double hung windows, metal roof material, potentially 1946 housing upgrade
409	Vacant Lot	-			-						vertical for gue a groove want, internal grit, 2x2 double nung windows, metal root material, potentially 1945 housing upgrade
410	Residential	Fair	Yes	1		4			1		Board & batten walls, 2x2 double hung window with storm window, new entry with awning above
411	Residential	Good	Yes	1		1				-/	Vertical tongue & groove walls, 2×2 double hung windows, metal roof material, pyramidal roof shape, wrap around fanai
412	Residential	Good	Yes	1		1		/			Vertical tongue & groove walls, internal girt, 6:6 double hung windows with storm windows, corner porch
413	Residential	Good	Yes	1		/	-	7			Vertical tongue & groove walls, internal girt, 616 double hung windows with storm windows, corner porch
414	Residential	Fair	Yes	-/		/		7			Vertical tangue & groove walls, internal girt, 6x6 double hung windows with storm windows, corner porch
415	Residential	Poor	Yes	/	-	1		-			
416	Residential	Fair	No	/		1			-/		Vertical langue & groove walls, Internal girt, 6x6 double hung windows with starm windows, corner parch
417	Residential	Good	Yes	1		1			-		Vertical Tongue & groove, accessible ramp, modified porch, remodeled
418	Residential	Good	Yes	1		7			7		Vertical Tongue & groove external girt, 6x6 double hung windows with storm windows, asphalt shingle roof material, double pitched hipped roof, Z-shape mass
419	Residential	Good	No	-/							Vertical Tongue & groove external girt, 6x6 double hung windows with storm windows, hip roof with 2 breaks, potentially state or ceramic tile roof material
420	Residential	Good	No	-							I-111 siding, aluminum windows, asphalt shingle roof material, hip-gablet roof shape
421	Vacant Lot	0000	NO .								I-111 siding, aluminum sliding windows, asphalt shingle roof material
422	Vacant Lot				-					-	•
423	Residential	Good	Yes		_						Y 111 didn't 1-1 di Mila Nova d
424	Residential	Good	Yes	1	\neg				-/-		T-111 siding, 1x1 double hung windows with storm windows, metal roof material, hip-gablet roof shape
425	Residential	Fair	Yes			1			-		Board & batten walls, 6x6 double hung windows with storm windows, outset porch, accessible ramp, Nurse's Residence, early 20th century house
426	Residential	Poor	Yes			1			-		Vertical Tongue & groove walls, external girt, 2x2 double hung windows, metal roof material, centered projecting parch
427	Residential	Good	Yes	_		7			-		Vertical Tongue & groove walls, external girt, 2x2 double hung windows, metal roof material, centered projecting porch
428	Residential	Good	Yes	-	<u> </u>						Vertical Tongue & groove walls, 2x2 double hung windows with storm windows, metal roof material, hlp-gablet roof shape, foundation covered
429	Vacant Lot	4	,								Vertical Tongue & groove walls and T-111 siding, 2x2 Double-hung windows with storm windows, metal roof material, hip-gablet roof shape, decorative iron handrai
430	Recreational	Poor	No					· ·	<u> </u>	_ ·	Tennis Court
431	Residential	Fair	No	1		1			-/		
432	Vacant Lot				-						Board & batten walls, Jalousie and picture windows, metal roof material, post-Hurricane triki remodel
433	Residential	Good	No	1		1		/			T-111 siding, aluminum windows, metal roof material, post-Hurricane Iniki prefab house
434	Residential	Good	Yes	-/		1		1			T-111 siding, 6x6 double hung windows, metal roof material, corner porch
435	Residential	Poor	Yes	1		1		1			
436	Vacant Lot	-		-		-	-			-	Vertical Tongue & groove walls, internal girt, 6x6 double hung windows, metal roof material, enclosed corner porch
437	Residential	Good	Yes	1		1		7			Vertical Tongue & groove walls, metal roof material with shingled gable end, outset porch, front addition, early 20th century house
438	Vacant Lot		-	•			-				parties, mont abouting early 20th Century flugge
439	Residential	Good	Yes	/		1		✓			2x2 double hung windows with storm windows, metal roof material with shiplap gable end, outset porch, rear addition, early 20th century house
OW OFFICE	Commercial	Good	Yes	1		1		- /			Vertical Tongue & groove walls, replacement windows, metal roof material with shingles, Victorian Architecture, Social Hall, early 20th century house
ONSET HUT	Industrial	Fair	Yes	-							Metal exterior walls, Quanset Hut, Behind DOW Office
AIN OFFICE	Commercial	Good	Yes		✓.					V	Smooth exterior walls, 2x1 windows with transoms above, Pyramidal and flat roof shape, Spanish Mission Revival Style, G&R Office, early 20th century house



November 1, 2023

Marisa Valenciano Planning Department County of Kauai 4444 Rice Street, A473 Lihue, Kauai, Hawaii 96766

Subject:

Removal of McBryde Sugar Company Camp 9 ("Numila Camp")

Eleele, Kauai, Hawaii TMK No. (4) 2-2-001:001

Dear Ms. Valenciano:

Alexander & Baldwin, Inc. (A&B), through its subsidiary McBryde Sugar Company, LLC (McBryde), is planning to remove all dwellings and accessory structures located within an approximately 16-acre area at the former McBryde Sugar Company Camp 9 ("Numila Camp").

In June 2022, McBryde sold the property upon which the camp is located to BBCP Kauai Operating, LLC, the current owner. Under the Purchase and Sale Agreement (PSA) for the property, McBryde retained ownership of certain dwellings and accessory structures in the camp (the "Dwelling Improvements"). McBryde is obligated under the PSA to, by a specified completion deadline, remove the Dwelling Improvements and complete various other work within a 16-acre easement area that encompasses most of the existing camp. McBryde is in the process of undertaking this work, including preparing applications for all necessary permits from the County of Kauai and the State of Hawaii Department of Health.

All of the dwellings and most of the accessory structures in the camp are more than 50 years old and are therefore considered "historic property". We therefore understand that this project is subject to review by the Kauai Historic Preservation Review Commission (KHPRC) and (potentially) the State Historic Preservation Division (SHPD) of the Hawaii Department of Land and Natural Resources (DLNR).

The purpose of this letter is to provide an introduction of the project to KHPRC in anticipation of presenting it to the Commission for review and recommendations at its upcoming November meeting. A detailed discussion of the project, along with supporting documentation, is enclosed. We will be pleased to answer any immediate questions about the project that the Commission may have at the upcoming meeting, and/or to provide additional detailed information if and as requested at a subsequent Commission meeting.

I look forward to meeting with you and the Commission on November 16, 2023 to discuss our project. If you have any questions or require additional information in the meantime, please feel free to call or email me.

Sincerely,

Sean M. O'Keefe

Director, Environmental Affairs

Alexander & Baldwin, Inc.

cc: W. Eddy, J. Gibb, N. McMahon, S. Smith

Enclosures

Numila Camp Closure and Removal Project Summary

(November 2023)

Project Participants

Alexander & Baldwin, Inc., through its subsidiary McBryde Sugar Company, LLC Your Way Home, LLC

Landowner

BBCP Kauai Operating, LLC

Project Overview

Numila Camp (also known as Camp 9 or "Mill Camp") is a McBryde Sugar Company, Ltd. plantation camp located at the former McBryde Sugar Mill ("New Mill") along Halewili Road (State Highway 540) between Eleele and Kalaheo, Kauai, Hawaii (see Exhibit A). The camp is currently vacant. Remnants of the camp occupy approximately 16 acres of a 1,465-acre parcel designated as Tax Map Key Number (4) 2-2-001:001, owned by BBCP Kauai Operating, LLC (BBCP).

BBCP purchased the land in 2022 from McBryde Sugar Company, LLC (McBryde), a subsidiary of Alexander & Baldwin, Inc. (A&B). Under the Purchase and Sale Agreement (PSA) for the property, McBryde retained ownership of all "Dwelling Improvements" within the camp (which includes, among other things, all residential dwelling units and accessory structures), and is legally obligated to remove these Dwelling Improvements and to perform certain other work. An exclusive easement over the existing camp area has been granted to McBryde for the completion of this work within a specified timeframe (see Exhibit B).

A&B intends to meet its legal obligations under the PSA by removing all dwellings and related outbuildings located within the 16-acre easement area. The project scope is limited to the easement area only; A&B has no legal obligations nor any rights with respect to areas outside the easement.

Existing Camp Description

The portion of Numila Camp to be removed, located within the 16-acre easement area, consists of 35 former plantation houses, along with approximately 73 outbuildings (see Exhibits D and E-1). The outbuildings include garages, laundry houses, storage sheds, covered lanais, carports, chicken coops, and similar structures. Plantation records indicate that all of the houses and many of the outbuildings in the camp are more than 50 years old. Representative photographs of the camp structures are provided in Exhibit K.

The camp is arrayed along a main road (McBryde New Mill Road) running roughly north to south from Halewili Road to the former McBryde Administration Building (now occupied by Kauai Coffee Company (KCOF)), along with three side roads running to the west from the main road. All camp roads are unpaved. The camp is bordered to the north by Halewili Road, to the east by coffee fields, to the south by the former sugar mill (now the KCOF processing facility) and Administration Building, and to the west by the KCOF Visitor Center and Halewili Road.

A limited number of former camp structures, as well as some structures original to the sugar mill, remain outside of the easement area and are not included as part of this project. These include the Administration Building, a former Carpenter/Plumber Shop located on the main road in the camp (recently converted to a dwelling for use by KCOF temporary farm labor), and two former plantation houses that have been converted to use as office space for KCOF agricultural operations. The KCOF Visitor Center is located on a separate parcel to the west of the camp that formerly served as a park for camp residents and is also excluded from the project.

Utilities

The camp received electrical power from Kauai Island Utility Cooperative (KIUC) via power lines running through the camp. Power to the camp is currently limited to a few streetlights; all electrical service connections to camp houses and other structures within the easement area have been removed.

Potable water was provided to the camp via a private water distribution system (known as the Wahiawa water system and owned by BBCP) that is consecutive to the County of Kauai's Hanapepe-Eleele Public Water System. Due to recent upgrades to the water distribution system, only a limited number of houses in the camp still have service lines and all of these existing service connections are shut off at the meter. The water system still provides potable water to the KCOF coffee processing facility and shops (located in and around the former sugar mill), to the Administration Building, and to the Visitor Center.

A private fire main with hydrants also serves the camp, as well as the KCOF facilities. This system is supplied from an off-site cistern filled using ditch water from the former McBryde irrigation systems (now owned and operated by BBCP).

All dwelling units within the camp were formerly served by large-capacity cesspools, which were closed in 2004 to comply with federal regulations. Twenty-seven of the houses were connected to septic systems when the cesspools were closed; the remainder were already vacant at the time and did not need to be connected to any wastewater system. The majority of the houses served by septic systems are covered by a wastewater system variance issued by the Hawaii Department of Health; that variance will expire in February 2024, at which time these houses will no longer have usable wastewater systems. The removal of all septic systems located within the camp is part of the work to be completed by A&B.

Project Description

As described above, the project primarily entails removing all "Dwelling Improvements" from the camp. This includes removal of residential dwelling units, accessory structures, fencing, gates, septic systems, and other improvements within the easement area in compliance with the PSA. To the extent practicable, efforts are being made to preserve salvageable structures for relocation, renovation, and re-use off-site; any structures which cannot realistically be preserved for off-site use will be demolished (see Exhibits C and E-2). At the conclusion of the project, the 16-acre easement area will be vegetated open space vacant of any structures pending future land use decisions by the property owner (see Exhibit E-3).

The project also includes removal and disposal of accumulated rubbish and debris within the structures and elsewhere throughout the camp, along with vegetation that has become heavily overgrown over time since the camp has gradually been vacated; this portion of the work is already underway.

The majority of the structures throughout the camp, including many of the dwellings, are in an advanced state of dilapidation, with extensive termite infestation/damage, rot, water damage, and damage due to vandalism and theft. Nevertheless, as a potential alternative to complete demolition of the camp, McBryde has entered into an agreement with Your Way Home, LLC (YWH) that – subject to certain conditions - allows YWH to re-locate camp houses off-site to be renovated and re-purposed as private dwellings. YWH subsequently conducted inspections of all homes in the camp and identified up to 19 homes in the camp that – in the opinion of YWH - are in a condition that could allow them to be safely moved and cost-effectively renovated for re-use and re-sale. This assessment has been made solely by and for YWH based upon the objectives and anticipated economics of their specific re-use project and taking into consideration the risk tolerance of YWH and its investors. The remaining homes were deemed to be in such an advanced state of deterioration that they cannot be safely relocated and/or cost-effectively renovated. McBryde has provisionally transferred ownership of these 19 homes to YWH, and YWH has identified properties in Koloa, Kapaa, and Wailua where it intends to relocate the houses it has acquired (see Exhibits G-1, G-2, and G-3).

Subject to further inspection by YWH's structure moving contractor prior to re-location, YWH intends to transport each of the 19 camp houses they own to properties it owns or controls, where they will be refurbished and used as permanent dwellings.

The remaining 16 houses in the camp, and all outbuildings in the camp will be demolished and disposed of off-site. Also to be demolished will be those portions of the YWH-owned camp houses that are not feasible to move (e.g., limited portions of the houses – such as attached laundry rooms, storage sheds, carports, or covered lanai areas – that are located on-grade rather than being of post-and-pier construction like the rest of the house). Any of the 19 YWH-owned houses that YWH ultimately determines they cannot feasibly re-locate (e.g., as a result of the pre-move inspection by the structure moving contractor) will also be demolished and disposed of off-site.

Demolition activities will include removal of all piers under the houses, slabs on grade, sidewalks, fences, and other ancillary structures in the camp. Demolition will also include removal of all water meters, capping of all potable water lines, removal of all septic systems (including tanks, distribution boxes, and leach fields), and backfilling of any resulting excavations.

Prior to the start of any demolition activities, identified hazardous building materials on or in the structures to be demolished will be abated and disposed of in accordance with applicable state and federal laws and regulations. These include asbestos-containing building materials, lead-based paint, and canec ceiling board (consisting of pressed sheets of sugarcane bagasse treated with arsenic to retard insect damage). Much of this abatement work will require partial demolition of the associated structures (e.g., for removal of asbestos-containing roofing). Any

hazardous building materials on or in structures to be moved that may be disturbed during the move will also be abated.

A listing of all structures currently located in the camp, including their approximate size and their intended disposition, is provided in the attached Exhibit H entitled "Identification of Camp Structures and Phases of Work".

Purpose of the Project

The purpose of the project is to comply with McBryde's legal obligations to the landowner under the PSA by removing the camp from the property BBCP has purchased from McBryde. Removal of the camp will allow BBCP to pursue its own plans for the property it acquired. It is A&B's understanding that BBCP is in the process of evaluating various options for future uses of the property and has not yet arrived at a final decision. A&B is not a party to that planning process, but what is clear is that those plans do not contemplate the continued operation and maintenance of the existing camp houses. Whatever those plans may ultimately be, they are not a part of this project.

Options Considered

Potential alternatives that have been considered include each of the following, alone or in combination:

- 1. Continued operation and upkeep of all or portions of the camp in place
- 2. Preservation of some structures in the camp (in place and/or off-site)
- 3. Full demolition of the camp
- 4. Repurposing of materials from the camp

Option 1: Continued operation and upkeep of Numila Camp was long ago deemed not to be a feasible option.

Well before McBryde ceased its sugar operations in 1996, it had been the objective of the company to eventually phase out and remove all of the old McBryde plantation camps and to foster the ability of its employees and pensioners to instead own their own homes. Land formerly occupied by the camps could then be freed up for other uses, including (at the time that the McBryde sugar plantation was still in operation) planting in sugarcane. Toward that end, significant portions of the original Numila Camp have already been removed over time. This includes the entirety of what was known as Camp 9C (formerly located below the mill and largely planted in sugarcane (now coffee) upon its removal), significant portions of Camp 9B (including almost all of the portion originally located between the current camp and the mill, now occupied by facilities utilized by the coffee operation), and several houses in Camp 9A. Concurrent with the removal of the camps, as early as the 1950's McBryde began implementing plans for new housing developments in Eleele, with priority given to making these house lots available for purchase by McBryde plantation workers and pensioners. In some cases, houses from existing plantation camps were re-located to lots within these developments. Additional developments followed in Kalaheo during the 1970's and in Eleele during the 1980's and 1990's. These later Eleele developments were intended to support the phase-out of approximately 115 remaining plantation camp dwellings housing McBryde workers and pensioners.

Aside from the ability to make lands occupied by camp housing available for other, more productive uses, a primary impetus for phasing out the old plantation camps was to reduce the costs associated with upkeep and maintenance of the camps, particularly as the camp structures and associated infrastructure continued to age. Importantly, with the cessation of sugar operations those costs were expected to increase markedly, not only due to the increased age of the camp but also because such work had historically been conducted almost exclusively using plantation personnel and other resources. Upon closure of the plantation, these resources were no longer available to conduct necessary maintenance, repairs, and improvements.

Soon after the 1996 shutdown of McBryde's sugar operations, a task force was created to, among other things, plan for the eventual removal of the last remaining camp houses at Numila. In an effort to accommodate the remaining McBryde pensioners living in the camp (to the extent feasible consistent with this objective), it was determined that a gradual phase-out of camp occupancy would be pursued as pensioners moved out of the camp or passed away, with full removal of the camp occurring thereafter. While that phase-out took far longer than anticipated, this was primarily due to the longevity of plantation workers and A&B's desire to avoid significant disruptions to the lives of its former employees and retirees rather than any lessening in the company's desire to eliminate the camp. The phase-out has now been completed with the last remaining McBryde pensioners having moved out of the camp by the end of 2022.

In keeping with the long-term plan to terminate operation of the camp, homes and other structures that have been vacated over time have not been maintained, consistent with plans for their eventual removal. As a result, many of the homes, and most if not all other structures in the camp, have deteriorated to the point where they are no longer salvageable without significant investment. Moreover, as infrastructure supporting the camp has required replacement or improvement over time, such projects have been designed and executed with the planned obsolescence of the camp in mind. For example, when large-capacity cesspools serving the camp needed to be closed in order to comply with new federal regulations, replacement wastewater systems were largely designed as an interim measure only and were constructed under a variance from the Hawaii Department of Health that substantially reduced the cost of the necessary upgrades. That variance does not allow for the re-occupancy of camp houses connected to the covered wastewater systems and will expire in early 2024. Similarly, when portions of the private potable water distribution system serving the camp were recently replaced to ensure continued adherence to state and federal drinking water standards, these improvements were not sized to accommodate continued operation of the camp, again for the purpose of minimizing the cost.

BBCP evaluated the condition of the Numila Camp during its due diligence efforts preceding the purchase of the former McBryde lands from A&B. The continued operation of the camp was deemed an unacceptable liability inconsistent with BBCP's long-term plans for the property, resulting in the sale being conditioned in part upon the removal of the camp from the property by A&B within a specified timeframe. Ownership of the structures within the camp easement area was therefore retained by McBryde rather than being transferred to BBCP.

Option 2: Preservation of some camp structures off-site is an option that has been attempted in the past and is currently being pursued by a third party (YWH).

As stated above, it had been a long-term plan of McBryde to eventually remove the Numila Camp in its entirety. As had been done with other camp removals, efforts were made by McBryde to preserve some camp structures, where feasible. Over time, such efforts have included (1) relocating some structures from closed portions of the camp (e.g., Camp 9C, the southern portion of Camp 9B) into other areas of the camp located between the mill and Halewili Road; (2) relocation of a limited number of camp houses to new, off-site housing developments for continued use by plantation workers or pensioners; (3) making homes available to the general public for re-location and re-use outside the plantation as they were vacated; and (4) re-purposing a limited number of camp houses for non-residential uses on-site.

Consistent with past practice, McBryde has made the remaining houses in Numila Camp available to outside parties, contingent upon the ability of such parties to timely remove the houses from the camp and re-locate them off-site, as required by the PSA. To date, ownership of 19 of the remaining 35 houses in the camp has been transferred to YWH, and plans are underway for moving these houses to properties YWH has access to. Relocation is contingent upon further evaluation of each structure by YWH's structure moving contractor, and it remains possible that some of these houses could be ultimately determined to be infeasible to move. Similarly, it remains possible that YWH could ultimately determine that its planned off-site uses of the camp houses are no longer feasible (e.g., due to inability to secure access to sufficient land, inability to obtain necessary permits or land use approvals, conditions affecting the economics of their proposed project, or other reasons).

The 16 houses not accepted by YWH were all inspected by another potentially interested party who, like YWH, deemed them unsuitable for relocation and refurbishment. All outbuildings in the camp are similarly unsuitable for re-location, due both to their generally poorer condition and their style of construction (i.e., "on-grade" construction that is not conducive being moved).

As already detailed above for the camp as a whole, on-site preservation of individual structures within the 16-acre camp easement area that cannot be moved off-site was rejected by the current landowner during their due diligence process for the property acquisition, and BBCP therefore did not acquire ownership of any of these structures. Over time, a limited number of camp structures located outside the easement area have been converted to various uses and these uses are anticipated to continue in the near term; BBCP is in the process of developing long-term plans for their property, including any structures located thereon. These plans are not a part of this project.

Option 3: Full demolition of all structures in the camp remains a possibility but at present is believed to be unlikely and is not the option currently being pursued.

As stated above, efforts are underway to preserve as many camp houses as practicable by relocating them off-site and refurbishing them for continued residential use. Initial assessments indicate that at least 19 houses are suitable for relocation, but that the remaining 16 houses are in an advanced state of dilapidation and are therefore infeasible to relocate off-site and/or to cost-effectively refurbish them. Similarly, all of the camp outbuildings have been determined to be unsuitable or undesirable for relocation and re-use. All camp structures that have been determined unsuitable for relocation are planned to be demolished. Additionally, some portions

of relocated houses that cannot be moved with the main structure (e.g., on-grade additions, attached carports, covered lanais) will need to be left behind when the houses are moved and will also be demolished.

While YWH and McBryde are cooperating to preserve as many camp houses as possible for reuse off-site, the ability to do so will depend upon a number of factors, including but not limited to (1) the condition of each house and whether it can be safely re-located in an intact state; (2) the extent of repairs and renovations necessary to allow the house to be re-occupied and whether or not such repairs and renovations can be completed in a cost-effective manner; (3) the likely market for the house after re-location and whether the value of the renovated house will be sufficient to cover the costs of relocation and refurbishment; (4) the ability to obtain ownership or control of suitable re-location sites; (5) the ability to obtain all necessary permits and approvals for the relocation sites; (6) the availability of sufficient financing to complete the relocations as planned. In the event that YWH is unable to overcome one or more of these obstacles, making the relocation of one or more houses infeasible, such houses will instead be demolished with the remainder of the camp structures.

Option 4: Re-purposing of materials from the camp is an option that may be possible, with appropriate controls and limitations.

It is anticipated that, regardless of the condition of the structure as a whole, portions of some buildings planned to be demolished may be suitable for re-use in existing buildings, as part of new construction, or to replace deteriorated or missing components of buildings being re-located. Subject to certain limitations, McBryde is willing to consider allowing re-purposing of building materials from the camp, with priority being given to YWH in support of their re-location and refurbishment efforts. However, for liability reasons access to the camp to recover building materials for re-purposing would need to be strictly controlled and would likely be limited to licensed contractors engaged by either McBryde or YWH. Broader access to the camp for recovery of materials would be too difficult to manage in light of potential liabilities associated with the condition of the structures, the presence of hazardous materials, and construction and environmental remediation activities that would be ongoing at the site. Any removal of building materials from camp structures for re-purposing would need to be conducted in strict accordance with state and federal regulations applicable to asbestos, lead-based paint, and other hazardous building materials.

Brief History of McBryde Sugar Company

McBryde Sugar Company was formed in 1899 from the lands of the McBryde Estate (organized as the McBryde Estate, Ltd. from the estate of Judge Duncan McBryde with his six children as stockholders) and the Eleele Plantation, combined with all of the capital stock of the Koloa Agricultural Company (which had been purchased by the McBryde Estate). The resulting enterprise controlled lands stretching from Eleele to Koloa, with Koloa Agricultural Company contributing 2,571 acres of land (part of it in cane), Eleele Plantation contributing 1,120 acres of land (some of it in sugarcane) and a small mill at Eleele, and the McBryde Estate contributing the balance of the plantation.

The mill at Eleele was adequately sized for the small area of cane that had been farmed by the Eleele Plantation, and the cane produced on the Koloa Agricultural Company land – during the short time that it existed as an independent enterprise - was processed under a contract with the Koloa Sugar Company. It was apparent, however, that with the addition of the McBryde Estate lands a much larger mill would be needed to process the cane from the new plantation. Fortunately for McBryde, a new mill had been ordered by the American Sugar Company on Molokai, and that mill became available when that plantation failed before its first crop could be harvested. McBryde purchased the mill and in 1901 set about installing it to replace the Eleele mill. McBryde's "New Mill", and the plantation camp built around it, came to be known as "Numila", supposedly in deference to how "New Mill" was pronounced by the plantation's immigrant workers.

Some noteworthy events in the history of McBryde Sugar Company, Ltd. include the following:

- Asakichi and Moyo Inouye emigrate from Japan. The couple would work at McBryde Sugar Company for 25 years, living in Wahiawa Camps 2 and 3. Their grandson, Daniel K. Inouye, was to become a Medal of Honor recipient for his heroism during World War II, Hawaii's first United States Representative, and a United States Senator representing Hawaii for 50 years.
- 1905 Kauai Electric Company, Ltd. is incorporated for purposes of constructing a hydroelectric plant at Wainiha. Full ownership of the company was later assumed by McBryde.
- 1906 Construction of the Wainiha Hydroelectric Plant is completed, and the plant begins generating electrical power for pumping stations needed to irrigate the McBryde sugarcane crop. The plant has now been supplying renewable electrical power to the island of Kauai for well over a century.
- 1909 Alexander & Baldwin, Inc. takes over from Theo H. Davies & Company as agent for McBryde.
- McBryde installs new boilers at Numila and constructs a new, 249-feet high reinforced concrete smokestack. At the time, it was the largest smokestack in the islands, and it became a source of pride for the camp residents and a prominent landmark used for navigation by fisherman.
- 1932 McBryde completes construction of the Alexander Dam.
- 1957 Construction of McBryde's new Administration Building at Numila is completed.
- 1968 McBryde becomes a wholly owned subsidiary of A&B.
- 1974 McBryde begins leasing land and the Koloa Sugar Mill from Grove Farm Company, more than doubling the number of acres under cultivation from about 6,000 to over 13,000 and making McBryde the eighth largest sugar producer in the state. Upon shifting its sugar milling operations to Koloa, McBryde permanently shuts down its "New Mill", though it maintains its administrative offices and some agricultural support operations at Numila. Parts of the Numila mill are transferred to Koloa as part of an \$8 million expansion and improvement of the Koloa Mill.
- Hurricane Iwa strikes Kauai, damaging McBryde's sugarcane fields and prompting expansion into other crops, including coffee and macadamia nuts. By 1984, macadamia nut orchards are planted along the highway above Numila.
- 1987 McBryde forms Island Coffee Company as a joint venture between McBryde subsidiary McBryde Farms, Inc. and Hills Brothers Coffee.
- 1989 McBryde produces 54,559 tons of sugar, a record for the plantation.

- 1991 Due to ongoing deterioration, the New Mill smokestack is torn down.
- Hurricane Iniki strikes Kauai, causing substantial damage throughout the island, including to McBryde's sugarcane crop and macadamia nut plantings. McBryde begins expanding coffee plantings shortly thereafter. McBryde's financial losses exceed \$20 million.
- 1993 Hills Brothers terminates their involvement in Island Coffee Company.
- 1994 Kauai Coffee is introduced as the brand of coffee produced by Island Coffee Company.
- 1996 McBryde permanently shuts down its sugar operations.
- 1997 Island Coffee Company changes its name to Kauai Coffee Company. In addition to continuing and expanding coffee operations on the McBryde lands, Kauai Coffee Company assumes operation of McBryde's power production and water supply infrastructure.
- 2011 Kauai Coffee Company is sold to Massimo Zanetti Beverage USA (MZB). All of McBryde's land holdings are retained by A&B, and approximately 3,000 acres of coffee fields, along with the coffee processing and agricultural support facilities at Numila, are leased to MZB. As part of the lease, Kauai Coffee Company is given permission to utilize a limited number of houses in Numila Camp for temporary farm worker housing until such time as the remainder of the camp has been vacated. A&B forms McBryde Resources, Inc. to administer the lease and to continue operation of the former McBryde Sugar Company power and water infrastructure.
- 2022 McBryde Sugar Company's lands, along with the McBryde Resources operations, are sold to BBCP Kauai Operating, LLC. The sale includes the land at Numila, but A&B retains ownership of all camp structures within a 16-acre easement area and assumes an obligation to remove the camp.

Brief History of Numila Camp

The camp around the new McBryde Mill, one of at least eighteen camps that existed at one time or another across the plantation, was officially known as Camp 9 or "Mill Camp". As described above, the existing camp is arrayed along a main road running roughly north to south along with three side roads running to the west from the main road. The original camp was quite different and evolved into the current configuration over a period of more than 60 years. Under the current configuration, only the area known as Camp 9A (located along and largely to the east of the main road) and a portion of the area known as Camp 9B (located mauka of the mill and to the west of the main road) still exist. Based on the maps available for review, Camp 9C, which was located makai of the mill, had been completely removed by about 1960.

Records indicate that the houses along the main road (Camp 9A, also known as "Haole Camp") were reserved for skilled labor and lunas. This is reflected by the fact that the oldest of the remaining houses in Camp 9A (house numbers 164, 165, 166, 171, and 173) are generally much larger than those in the rest of the camp (houses at the south end of Camp 9A are not original and are somewhat smaller). Camps 9B and 9C housed laborers, and most of the early inhabitants would have worked in the "New Mill". Camp 9B, located above the mill to the west of the main road, was comprised of "Japanese Camp" and "Filipino Camp". Camp 9C, located to the south of the mill, was known as "Portuguese Camp" and also housed workers of Spanish and Puerto Rican ethnicity.

Consistent with practice at other sugar plantations in Hawaii, the camp houses were constructed in house using plantation labor and resources. According to McBryde annual reports, during the 1930's the Carpentry Department employed up to 55 laborers, including carpenters, painters, plumbers, and pest control operators with duties that included construction of new houses, garages, and wash houses, making additions to existing dwellings, repairs and maintenance, termite inspection and treatment, painting, and demolition of termite-ridden houses.

In addition to the dwellings and related outbuildings and the McBryde Sugar Company office building, Numila Camp at various times included a camp store and associated warehouse (the larger "company store" being located in Eleele), a gasoline service station, a movie theater, a pool hall/club house, a bath house, a barber shop, a clinic, a credit union, and at least one church. For recreation, tennis courts were provided along the main road within Haole Camp and around 1940 a park with athletic fields and a basketball court was constructed in a former cane field to the west of the camp (where the Kauai Coffee Company Visitor Center is now located).

The earliest available map, a 1901 map of McBryde Sugar Company lands "showing approximate location of cane fields & improvements", depicts New Mill with a small number of apparent camp houses located just below the "Plantation Railway" at the mill in the area that was later referred to as Camp 9C. Thus, it appears that the initial construction of the mill camp likely coincided approximately with the construction of the mill. A 1910 topographic map shows Camp 9C greatly expanded, Camp 9A in something approximating its modern configuration, and Camp 9B limited to the area between the mill and the southernmost of the three present-day side roads. A later (1914) map does not show the camp but does depict the mill with the original McBryde office building (later replaced) located across the main road. Available maps and aerial photos from the 1930's through the 1980's document an initial expansion of Camp 9C (through about 1937) followed by gradual removal of all houses in Camp 9C by 1960, expansion of Camp 9B northward towards Halewili Road through the 1950's, and removal of most of the Camp 9B dwellings formerly located between the present-day camp and the mill. Available records indicate that in addition to new construction, some of the houses formerly located in Camp 9C and/or in the southernmost portion of Camp 9B were re-located to the northward expansion area of Camp 9B (as a result, some houses in the camp may be older than they might be guessed based solely upon when they first appeared within Camps9A or 9B). In addition, in 1957 the current Administration Building was constructed (replacing the original mill office building) and a few of the houses at the southernmost end of Camp 9A were either permanently removed to make way for the new office building or replaced with new or relocated houses. By 1959, it appears that the addition or relocation of houses in the camp had stopped; this coincides with the development and sale of new housing for plantation workers in Eleele and Kalaheo.

Over the ensuing decades to the present, houses were sporadically removed from the camp. Following the closure of the New Mill in 1974 in particular the camp reportedly began a rapid decline and began disappearing as a community. By the time McBryde closed down its sugar operations entirely in 1996 only 47 houses remained in the camp (six of which were vacant and slated for demolition). Additional houses have been removed since then, including two which were moved and renovated in 1997-1998 to create the current Kauai Coffee Company Visitor Center. By 2003, only the 35 houses which remain in the camp today were extant.

Camp Occupants

The camp is known to have housed employees who worked at the mill and surrounding facilities, which would have included a mixture of skilled workers, semi-skilled workers, and overseers/supervisors ("lunas"). Given the size of the camp relative to the number of workers needed to operate the mill, however, portions of the camp may also have been occupied by unskilled laborers (i.e., field workers). The ethnicity of camp occupants is discussed above; however, during the period from 1920 to 1940 segregation of camp housing on the plantations began to be phased out, and by 1940 plantation camp populations were largely mixed.

While detailed records of the population of Numila Camp over time are not available, a document entitled "House to House Count of All Camps McB.S.Co. Oct. 1940" indicates that at that time there were 88 dwellings of various sizes in Camp 9B and 75 in Camp 9C, with approximate populations of around 329 and 307 persons, respectively. At about that time, there were also 22 dwellings in Camp 9A. Given the Camp 9A houses were reserved for lunas/skilled labor, they were likely all or mostly single-family dwellings with relatively smaller numbers of inhabitants per house than might be found in the semi-skilled laborer housing that comprised camps 9B and 9C (averaging four to five persons per house, with sometimes as many as 12 persons in a single house). Thus, the camp population in 1940 could reasonably be estimated to be in the range of 700-750 persons. It seems likely that the population of the camp would have peaked by around this time, due to the ensuing war years and the company's policy through the 1950's, when the number of dwelling units depicted in camp maps appears to have been at or near its highest, of making efforts to encourage company employees to acquire and own their own housing.

The remaining occupied houses in the camp when McBryde ceased sugar operations in 1996 almost exclusively housed McBryde retirees and their spouses, and the camp population is estimated to have been no more than about 80 residents. By 2003, the full-time camp population (i.e., excluding seasonal farm laborers working for Kauai Coffee Company on a temporary basis during the coffee harvest) was only 50, and the population was further reduced to 30 by 2008, to 23 by 2013, and to 14 by 2018. At the end of 2021, there remained only 11 residents occupying six camp houses, all of whom had moved out by the end of 2022. The use of camp houses by Kauai Coffee Company for temporary farm worker housing was terminated by April 2023, and the camp has been completely unoccupied since that time.

Little information could be located regarding the identities of camp occupants and whether any notable persons may have once lived in Numila Camp. While two of Hawaii's most revered politicians (the late Senators Daniel K. Inouye and Masayuki "Spark" Matsunaga) have roots at McBryde Sugar Company, neither family is known to have lived at Numila (Senator Inouye's grandparents lived at Wahiawa Camp 2 before moving to Honolulu, while Senator Matsunaga was born at Kukui'ula Camp 18 and lived there until his family moved to Hanapepe town). Limited records of camp occupants during the 1940's contain only last names. In Camp 9A, some of these occupants shared the same surname with people who held or would hold leadership positions at McBryde and/or A&B (e.g., "Scott", "Morgan", and "Waterhouse", the latter also being the surname of a physician who once served as company doctor for McBryde). However, there is insufficient information in the available records to fully identify any of these

former camp residents. In any case, each of the residences for which available records correlate to these surnames is no longer present in the camp.

Architecture of Camp Houses

The 35 houses that remain in the camp are all of a similar design with many shared features typical of plantation houses throughout the Hawaiian Islands, including:

- Single-story, utilitarian design;
- Relatively small in size, generally between 900 and 1,100 square feet (exceptions are five houses along the main road which were likely intended to be occupied by either lunas or skilled labor and are therefore larger in size);
- Post and pier construction elevating the house above the ground;
- Single-wall construction with board and batten or tongue and groove exterior siding;
- Canec utilized throughout for interior ceilings in most houses;
- Double-hung windows;
- Exterior lanais, most often located in a front corner of the house;
- Gabled or hipped roofs with generous overhangs;
- Most roofs are of corrugated metal, though a few are of rolled asphalt sheeting;
- Most houses have a detached garage and laundry house, or else share a combined garage/laundry house structure with an adjacent house.

Building Plans

Given the relatively small number of houses left in the camp, a surprising number of different building layouts are found in the Numila Camp houses, as opposed to just a few repeated and/or reverse floor plans having been used throughout the camp. Even accounting for the fact that some camp houses were likely added to or otherwise renovated over time, there appear to be no less than 20 different floor plans among the 35 remaining camp houses. Additionally, there appear to be at least ten variations upon these basic floor plans found in the camp (i.e., slight variations in size or configuration, or "flipped" floor plans); only a handful of houses share identical floor plans. This can be attributed in part to the fact that Numila Camp was constructed in multiple phases over a period of more than 50 years. Nevertheless, many of the houses in Camp 9B, along with the newer, smaller houses in Camp 9A, appear to follow the general layout of standardized plans for plantation housing developed by the Hawaiian Sugar Planters' Association (HSPA)¹ so, at minimum, these plans may have been used as a starting point for the McBryde houses.

The largest of the Camp 9A houses (numbers 152, 171, 173, 164, 165, and 166) all have floor plans that differ markedly (in size and/or in general layout) from the remainder of the camp. Much of the camp was built to house semi-skilled or unskilled laborers, while the houses in

¹ During the period from 1910 to 1920, and in response to concerns about worker social welfare and disease outbreaks, HSPA began developing standardized plans to be used for plantation housing throughout the islands. Among the earliest of these was a "cottage for one family" plan, developed in 1920, which was generally smaller than the houses at Numila (500 to 600 square feet) and included two bedrooms, a living room, a kitchen, and a lanai but no bathroom (see Exhibit I-1). By 1935, HSPA hired island architect Theodore A. Vierra to update the earlier plans with a larger, three-bedroom design (around 1,100 square feet) that also included toilets, showers, and other improvements (see Exhibit I-2). Many of the remaining houses in Numila Camp appear to follow the general layout of the Vierra plans, supporting estimated construction dates of 1935 or later. Interestingly, McBryde later hired Vierra to provide designs for employee-owned housing to be built in its Eleele developments.

Camp 9A were intended to be occupied by skilled labor and/or lunas, who generally would have been provided with larger houses.

As of the date of this document, no building plans could be located for any of the structures (past or present) in Numila Camp. To provide historical documentation of houses that are planned for demolition, McBryde intends to prepare building plans (floor plans and exterior elevations) for a limited number of houses in the camp. In light of the number of plans that would need to be created in order to document every remaining house in the camp individually (or even every house that is to be demolished rather than re-purposed), McBryde intends to prepare plans that will be more or less representative of the camp as a whole (i.e., representing the different classes of housing in Camps 9A and 9B, the major phases of construction, and the differing numbers of bedrooms). Specifically, plans will be created for at least one smaller (two bedroom) house, at least one larger (three or more bedroom) house, at least one Camp 9A "luna" house, at least one Camp 9B laborer house, and at least one house each from the early/original construction phase (1920's or earlier), from the Camp 9B expansion in the 1930's, and from the final camp construction phase in the 1950's. This should be achievable by preparing a total of four sets of plans, which corresponds to 11 percent of all remaining camp houses and 25 percent of those currently planned for demolition.

Dates of Construction

The attached Exhibit H entitled "Identification of Camp Structures and Phases of Work" provides an estimated date of construction for each of the remaining 35 camp houses, as determined primarily based upon a review of available aerial photos and camp maps depicting the layout of the camp over time. It should be noted that dates of construction were estimated based upon the year that a particular house first appeared on one of the aerial photos or maps. Because some houses are thought to have been relocated from other areas of the camp, it is possible that some houses were constructed earlier than estimated.

A 1925 census of plantation camps by HSPA indicates that none of the 929 housing units then present at McBryde had inside toilets or private baths. Thus, with two possible exceptions (see below) none of the existing houses in the camp appear to have been constructed prior to 1925.

Exceptions to the above include two houses, numbers 82 and 83, which adhere more closely to the layout of the 1920 standardized plans (albeit slightly larger in size). Specifically, the restrooms in both of these houses appear to have been added on later rather than being incorporated into the original floor plan. Thus, these two houses are believed to have been constructed prior to 1935. The presence of canec throughout these two houses further helps to date them, since canec was not widely utilized as a construction material prior to 1920.

Many of the houses in the camp appear to generally follow the layout in standard housing plans developed by HSPA for semi-skilled labor plantation housing in 1935. This suggests an estimated construction date of 1935 or later for these houses. Further, the only existing camp houses listed in the "House to House Count" document referenced above are numbers 82, 83, 90, and 91; the rest of the existing houses in Camp 9B therefore date to no earlier than October 1940. Unfortunately, the "House to House Count" document does not cover Camp 9A.

Other deviations from the HSPA standard floor plans can be found in some of the larger houses in Camp 9A (e.g., numbers 152, 164, 165, 166). As noted previously, these houses were occupied by lunas/skilled labor, and it is therefore perhaps not surprising that they did not follow the standard design of housing for unskilled or semi-skilled labor. While some of the earliest maps of the camp (1900-1910) show houses coinciding with the locations of house numbers 164-165, all three of these houses have bathrooms that appear to have been incorporated into the original floor plan, suggesting that they may not be the original houses at these locations and may instead have been constructed after 1925. House number 152 is among the houses in the lower portion of Camp 9A that appear to have been built around the time that the new McBryde administration building was constructed in 1957.

No effort has been made to estimate the dates of construction of outbuildings, since they do not reliably appear on the camp maps and aerial photos and have undergone significant modifications/additions. It is of course reasonable to assume that garages and wash houses associated with a given dwelling were constructed no earlier than the dwelling itself. Beyond that, exterior wash houses remained common in plantation camps through 1960, and garages were found in plantation camps beginning in the period 1920 to 1940, making both types of structures difficult to date.

EXHIBITS

Exhibit A – Project Location Map

Exhibit B – Project Boundaries Map

Exhibit C - McBryde Sugar Company Map "Camps 9A & 9B" (1975), Proposed Action

Exhibit D – McBryde Sugar Company Map "Camps 9A & 9B" (1975), Current Condition

Exhibit E-1 – Aerial Survey Map (May 2023), Existing Conditions

Exhibit E-2 – Aerial Survey Map (May 2023), Proposed Disposition of Houses

(Demolition/Relocation)

Exhibit E-3 – Aerial Survey Map (May 2023), Future Conditions

Exhibit F – Land Use Map, Numila Camp and Vicinity

Exhibit G-1 – Proposed YWH Relocation Sites for Numila Camp Houses (Koloa)

Exhibit G-2 – Proposed YWH Relocation Sites for Numila Camp Houses (Kapaa)

Exhibit G-2 – Proposed YWH Relocation Sites for Numila Camp Houses (Wailua)

Exhibit H – Identification of Camp Structures and Phases of Work

Exhibit I-1 – HSPA Plans – Single-Family Cottage (1920)

Exhibit I-2 – HSPA Plans – Semi-Skilled Worker Cottage (1935)

EXHIBITS (continued)

Exhibit J-1 – Map of McBryde Sugar Company's Lands, Koloa District (July 1901)

(Showing New Mill and Camp 9C houses below the mill)

Exhibit J-2 - Excerpt from USGS Kauai Topographic Map, Hanapepe Quadrangle (1910)

(Showing "McBryde Plantation Mill", Camp 9A, original section of Camp 9B, Camp 9C)

Exhibit J-3 - McBryde Sugar Company Mill Camps 9A, 9B, 9C (1935)

Exhibit J-4 - McBryde Sugar Company Mill Camps 9A, 9B, 9C (1937)

Exhibit J-5 - McBryde Sugar Company Mill Camps 9A, 9B, 9C (1947)

Exhibit J-6 - McBryde Sugar Company Mill Camps 9A, 9B (1960, rev, to 1975)

Exhibit J-7 - McBryde Sugar Company Mill Camps Aerial Photo (1953)

(Showing planned expansion of Camp 9B)

Exhibit J-8 - McBryde Sugar Company Mill Camps Aerial Photo (circa 1986)

Exhibit K – Camp Photographs

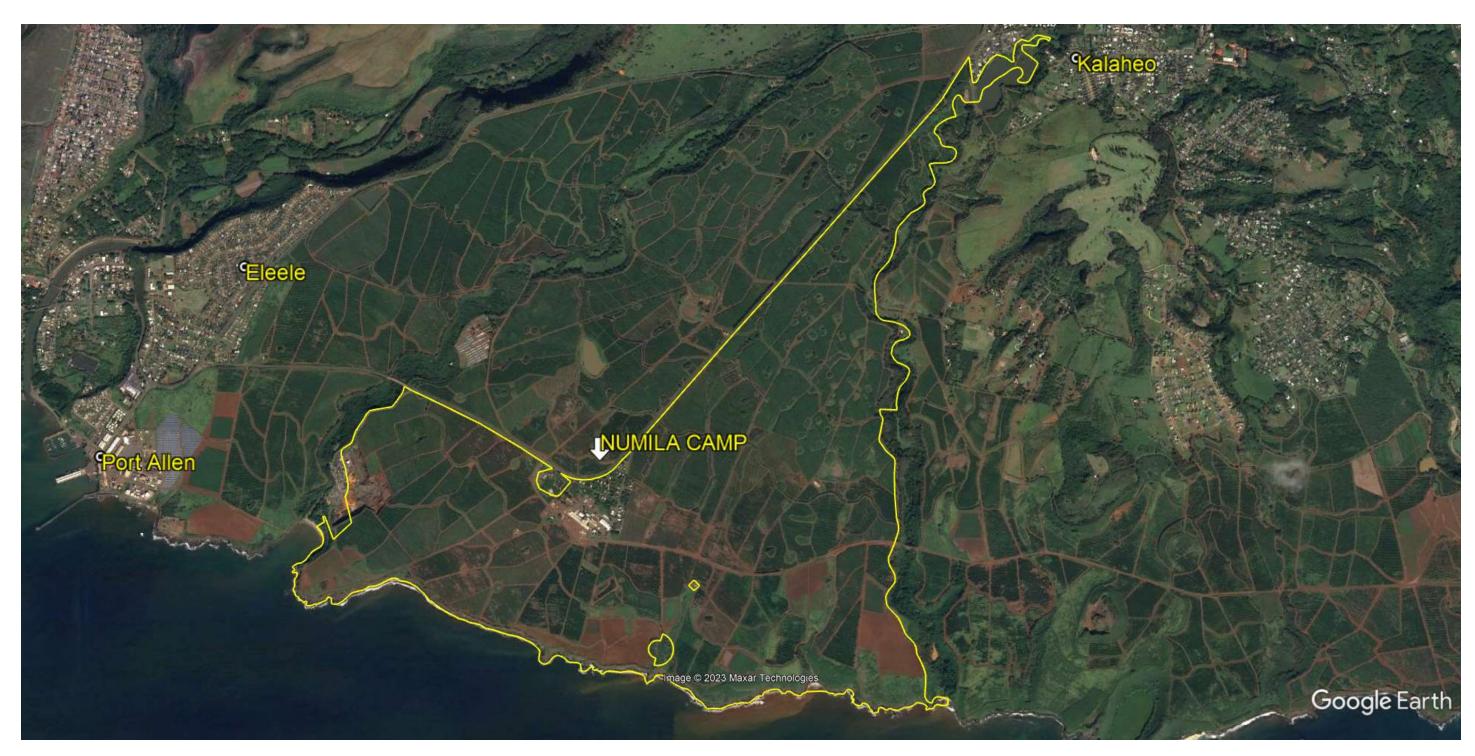


EXHIBIT A – Project Location Map

Numila Camp (Camp 9A/9B)

Island of Kauai

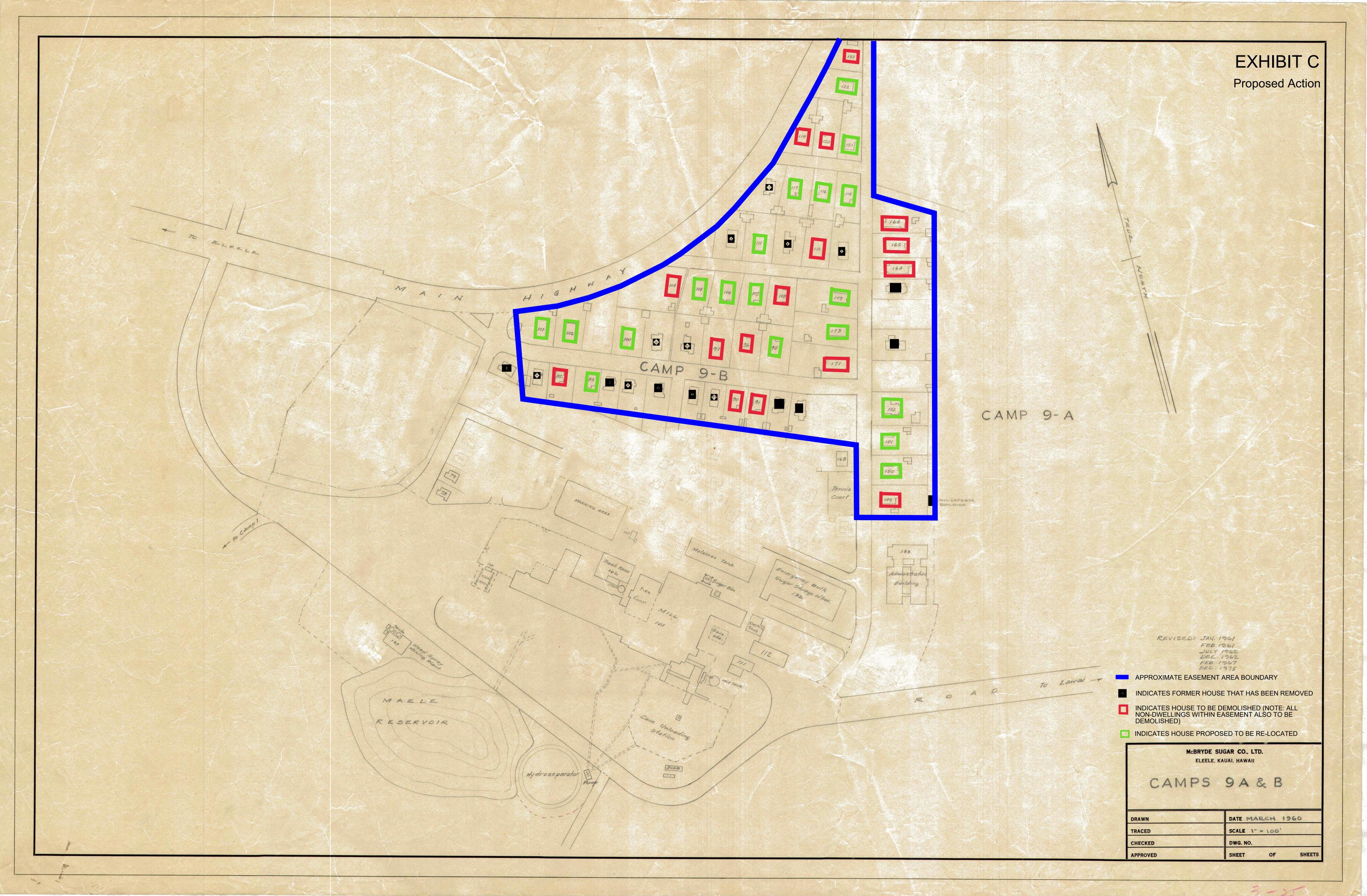
TMK Number (4) 2-2-001:001

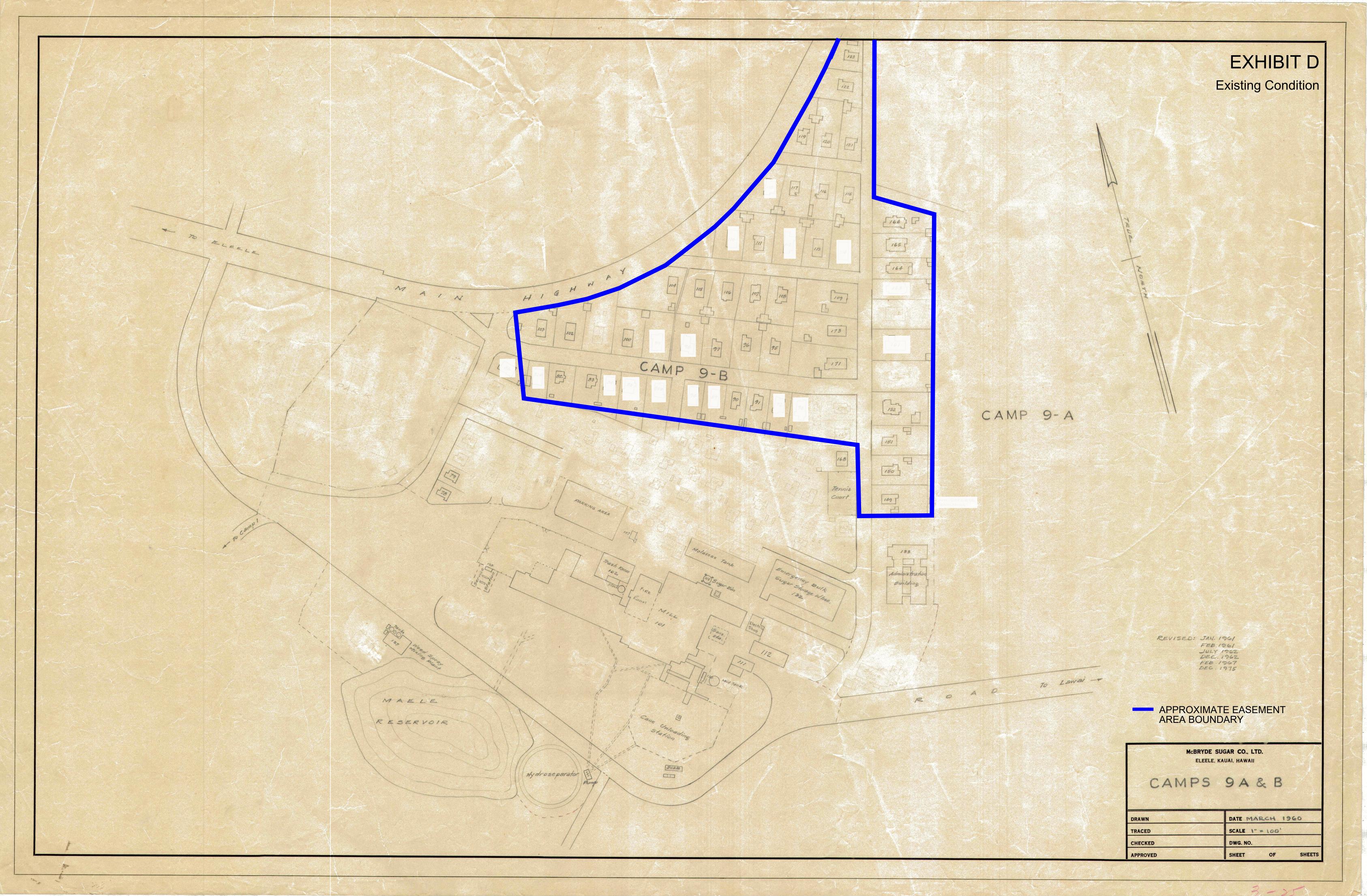


EXHIBIT B - Project Boundaries Map

Numila Camp Easement Area
Red line defines limits of project area.

TMK Number (4) 2-2-001:001











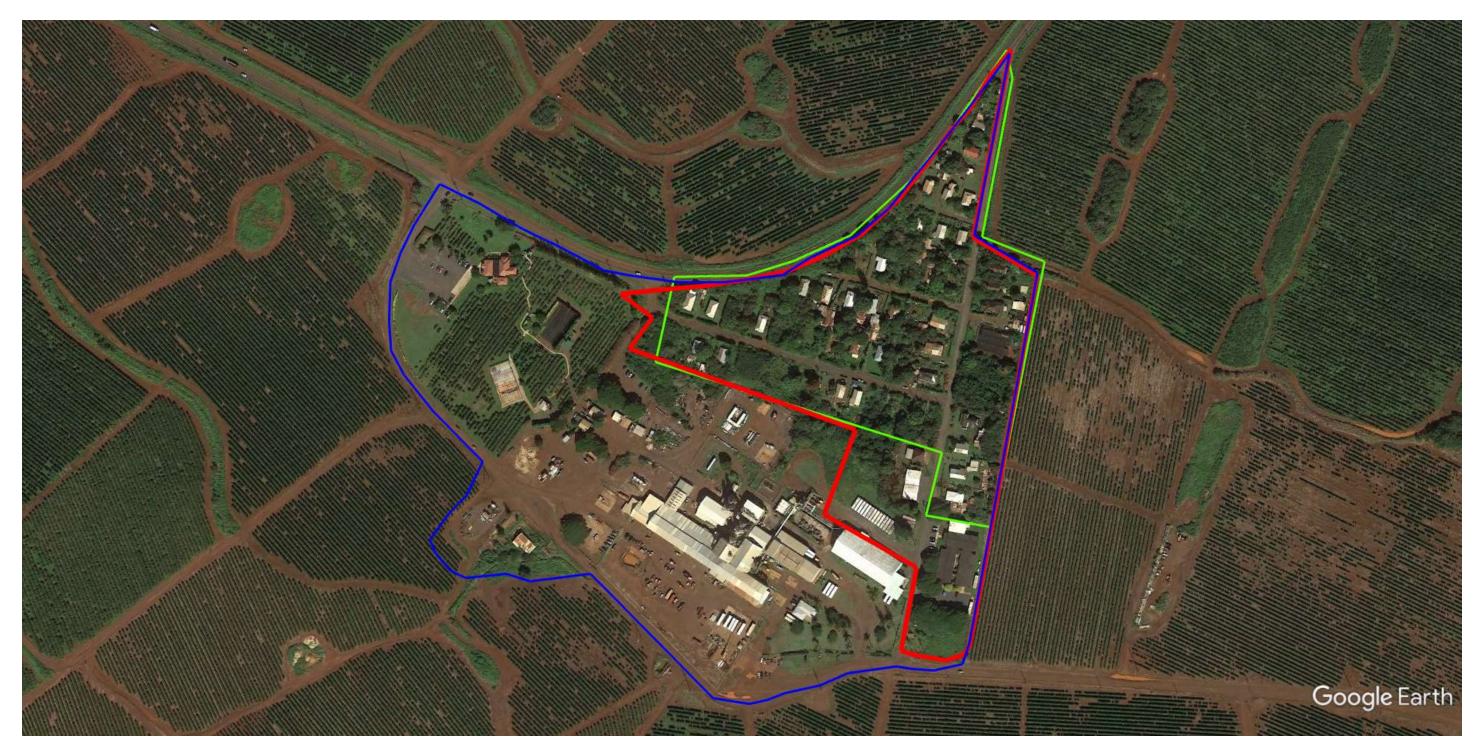


EXHIBIT F - Land Use Map, Numila Camp and Vicinity

Blue Line = State Land Use Urban District Boundary
Red Line = County of Kauai Plantation Camp Zoning District Boundary
(Remainder of area shown is within the Agricultural Land Use/Zoning Districts.)

Green Line = Project Area

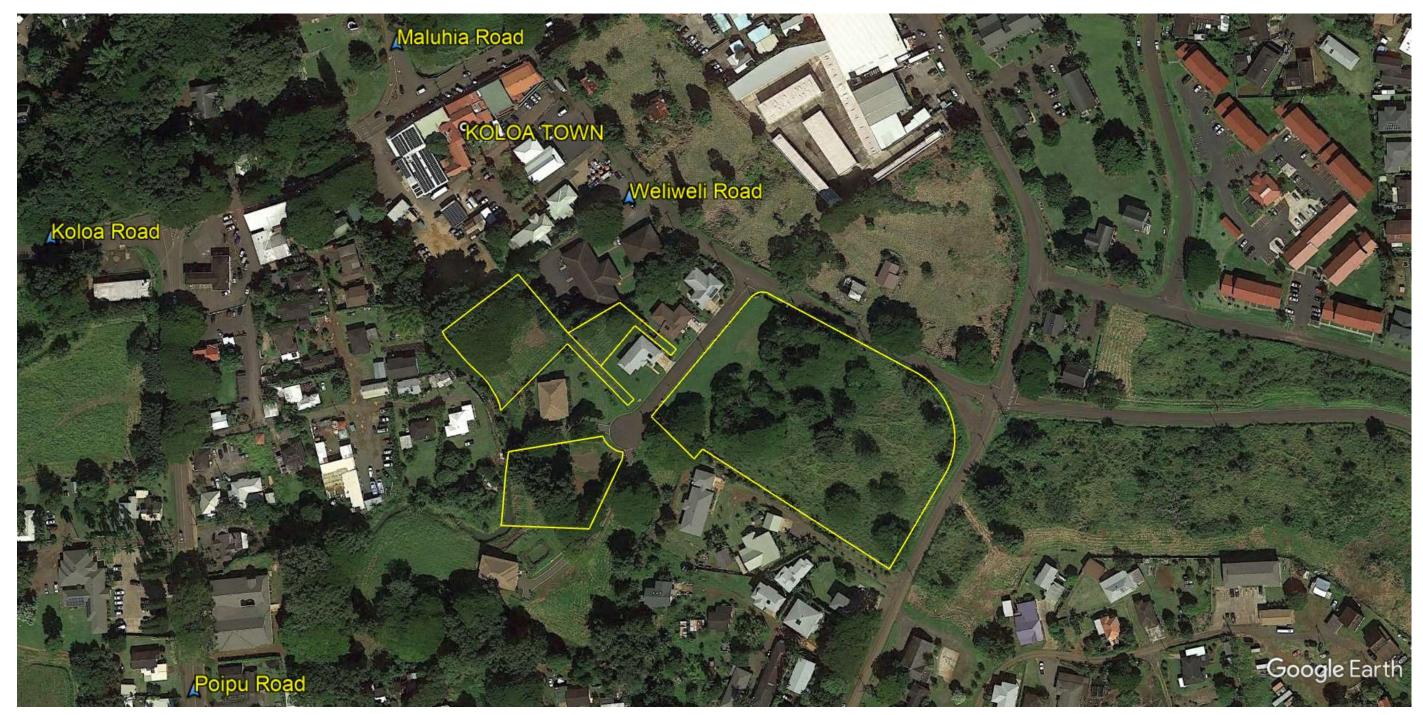


EXHIBIT G-1 – Proposed Your Way Home, LLC Relocation Sites for Numila Camp Houses (Koloa) Proposed locations in Koloa Town for up to 18 of 19 camp houses to be relocated (lots listed clockwise from bottom). TMK No. (4) 2-8-009:001-0011 Creekside Estates Condominium, Unit 1 (0.6073 acres); planned for up to six houses TMK No. (4) 2-8-009:001-0014 Creekside Estates Condominium, Unit 4 (0.7803 acres); planned for up to five houses TMK No. (4) 2-8-009:001-0015 Creekside Estates Condominium, Unit 5 (0.1671 acres); planned for up to two houses TMK No. (4) 2-8-009:001-0019 Creekside Estates Condominium, Unit 9 (3.545 acres); planned for up to five houses



EXHIBIT G-2 – Proposed Your Way Home, LLC Relocation Site for Numila Camp Houses (Kapaa)

Proposed location in Kapaa for one of 19 camp houses to be relocated.

TMK No. (4) 4-6-007:041 (1.156 acres); planned for one house



EXHIBIT G-3 – Proposed Your Way Home, LLC Relocation Sites for Numila Camp Houses (Wailua)

Proposed location in Wailua for up to three of 19 camp houses to be relocated.

TMK No. (4) 4-1-008:109-0001, 0002, and 0003 (0.5222 acres); three-unit condominium planned for up to one house per unit

Exhibit H – Identification of Camp Structures and Phases of Work (Rev. 11/1/2023)					
House/Lot	Description	Phase of Work			
Number	(Approximate date of construction)				
82	House (2BR/1B), approximately 809 square feet (1901-1935; likely 1920 or later)	Demo			
82	Laundry house/shed structure with overhangs,	Demo			
	approximately 400 square feet				
82	Chicken coop complex	Demo (No Permit)			
83	House (3BR/2B), approximately 993 square feet (1901-1935; likely 1920 or later)	Move - YWH			
83	Garage/carport, approximately 400 square feet	Demo			
83	Laundry house/shack,	Demo (No Permit)			
	approximately 200 square feet				
83	Laundry/shower/storage,	Demo (No Permit)			
	approximately 170 square feet				
84	Laundry house on vacant lot,	Demo (No Permit)			
	approximately 100 square feet				
90	House (2BR/2B), approximately 976 square feet (1935-1937)	Demo			
90	Double laundry house,	Demo (No Permit)			
	approximately 100 square feet				
91	House (3BR/1B), approximately 1,074 square feet (1935-1937)	Demo			
91	Garages/shed, approximately 515 square feet	Demo			
92	Shed on vacant lot,	Demo (No Permit)			
	approximately 120 square feet				
92	Shed on vacant lot,	Demo			
	approximately 340 square feet				
95	House (3BR/2B), approximately 932 square feet (1941-1947)	Move - YWH			
95	Double garage, approximately 580 square feet	Demo			
96	House (3BR/2B), approximately 932 square feet (1941-1947)	Demo			
96	Shed, approximately 320 square feet	Demo			
97	House (3BR/2B), approximately 1,032 square feet (1941-1947)	Demo			
97	Garage/large shed, approximately 1,890 square feet	Demo			
97/98	Chicken coop complex, including on adjoining vacant lot	Demo (No Permit)			

Exhibit H – Identification of Camp Structures and Phases of Work (Rev. 11/1/2023)					
House/Lot	Description	Phase of Work			
Number	(Approximate date of construction)				
100	House (3BR/2B), approximately 1,154 square feet (1953-1959)	Move - YWH			
100	Double garage, approximately 400 square feet	Demo			
100	Laundry house, approximately 70 square feet	Demo (No Permit)			
100	Collapsed shack, approximately 100 square feet	Demo (No Permit)			
101	Collapsed shack on vacant lot, approximately 40 square feet	Demo (No Permit)			
102	House (3BR/1B), approximately 888 square feet (1953-1959)	Move - YWH			
102	Laundry house, approximately 70 square feet	Demo (No Permit)			
103	House (3BR/2B), approximately 1,154 square feet (1953-1959)	Move - YWH			
103	Lanai/porch, approximately 250 square feet	Demo			
103	Garage/laundry, approximately 370 square feet	Demo			
103	Pre-fab garden shed, 120 square feet	Demo (No Permit)			
104	House (3BR/2B), approximately 1,104 square feet (1953-1959)	Demo			
104	Garage/laundry, approximately 260 square feet	Demo			
105	House (3BR/2B), approximately 1,104 square feet (1953-1959)	Move - YWH			
105	Garage complex, approximately 1120 square feet	Demo			
105	Shed, approximately 65 square feet	Demo (No Permit)			
105	Shed, approximately 120 square feet	Demo (No Permit)			
106	House (3BR/2B), approximately 1,104 square feet (1953-1959)	Move - YWH			
106	Shack, approximately 70 square feet	Demo (No Permit)			
107	House (3BR/2B), approximately 1,102 square feet (1953-1959)	Move - YWH			
107	Cottage/shed, approximately 865 square feet	Demo			
107	Covered lanai area, approximately 680 square feet	Demo			
107	Assorted chicken coops	Demo (No Permit)			
108	House (2BR/2B), approximately 924 square feet (1953-1959)	Demo			
108	Garage complex, approximately 1720 square feet	Demo			
109	House (3BR/2B), approximately 1,147 square feet (1953-1959)	Move - YWH			
109	Garage complex, approximately 800 square feet	Demo			

	Exhibit H – Identification of Camp Structures and Phases of Work (Rev. 11/1/2023)					
House/Lot	Description	Phase of Work				
Number	(Approximate date of construction)					
111	House (2BR/2B), approximately 908 square feet (1953-1959)	Move - YWH				
111	Garage with lean-to,	Demo				
	approximately 960 square feet					
111	Shed, approximately 100 square feet	Demo (No Permit)				
111	Assorted chicken coops	Demo (No Permit)				
113	House (3BR/2B), approximately 1,104 square feet (1953-1959)	Demo				
113	Garage, approximately 570 square feet	Demo				
113	Garage overhang, approximately 720 square feet	Demo				
113	Shed, approximately 110 square feet	Demo (No Permit)				
113	Covered area behind house, approximately 700 square feet	Demo				
115	House (2BR/2B), approximately 907 square feet	Move - YWH				
115	Garage complex, approximately 1000 square feet	Demo				
115	Assorted chicken coops	Demo (No Permit)				
116	House (3BR/2B), approximately 920 square feet (1953-1959)	Move - YWH				
116	Garage/storage, approximately 625 square feet	Demo				
116	Work shop, approximately 210 square feet	Demo				
116	Open area under roof, approximately 120 square feet	Demo (No Permit)				
117	House (2BR/2B), approximately 811 square feet (1953-1959)	Move - YWH				
117	Garage/laundry, approximately 540 square feet	Demo				
119	House (2BR/2B), approximately 913 square feet (1953-1959)	Demo				
119	Garage/shed, approximately 670 square feet	Demo				
119	Open car port, approximately 300 square feet	Demo				
119	Dog kennel	Demo (No Permit)				
120	House (3BR/2B), approximately 993 square feet (1953-1959)	Demo				
120	Garage/lanai, approximately 563 square feet	Demo				
120	Assorted chicken coops/kennels	Demo (No Permit)				
121	House (2BR/2B), approximately 956 square feet (1953-1959)	Move - YWH				

Exhibit H – Identification of Camp Structures and Phases of Work (Rev. 11/1/2023)				
House/Lot	Description	Phase of Work		
Number	(Approximate date of construction)			
121	Garage/shed, approximately 270 square feet	Demo		
122	House (3BR/2B), approximately 1,032 square feet (1953-1959)	Move - YWH		
123	House (2BR/2B), approximately 908 square feet (1953-1959)	Demo		
123	Garage/shed, approximately 560 square feet	Demo		
123	Shack, approximately 168 square feet	Demo (No Permit)		
149	House (3BR/2B), approximately 1,172 square feet	Demo		
149	Attached carport/garage/shed, approximately 1260 square feet	Demo		
149	Shed, approximately 135 square feet	Demo (No Permit)		
149	Shed, approximately 200 square feet	Demo (No Permit)		
150	House (3BR/2B), approximately 1,078 square feet (1953-1959)	Move - YWH		
150	Garage/laundry/shed, approximately 620 square feet	Demo		
151	House (2BR/2B), approximately 920 square feet	Move - YWH		
151	Garage complex, approximately 1130 square feet	Demo		
152	House (3BR/1B), approximately 1,296 square feet	Move - YWH		
152	Garage/shed in trees on adjacent vacant lot, approximately 500 square feet	Demo		
164	House (4BR/2B), approximately 1,896 square feet (original house 1901-1910; present house 1925-1935?)	Demo		
164	Animal care building, approximately 1000 square feet	Demo		
164	Sheds, approximately 450 square feet	Demo		
164	Extensive chicken coop complex	Demo (No Permit)		
165	House (3BR/2B), approximately 1,392 square feet (original house 1901-1910; present house 1925-1935?)	Demo		
165	Garage, approximately 400 square feet	Demo		
166	House (2BR/1B), approximately 1,345 square feet (original house 1901-1910; present house 1925-1935)	Demo		
166	Laundry house/shed, Approximately 100 square feet	Demo (No Permit)		

Exhibit H – Identification of Camp Structures and Phases of Work						
	(Rev. 11/1/2023)					
House/Lot	Description	Phase of Work				
Number	(Approximate date of construction)					
171	House (3BR/2B), approximately 1,441 square feet	Demo				
	(1935-1947)	_				
171	Garage, approximately 290 square feet	Demo				
171	Open shed/lanai, approximately 155 square feet	Demo (No Permit)				
171	Open shed, approximately 85 square feet	Demo (No Permit)				
171	Two pre-fab garden sheds, 120 square feet each	Demo (No Permit)				
171	Two wood/metal sheds, 100 square feet total	Demo (No Permit)				
173	House (3BR/2B), approximately 1,344 square feet	Move - YWH				
173	Garage/shed, approximately 280 square feet	Demo				
173	Small shed, approximately 35 square feet	Demo (No Permit)				

Current Count:

- 19 Houses to be moved by YWH (all permitting by YWH)
- 16 Houses to be demolished (permitting by A&B)
- 73 Outbuildings to be demolished (permitting by A&B, as required)

Above includes 35 Outbuildings or groups of outbuildings (e.g., chicken coops) no more than 200 square feet in size

Estimated number of demo permits required by A&B = 54

Note: Per Building Division, portions of structures to be re-located that will be left behind do not require a separate permit for demolition. For each house to be moved, confirm whether demolition of any associated outbuildings that are attached to the house may be covered by the relocation permit. (Potentially applies to three structures?)

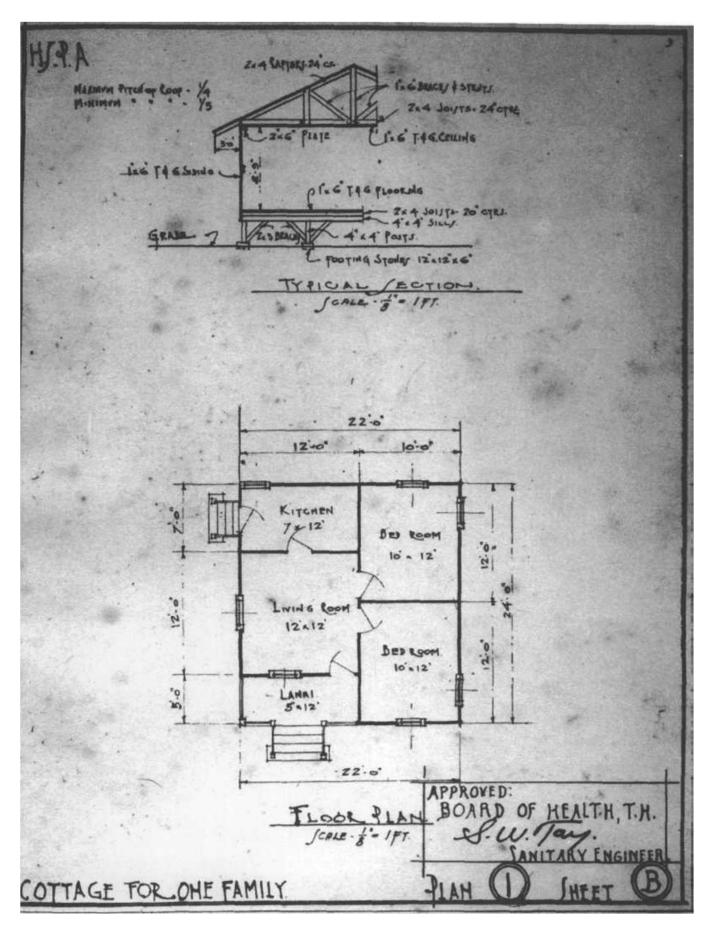


EXHIBIT I-1 – Hawaiian Sugar Planters' Association Plans for Single-Family Cottage (1920)

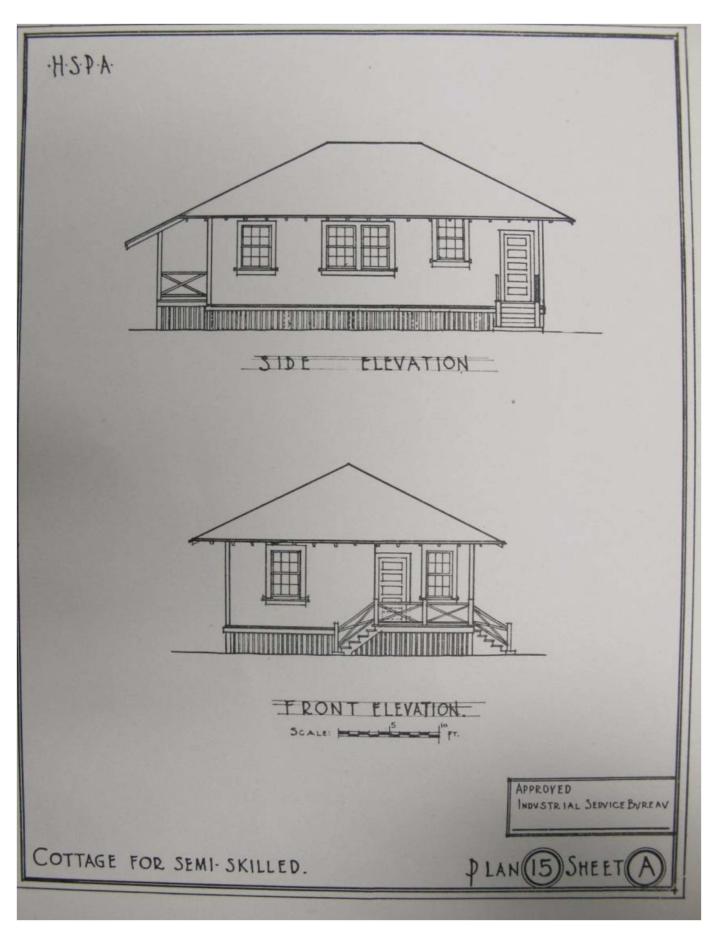


EXHIBIT I-2 – Hawaiian Sugar Planters' Association Plans for Semi-Skilled Worker Cottage (1935)
(Sheet 1 of 2)

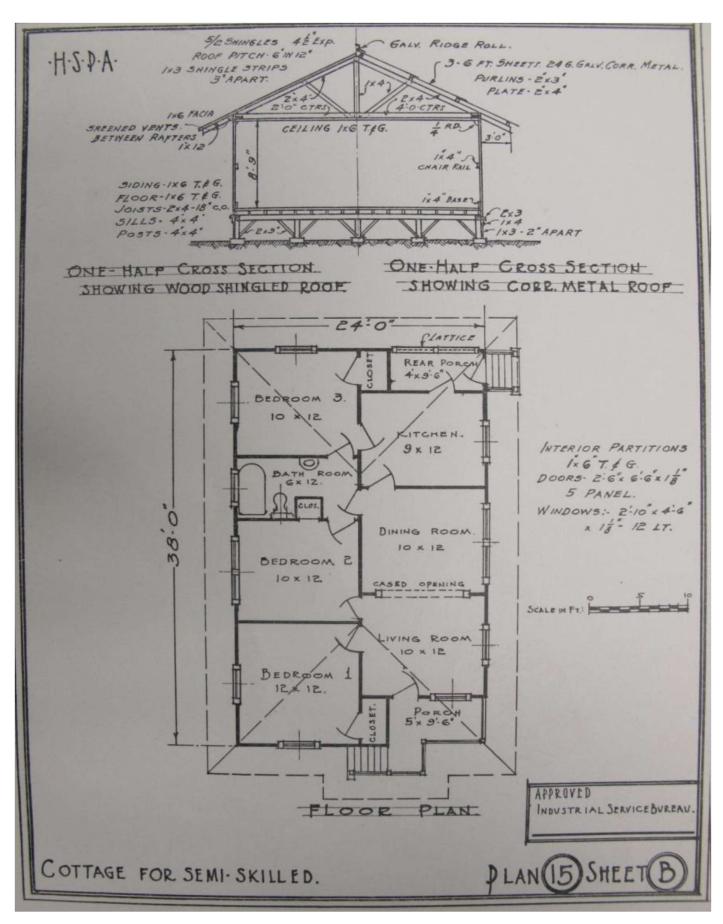


EXHIBIT I-2 – Hawaiian Sugar Planters' Association Plans for Semi-Skilled Worker Cottage (1935)
(Sheet 2 of 2)

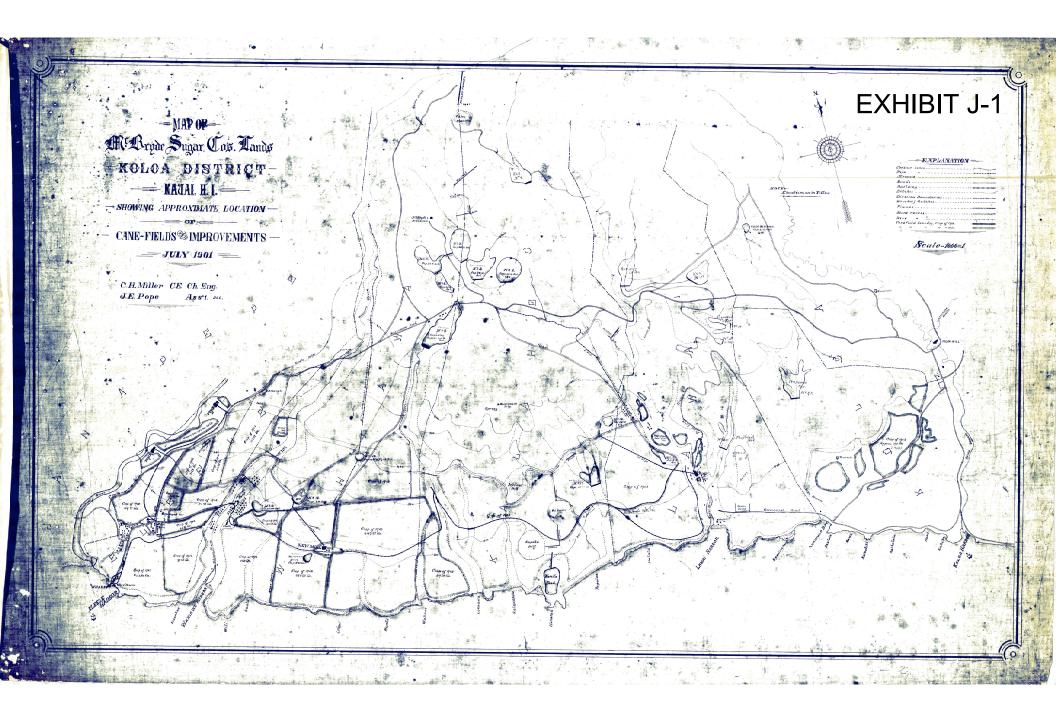
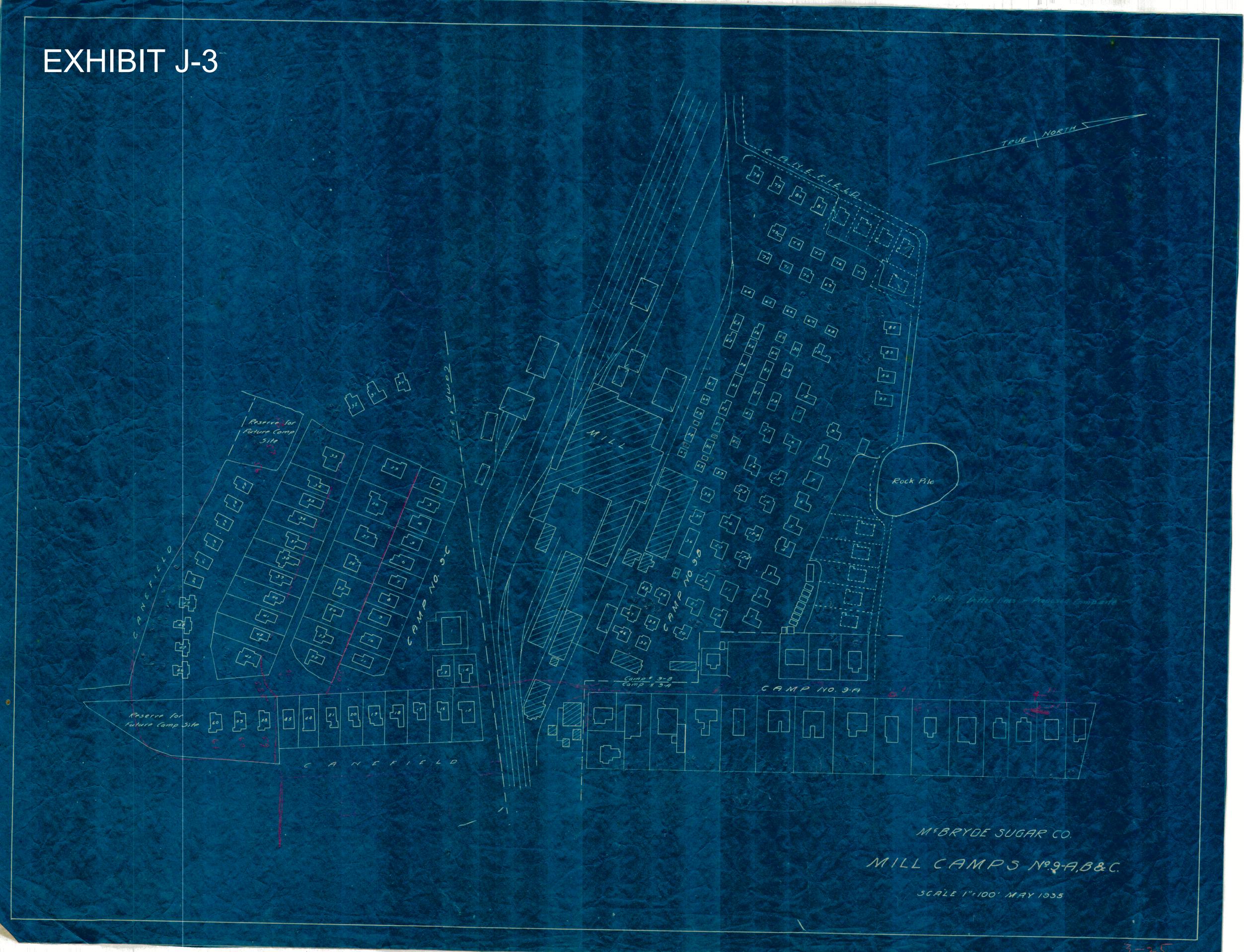




EXHIBIT J-2 – Excerpt from USGS Kauai Topographic Map, Hanapepe Quadrangle (1910)

Shown is "McBryde Plantation Mill" with Camp 9A houses along east side of McBrdye New Mill Road, Camp 9C dwellings below the mill railroad tracks, and the original, lower section of Camp 9B located just above the mill









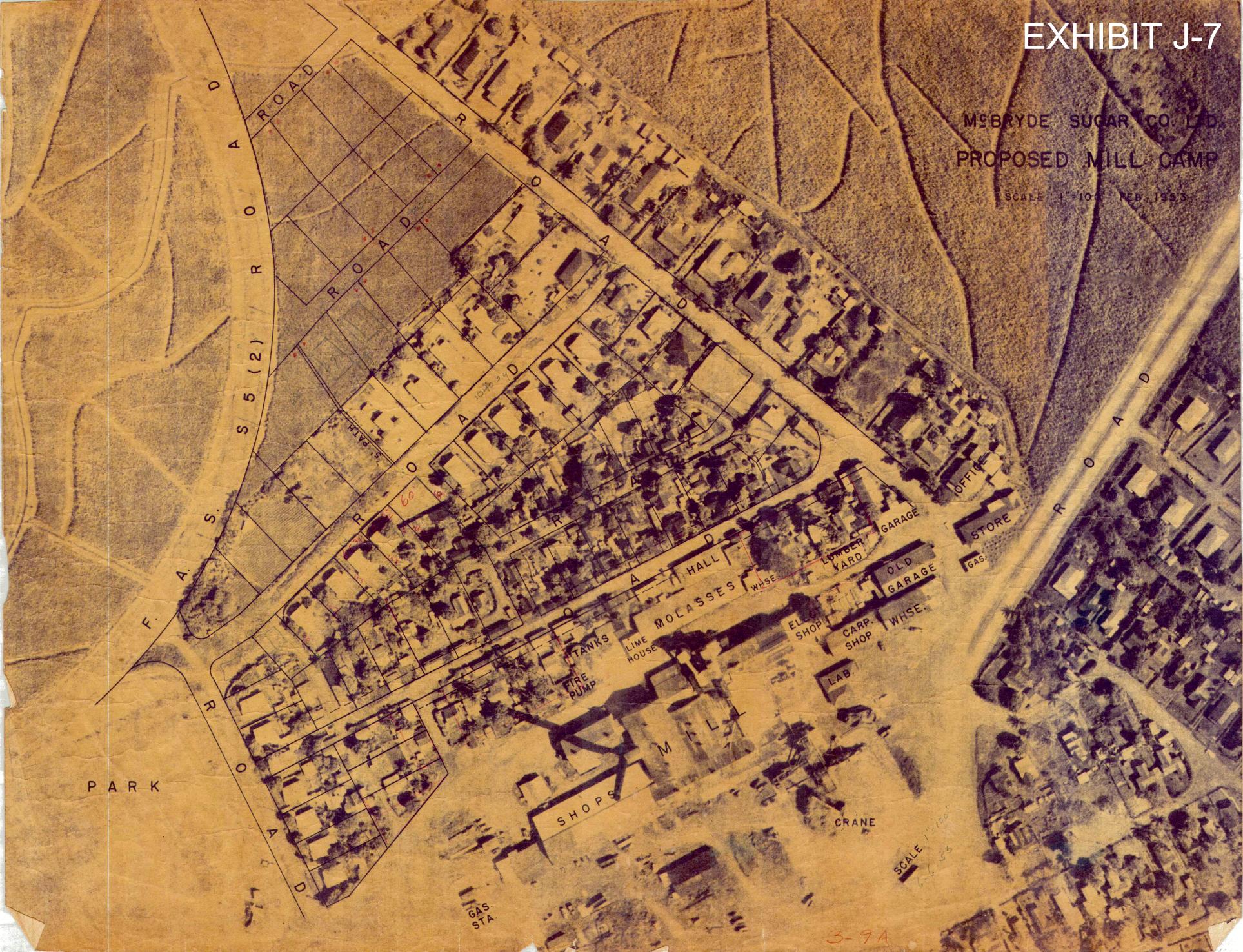






EXHIBIT K CAMP PHOTOGRAPHS

Undated photo of McBryde "New Mill" smokestack, likely viewed from within Camp 9B

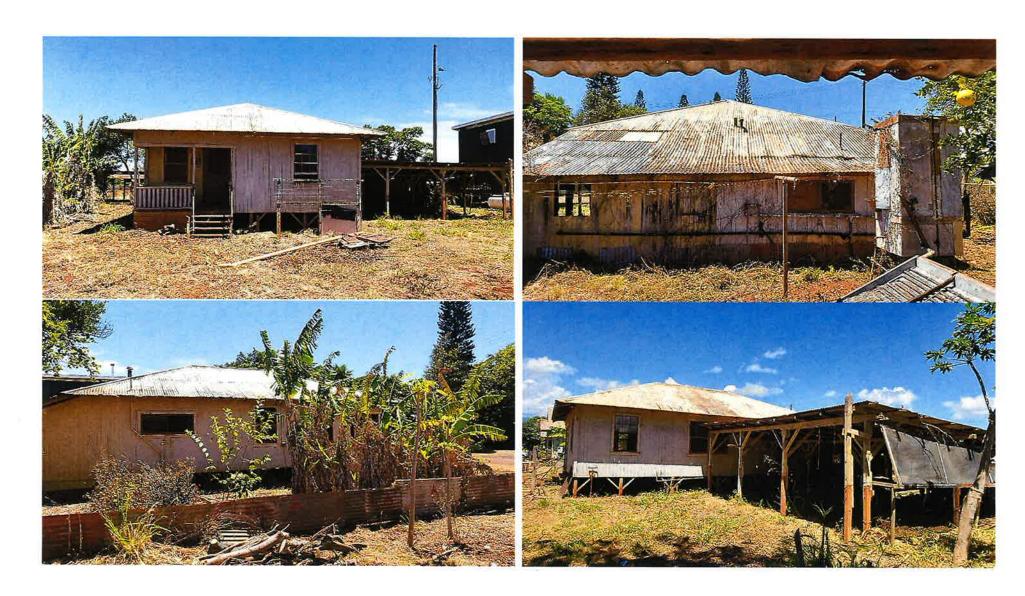
This Exhibit K presents recent photographs of each of the residential dwelling units to be removed from the camp (either by relocation for off-site renovation and re-use or by demolition), along with a limited number of representative photographs of accessory structures to be removed by demolition and some overview photographs of the camp.

Also included are photographs representative of damage and deterioration to many of the houses in the camp. Among the major types of damage and deterioration observed are structural failures (e.g., deteriorated or collapsing walls, ceilings, floors, building supports), roof failures (evidenced by obvious holes in the roof or, more commonly, by significant water damage to canec or wooden ceilings and/or the presence of mold), rotten or termite infested building components (evidenced by holes in floors or walls, insect boreholes, and/or large amounts of frass), vandalism/theft (e.g., building components such as windows and doors removed or physically cut out of the structures. Roof leaks or complete roof failures in particular are common throughout the camp and contribute to deterioration of building interior components by water damage. Termite infestations are ubiquitous, throughout the camp, often with severe damage to both finishing and structural members. Photographs provided are not intended to document all damage existing in every camp house, but merely to be representative of the types of damage or deterioration that may be found to varying degrees in houses throughout the camp, particularly in those houses currently planned for demolition. It is important to note that no formal assessments were

conducted of any of the buildings in the camp; damage and deterioration identified herein is limited to what was readily identifiable during a simple walkthrough of the structures.

The index below is provided as a finding aid for the photographs in this Exhibit.

		PHO	TO INDEX - CAMP HOUSES		
Photo #	Subject	Photo #	Subject	Photo #	Subject
1-4	House #149	5-8	House #150	9-12	House #151
13-16	House #152	17-20	House #164	21-24	House #165
25-28	House #166	29-32	House #123	33-36	House #122
37-40	House #121	41-44	House #120	45-48	House #119
49-52	House #117	53-56	House #116	57-60	House #115
61-64	House #113	65-68	House #111	69-72	House #104
73-76	House #105	77-80	House #106	81-84	House #107
85-88	House #108	89-92	House #109	93-96	House #173
97-100	House #171	101-104	House #95	105-108	House #96
109-112	House #97	113-116	House #100	117-120	House #102
121-124	House #103	125-128	House #82	129-132	House #83
133-136	House #90	137-140	House #91		
	PHOTO INDE	X – REPRI	ESENTATIVE SELECTION OF O	UTBUILDI	NGS
Photo #	Subject	Photo #	Subject	Photo #	Subject
141-144	Garages at Houses #91 (lot), #105,	145-148	Laundry sheds and other		•
	#151/152, and #117		outbuildings at Houses #82, #90,		
			#121, and #100		
	PHOTO INI	DEX – REP	RESENTATIVE DAMAGE/DETE	RIORATIO	N
Photo #	Subject	Photo #	Subject	Photo #	Subject
149-154	Deterioration observed in House #82	155-159	Deterioration observed in House #90	160-163	Deterioration observed in House #91
164-166	Deterioration observed in House #96	167-171	Deterioration observed in House #97	172-173	Deterioration observed in House #108
174-177	Deterioration observed in House #113	178	Deterioration observed in House #119	179-180	Deterioration observed in House #120
181-185	Deterioration observed in House #165	186-188	Deterioration observed in House #166		11 2 200
		PHO	OTO INDEX – OVERVIEW		I
Photo #	Subject	Photo #	Subject	Photo #	Subject
189-192	Camp Roadways			I HOTO II	Subject



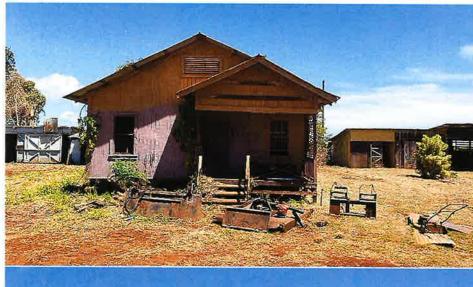
NUMILA CAMP
(CAMP 9A)
HOUSE #149
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 1-4) Camp Houses

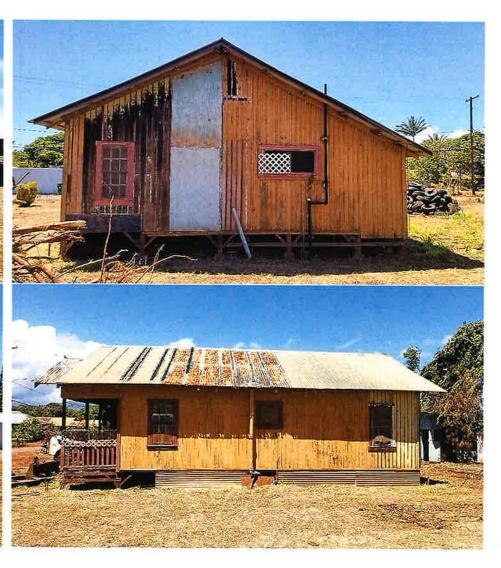


NUMILA CAMP
(CAMP 9A)
HOUSE #150
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 5-8) Camp Houses



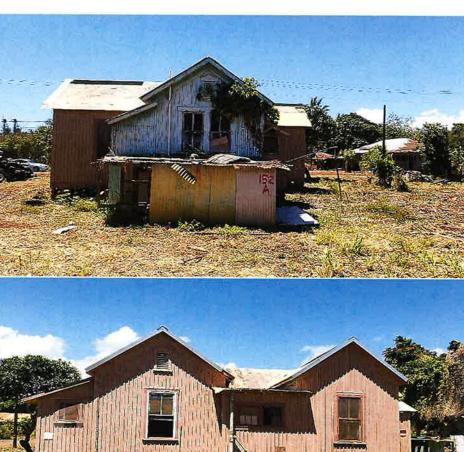




NUMILA CAMP
(CAMP 9A)
HOUSE #151
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

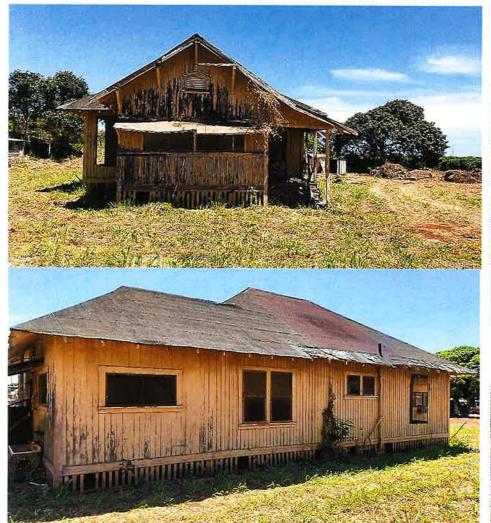
EXHIBIT K (Photos 9-12) Camp Houses





NUMILA CAMP
(CAMP 9A)
HOUSE #152
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 13-16) Camp Houses

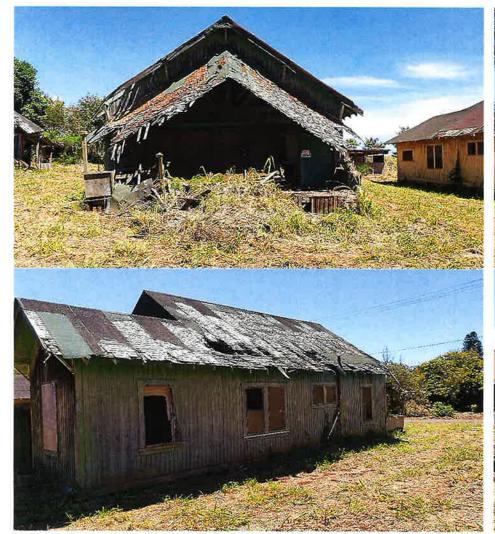






NUMILA CAMP
(CAMP 9A)
HOUSE #164
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 17-20) Camp Houses







NUMILA CAMP
(CAMP 9A)
HOUSE #165
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 21-24) Camp Houses





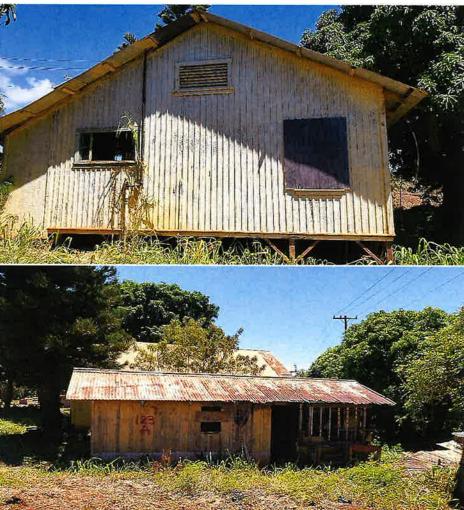


NUMILA CAMP (CAMP 9A) HOUSE #166 Planned for Demolition

View (clockwise from upper left): front, back, left side, right side)

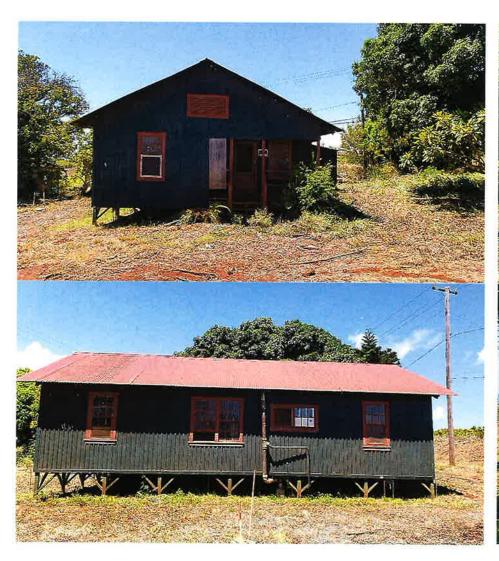
EXHIBIT K (Photos 25-28) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #123
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

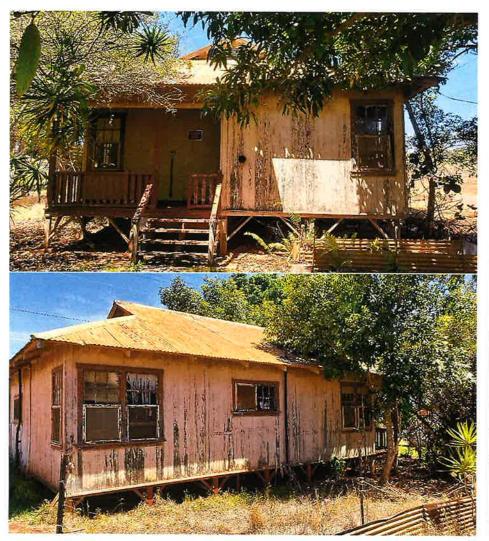
EXHIBIT K (Photos 29-32) Camp Houses

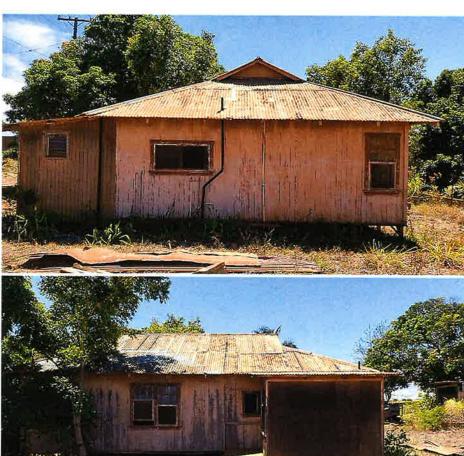




NUMILA CAMP
(CAMP 9B)
HOUSE #122
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 33-36) Camp Houses



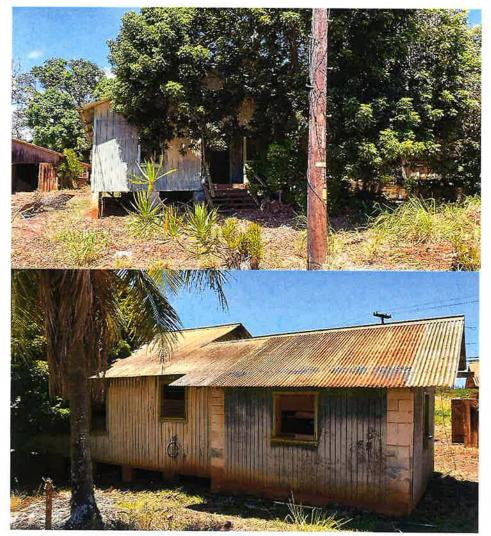


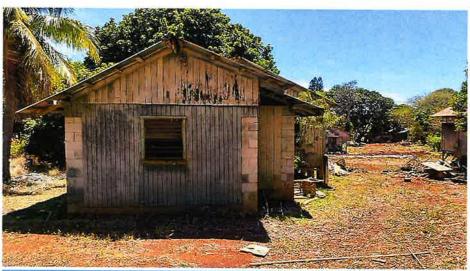
NUMILA CAMP (CAMP 9B) **HOUSE #121**

Planned for Relocation

View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 37-40) **Camp Houses**





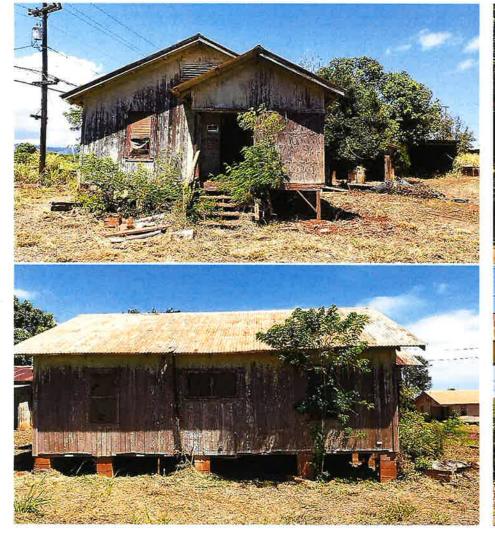


NUMILA CAMP (CAMP 9B) HOUSE #120

Planned for Demolition

View (clockwise from upper left): front, back, left side, right side)

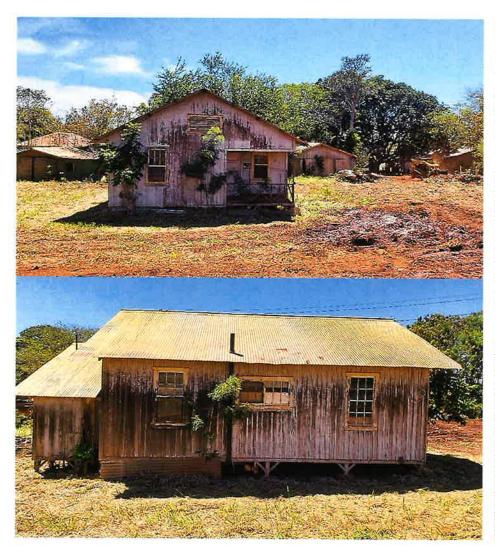
EXHIBIT K (Photos 41-44) Camp Houses

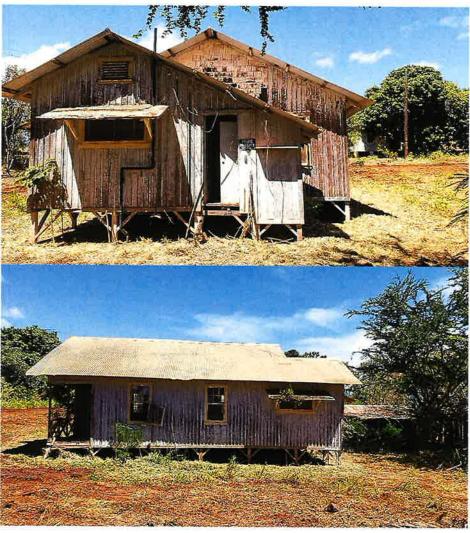




NUMILA CAMP
(CAMP 9B)
HOUSE #119
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

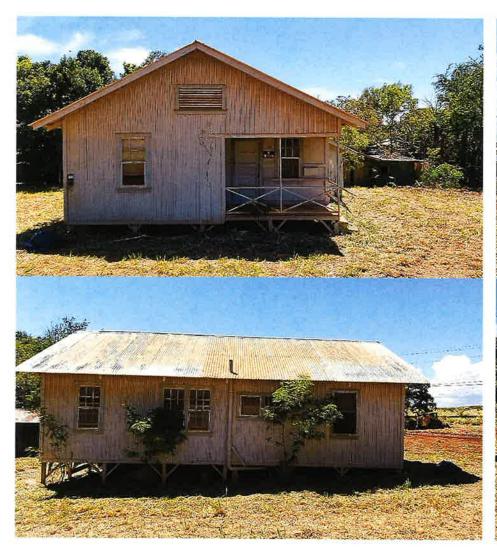
EXHIBIT K (Photos 45-48) Camp Houses

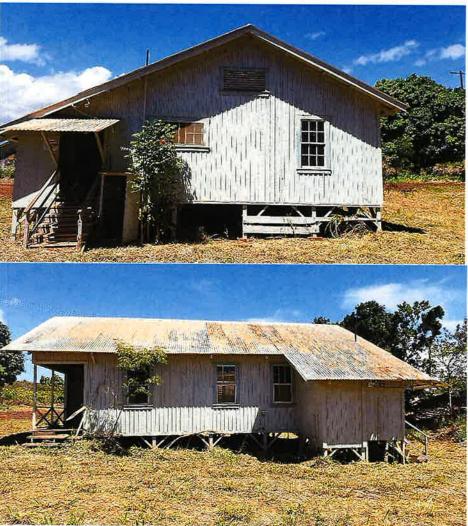




NUMILA CAMP
(CAMP 9B)
HOUSE #117
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 49-52) Camp Houses

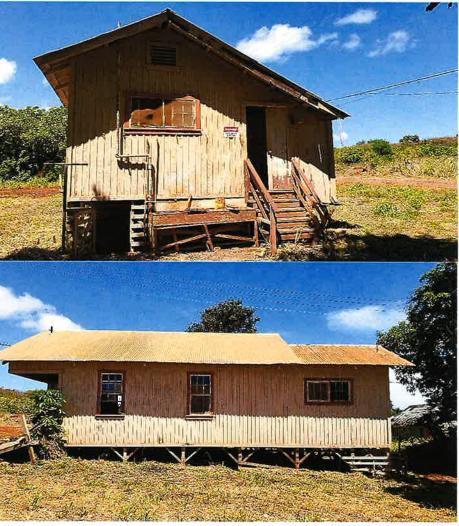




NUMILA CAMP
(CAMP 9B)
HOUSE #116
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

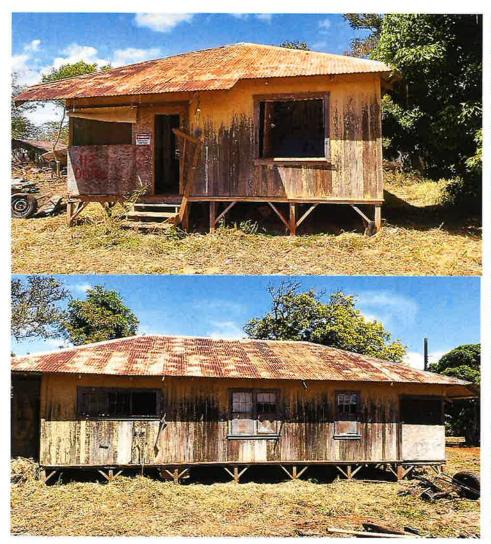
EXHIBIT K (Photos 53-56) Camp Houses

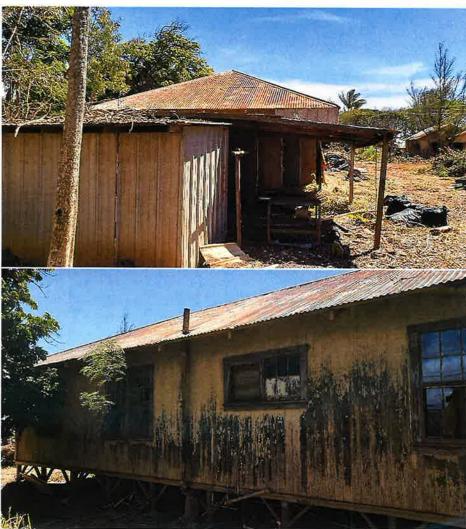




NUMILA CAMP
(CAMP 9B)
HOUSE #115
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 57-60) Camp Houses

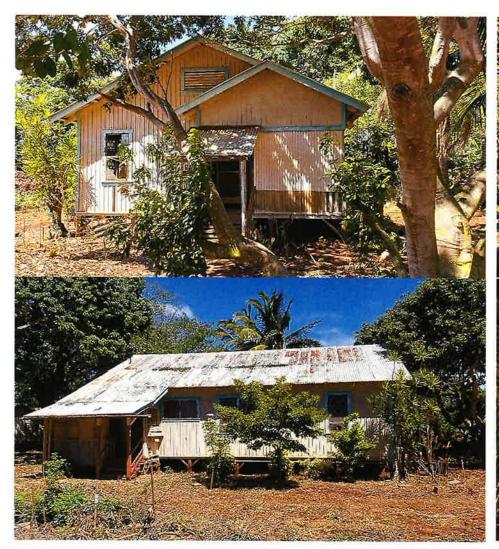




NUMILA CAMP (CAMP 9B) HOUSE #113 Planned for Demolition

View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 61-64) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #111
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 65-68) Camp Houses







NUMILA CAMP (CAMP 9B) HOUSE #104

Planned for Demolition

View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 69-72) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #105
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

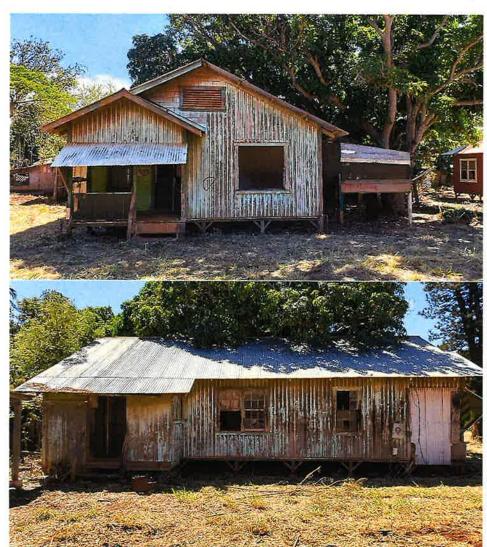
EXHIBIT K (Photos 73-76) Camp Houses

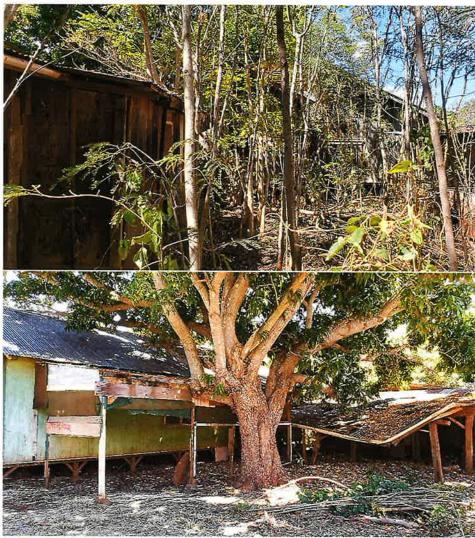




NUMILA CAMP
(CAMP 9B)
HOUSE #106
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

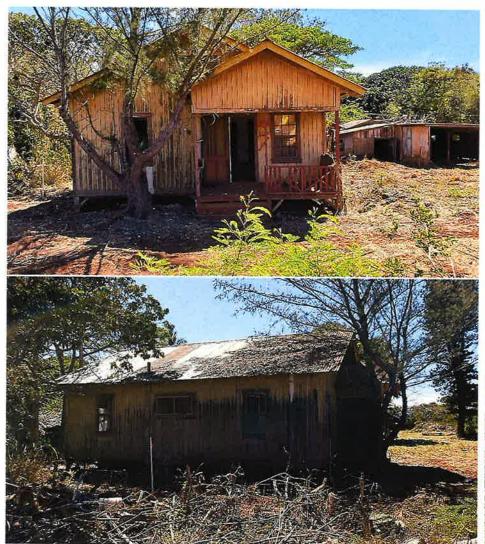
EXHIBIT K (Photos 77-80) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #107
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

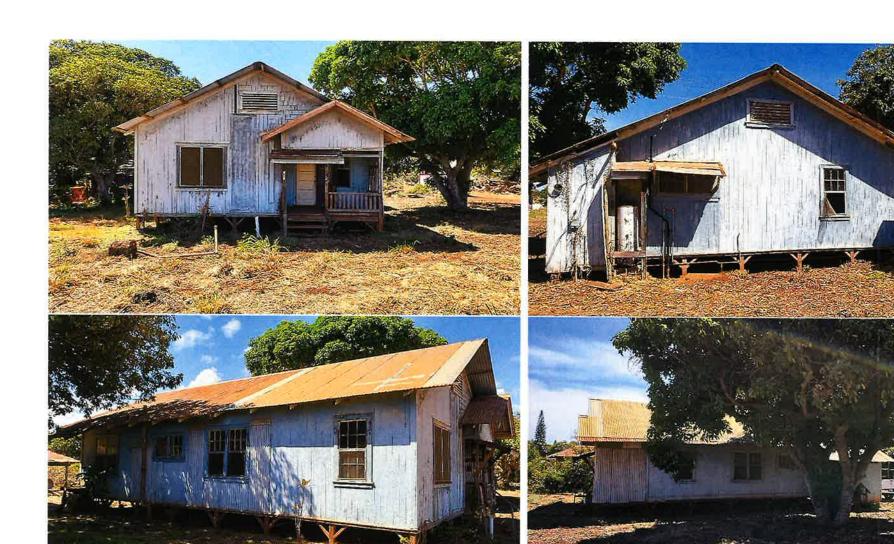
EXHIBIT K (Photos 81-84) Camp Houses





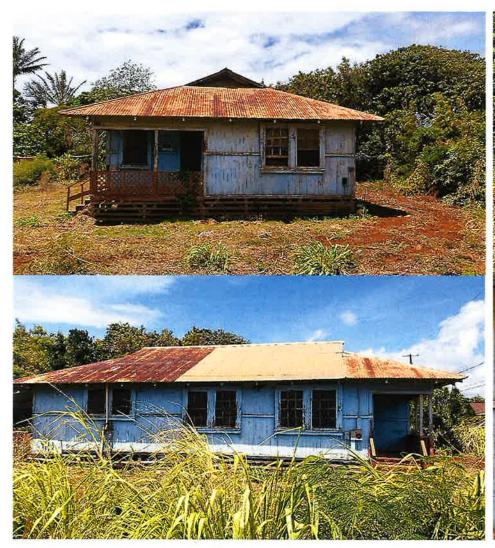
NUMILA CAMP
(CAMP 9B)
HOUSE #108
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 85-88) Camp Houses



NUMILA CAMP
(CAMP 9A)
HOUSE #109
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 89-92) Camp Houses

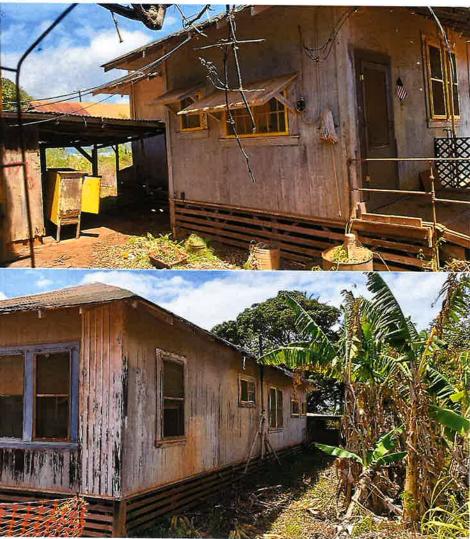




NUMILA CAMP
(CAMP 9A)
HOUSE #173
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 93-96) Camp Houses





NUMILA CAMP
(CAMP 9A)
HOUSE #171
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 97-100) Camp Houses



NUMILA CAMP
(CAMP 9B)
HOUSE #95
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 101-104) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #96
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

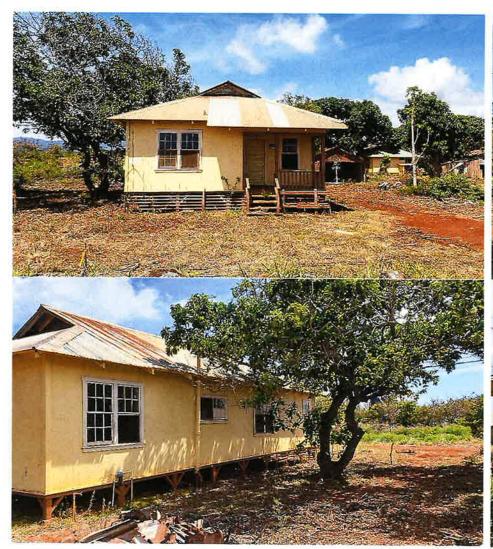
EXHIBIT K (Photos 105-108) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #97
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 109-112) Camp Houses





NUMILA CAMP
(CAMP 9B)
HOUSE #100
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 113-116) Camp Houses



NUMILA CAMP
(CAMP 9B)
HOUSE #102
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 117-120) Camp Houses



NUMILA CAMP
(CAMP 9B)
HOUSE #103
Planned for Relocation
View (clockwise from upper left): front, back, left side, right side)

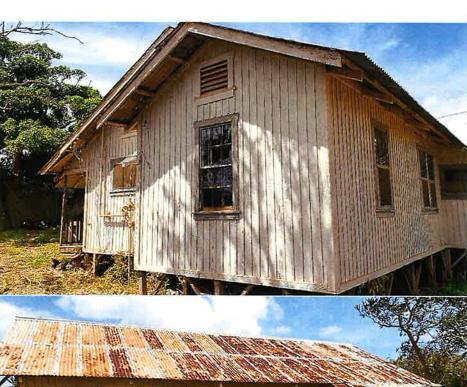
EXHIBIT K (Photos 121-124) Camp Houses



NUMILA CAMP
(CAMP 9B)
HOUSE #82
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 125-128) Camp Houses





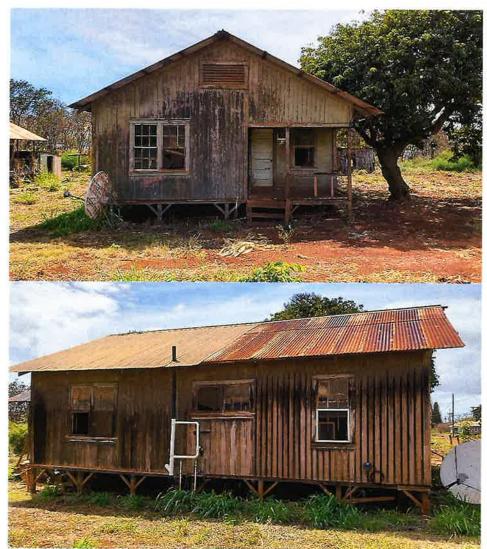


NUMILA CAMP (CAMP 9B) HOUSE #83

Planned for Relocation

View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 129-132) Camp Houses

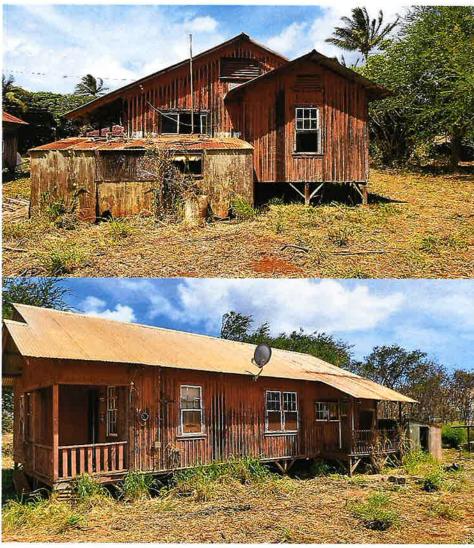




NUMILA CAMP
(CAMP 9B)
HOUSE #90
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

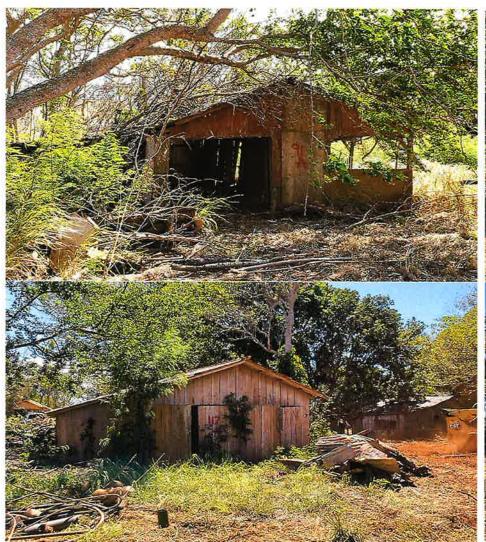
EXHIBIT K (Photos 133-136) Camp Houses

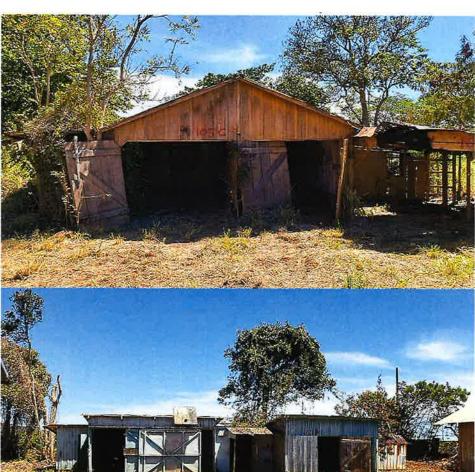




NUMILA CAMP
(CAMP 9B)
HOUSE #91
Planned for Demolition
View (clockwise from upper left): front, back, left side, right side)

EXHIBIT K (Photos 137-140) Camp Houses





NUMILA CAMP

Clockwise from upper left:
Garage at former house #91
Garage and covered lanai at house #105
Garages and other outbuildings at house #151 and #152
Garage and attached laundry shed at house #117
All Planned for Demolition

EXHIBIT K
(Photos 141-144)
Representative Selection of Outbuildings



NUMILA CAMP

Clockwise from upper left:
Laundry shed and other outbuildings at house #82
Laundry shed at house #91
Plywood shed at house #121
Laundry shed and garage at house #100
All Planned for Demolition

EXHIBIT K
(Photos 145-148)
Representative Selection of Outbuildings

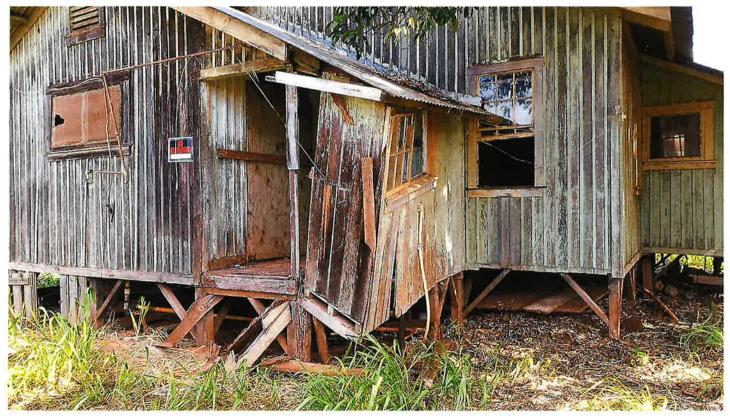


Photo 149 (above): Collapsing porch at back of house #82

Photo 150 (below): Walls separating at corner, interior of house #82



EXHIBIT KRepresentative Damage and Deterioration



Photo 151 (above): Wall eaten through by termite infestation, house #82

Photo 152 (below): Floor rotted through, bathroom of house #82



EXHIBIT KRepresentative Damage and Deterioration



Photo 153 (above): Front porch rotted and termite eaten, house #82



EXHIBIT KRepresentative Damage and Deterioration



Photo 155 (above): Interior canec water damaged and moldy (indicative of roof leaks), house #90



EXHIBIT KRepresentative Damage and Deterioration



Photo 157 (above): Termite damage on building exterior (evidence of infestation), house #90

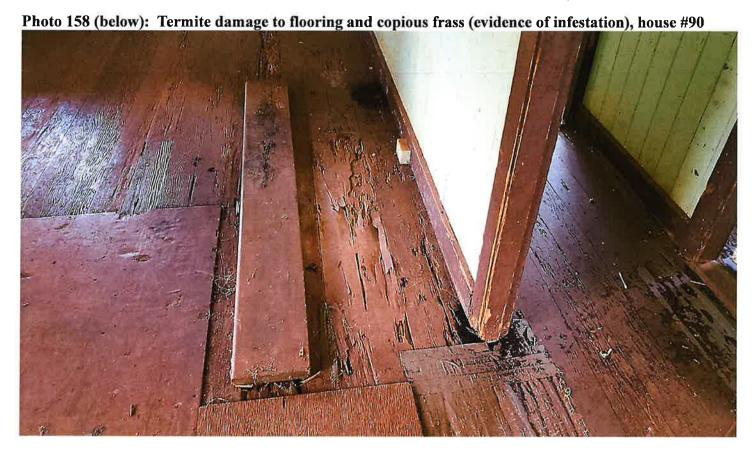


EXHIBIT K Representative Damage and Deterioration



Photo 159 (above): More termite damage to floor, including hole through floor, house #90

Photo 160 (below): Massive termite damage to main joist at support post, house #91



EXHIBIT K Representative Damage and Deterioration



Photo 161 (above): Floor joist eaten through by termites, house #91





EXHIBIT K Representative Damage and Deterioration



Photo 163 (above): Walls coming apart in bathroom, house #91





EXHIBIT KRepresentative Damage and Deterioration



Photo 165 (above): Falling canec with mold due to leaking roof, house #96



EXHIBIT KRepresentative Damage and Deterioration



Photo 167 (above): Heavily damaged and moldy canec due to leaking roof, house #97

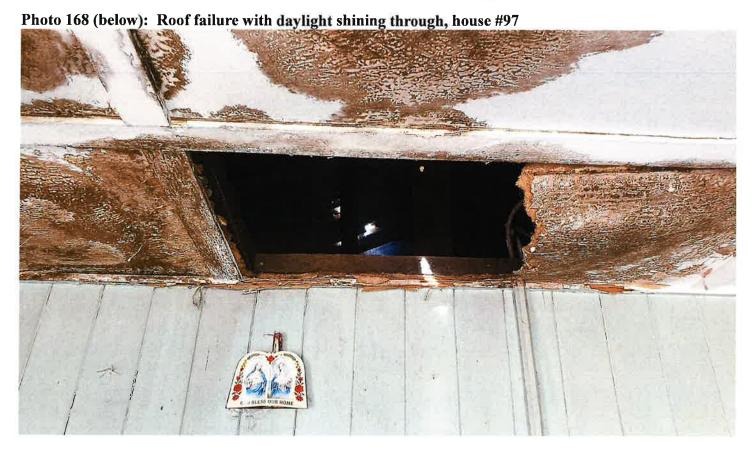


EXHIBIT KRepresentative Damage and Deterioration



Photo 169 (above): Hole through floor from termite damage and rot, house #97

Photo 170 (below): Severe termite damage to floor joist, house #97

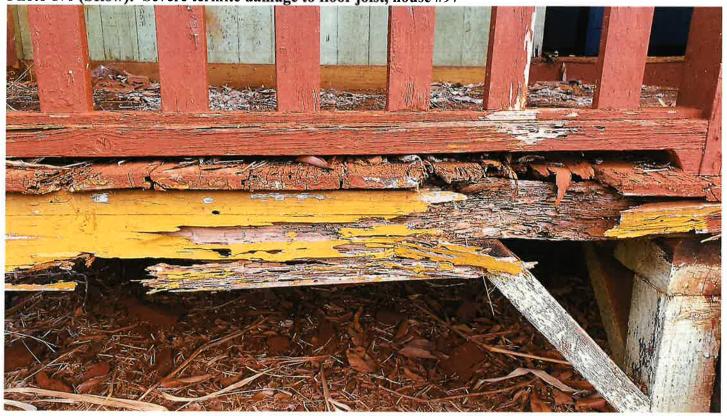


EXHIBIT KRepresentative Damage and Deterioration



Photo 171 (above): Severe termite damage to floor and walls, house #97

Photo 172 (below): Complete failure of roof, house #108



EXHIBIT KRepresentative Damage and Deterioration



Photo 173 (above): Water damaged and moldy canec from roof failure, house #108

Photo 174 (below): Wall rotted through at front door, house #113

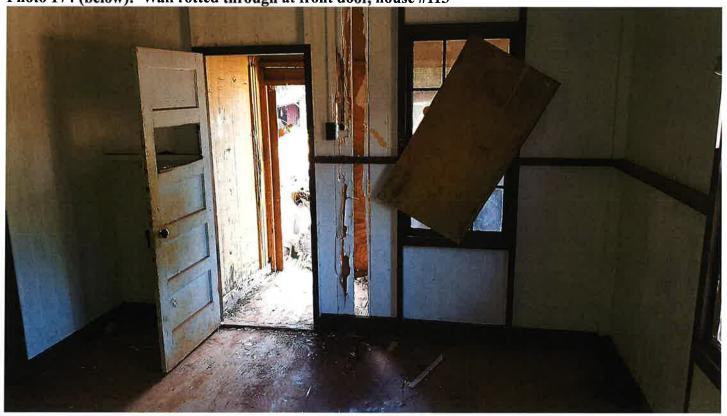


EXHIBIT K Representative Damage and Deterioration



Photo 175 (above): Water damaged canec from roof failure, house #113

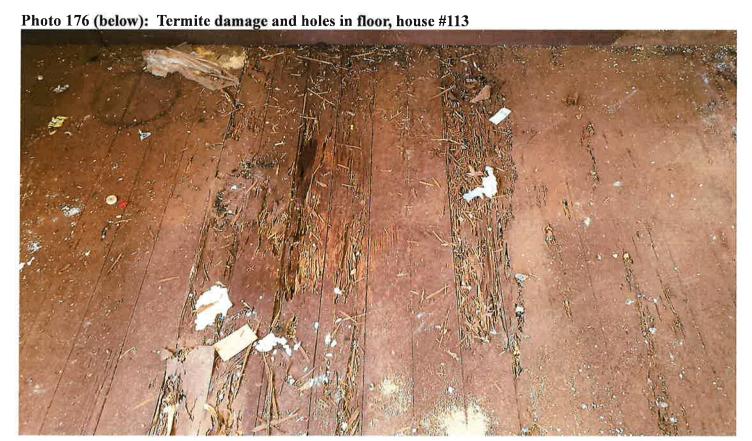


EXHIBIT KRepresentative Damage and Deterioration

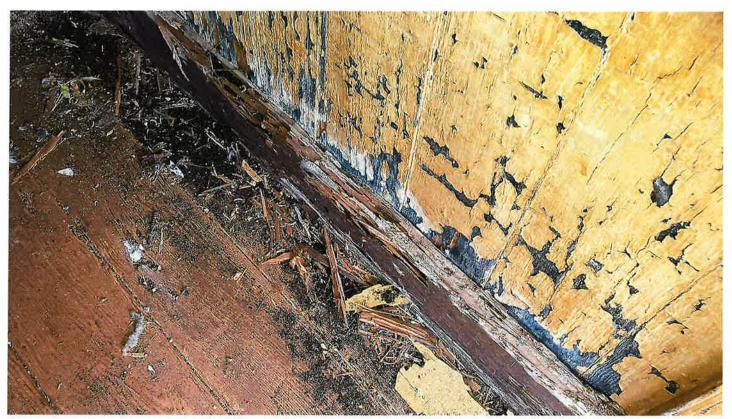


Photo 177 (above): Termite damage and frass (evidence of infestation), house #113

Photo 178 (below): General dilapidation (falling canec, holes in floor, stolen door/jamb), house #119



EXHIBIT KRepresentative Damage and Deterioration



Photo 179 (above): Broken corner post, house #120

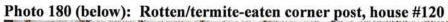




EXHIBIT KRepresentative Damage and Deterioration



Photo 181 (above): Collapsed porch, house #165

EXHIBIT KRepresentative Damage and Deterioration



Photo 182 (above): Roof failure with gaping holes, house #165

EXHIBIT KRepresentative Damage and Deterioration

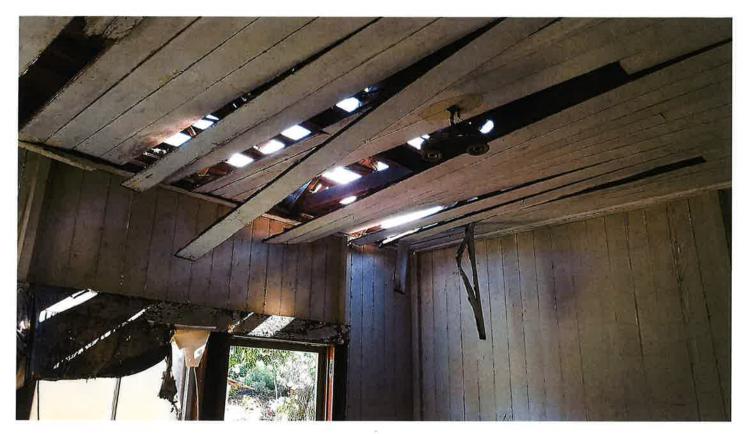


Photo 183 (above): Collapsing wooden ceiling, house #165

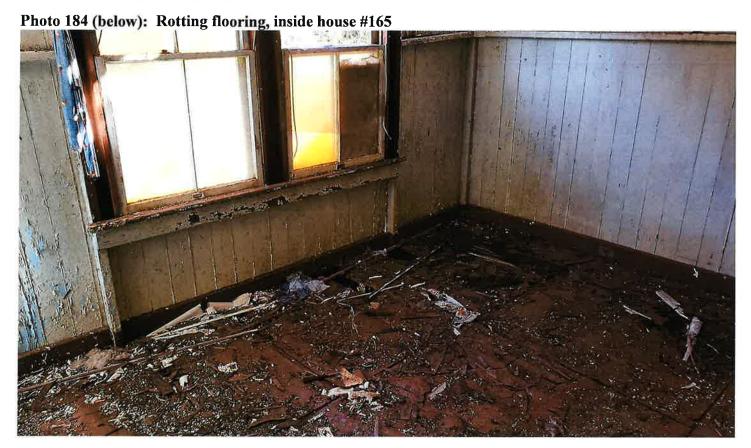


EXHIBIT KRepresentative Damage and Deterioration



Photo 185 (above): Front wall failing, house #165

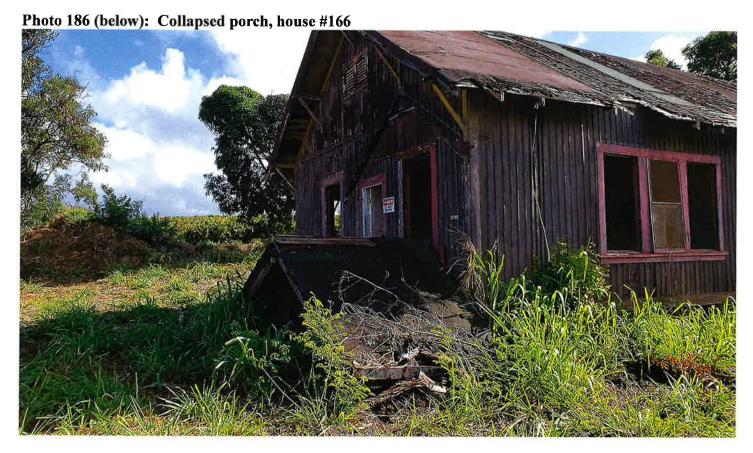


EXHIBIT KRepresentative Damage and Deterioration

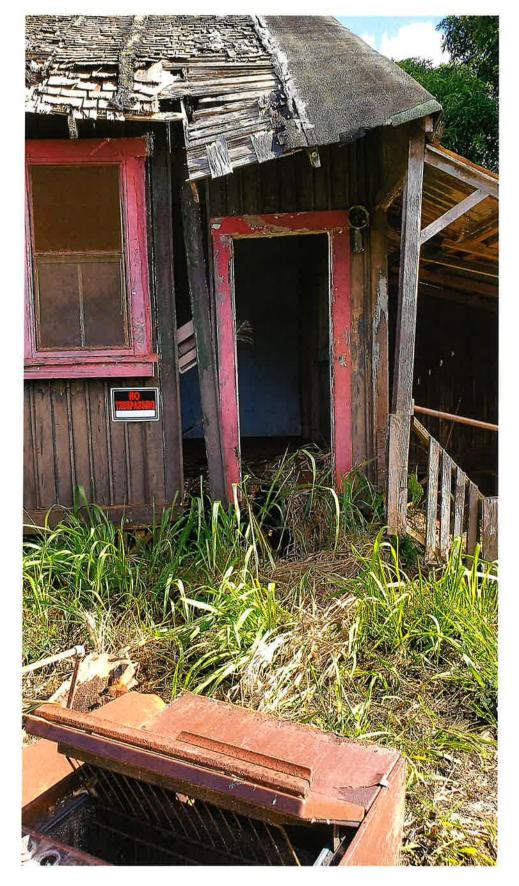


Photo 187 (above): Building buckling at back corner of kitchen, house #166

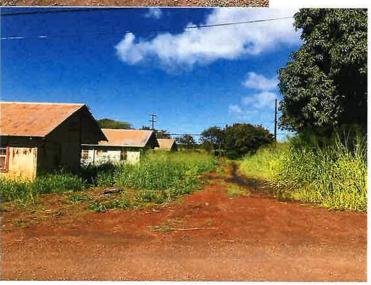
EXHIBIT KRepresentative Damage and Deterioration



Photo 188 (above): Collapsing wooden ceiling with failed roof above, house #166

EXHIBIT KRepresentative Damage and Deterioration





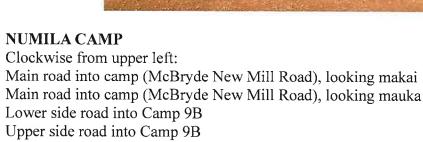






EXHIBIT K (Photos 189-192) Overview Photos



PARTNERS FOR HAWAI'I

Numila Camp Removal Project

Presentation to Kauai Historic Preservation Review Commission – November 16, 2023

Presented by: Sean M. O'Keefe Director, Environmental Affairs Alexander & Baldwin, Inc.



Camp History

Numila Camp was owned and operated by McBryde Sugar Company since its initial construction circa 1901 at McBryde's "New Mill".

Originally consisted of Camps 9A ("Haole Camp"), 9B ("Japanese Camp"), and 9C ("Portuguese Camp").

At its peak in the 1940's and 1950's, the camp is estimated to have included nearly 200 dwellings of various types housing more than 700 persons.

By about 1960, Camp 9C had been removed. New construction in the camp ended in the 1950's, and gradual phase-out of the lower portion of Camp 9B (just above the mill) followed.



Camp History (continued)

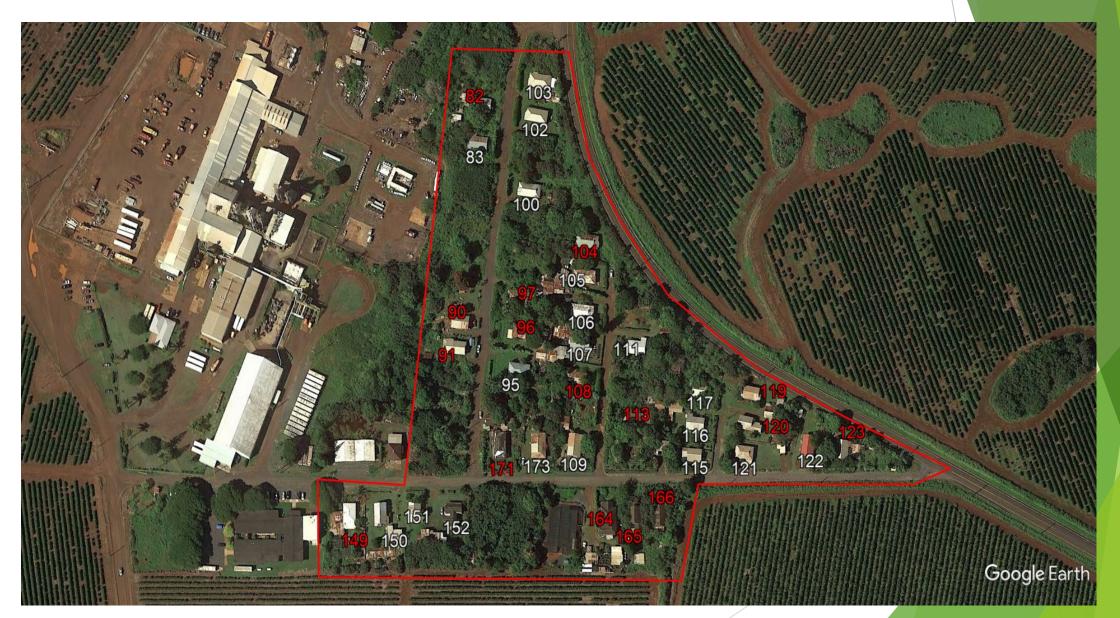
The camp now includes 35 dwellings in various states of disrepair and an additional 73 outbuildings (garages, laundry houses, etc.).

After cessation of sugar operations in 1996, McBryde allowed pensioners to remain in the camp pending its eventual demolition. By the end of 2022, all pensioners had vacated the camp.

McBryde lands, including at Numila, were sold to BBCP Kauai Operating, LLC in 2022.

McBryde retained ownership of all remaining structures within a 16-acre camp easement area and is contractually obligated to remove them.

Numila Camp – Current Condition





Project Summary

All "Dwelling Improvements" to be removed from the camp, pursuant to the sale agreement. BBCP plans for the property are under development.

In an effort to preserve structures to the extent feasible, McBryde provisionally conveyed ownership of 19 houses to Your Way Home, LLC.

YWH plans to relocate houses off-site to properties it controls in Koloa, Wailua, and Kapaa for renovation and re-use.

All structures which YWH cannot cost-effectively re-locate, renovate, and sell for re-use are to be demolished. No structures will remain within the 16-acre easement area.



Project Status

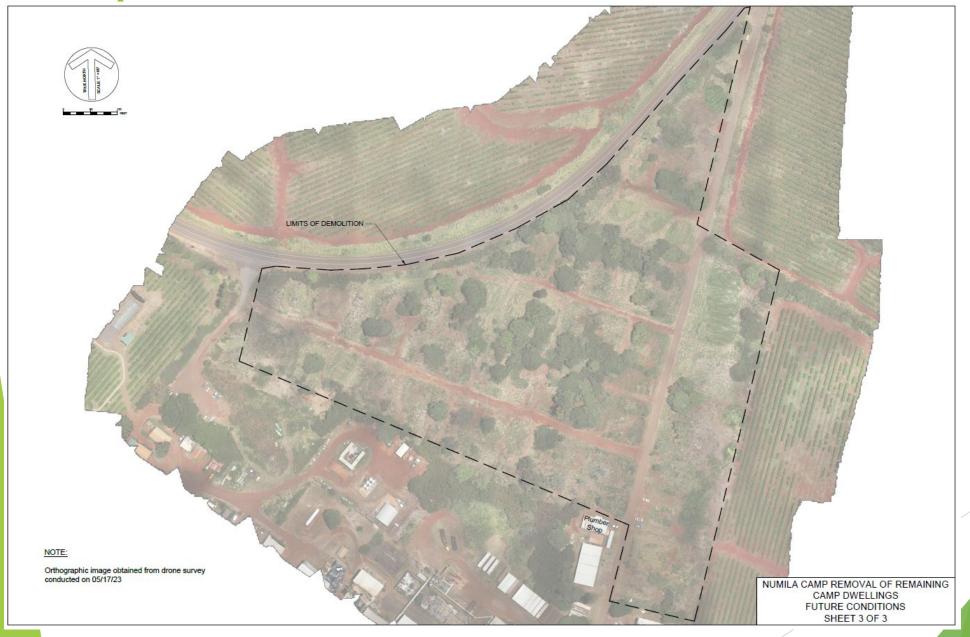
Removal of accumulated solid waste and hazardous materials, cutting of heavy overgrowth of vegetation throughout the camp in progress.

Building surveys for hazardous materials (asbestos, lead-based paint, canec) completed and abatement plans under development.

Environmental investigations and site remediation planned or in progress.

Applications for required demolition/relocation and other site work being prepared for submittal.

Camp Future Condition – Vacant Land



ALL SAINT'S PERMANENT COVERED LANAI

FOR COVID RESTRICTED WORSHIPPING AND COMMUNITY EVENTS

To the Kauai Preservation Commission,

This request is for the installation of a permanent covered Lanai, to replace our temporary tarp roof. The Lanai tarp roof was initially erected due to Covid restrictions to allow patrons the option for outside seating during services. Unfortunately, the Covid issues have not gone away and many of our worshippers still prefer outside seating. The temporary tarp roof has required constant maintenance and the once grassy area underneath has become dirt which gets tracked into the Sanctuary. We have also found the lanai area needed for overflow seating for larger events, such as interfaith services, funerals, marriages and musical concerts. Assuming that our present Covid situation is the "new normal", the vestry has decided to make our temporary lanai permanent.

Since we renovated the pipe organ in 2021, we have diligently worked to bring world class organists to perform for our island community. These public organ concerts have become more and more popular, requiring use of the lanai for overflow seating. The Sanctuary has been recognized as a wonderful place to hold other musical events such as the Kauai Island Singers concerts, McMaster Slack Key guitar concert series, Monica Chung and Patricia Olivarez piano recitals, and the recent Daniel Welch and friends concert. The addition of a permanent covered lanai will enhance our ability to offer these events to our island community.

Additionally, the lanai has come to serve many other purposes as well. As part of our outreach to the Houseless community, the church works with Project Vision to provides showers, medical attention, and meals every week. The picnic tables under the lanai are used by our guests to eat lunch while waiting for their showers. We also donate used clothing, which is displayed and distributed under the lanai.

Earlier this year, a large 20 ft x 40 ft concrete slab was laid on the south side of the Sanctuary. This permit request if for the permanent roof structure to cover the slab area. The architectural design of the roof structure was carefully selected to blend in with the Sanctuary's historic design.

Mahalo for your consideration of this proposal,

Ron Morinishi

All Saint's Church Jr. Warden

Ronald y Movement

H.4.

Nov 16, 2023

















Author's rendition of the Lanai roof as designed for this permit.

EPISCOPAL CHURCH IN HAWAII LANAI ADDITION



OWNERS & PROJECT INFORMATION

OWNERS: EPISCOPAL CHUCH IN HAWAII

CONTACT PHONE: (808)482-4509 (Ron Morinishi)

OWNERS ADDRESS: P.O. Box 248 Kapaa HI 96746

PROPERTY ADDRESS: 4-1061 Kuhio Hwy.

TMK: 4-5-004:018

CODE DATA

CODE EDITIONS:

2018 INTERNATIONAL RESIDENTIAL CODE 2018 INTERNATIONAL BUILDING CODE 2017 NATIONAL ELECTRICAL CODE 2018 UNIFORM PLUMBING CODE 2012 NFPA 1 With AMENDMENTS 2018 IECC (ENERGY CODE) COUNTY OF KAUAI TITLE V CHAPTER 12

WIND DESIGN CRITERIA: VEFF 130 mph

EXPOSURE C, KTZ 1.1

FLOOD HAZARD: ZONE X

DRAWING INDEX

PAGE	DESCRIPTION
0CS1	Cover Page
SP01	Plot Plan / Vicinity Map / Island Map
D01	Existing Roof Layout / Demolition Plan
A01	Floor Plan
A02	Exterior Elevations
A03	Building Cross Section
S01	Foundation Plan
S02	Roof Framing Plan
S03	Detail Drawings
E01	Electrical Plan

HAWAI'I WIND PROVISIONS FOR NEW CONSTRUCTION (APPENDIX W OF CHAPTER 12, BUILDING CODE)

This is required for areas of Kauai'i where the basic design wind speed is 130 mph or greater.

A. In wind-borne debris regions, glazing in buildings shall be impact resistant or protected with an impact resistant covering meeting the requirements of an approved impact-resistant standard of ASTM E1996 and ASTM E1886.

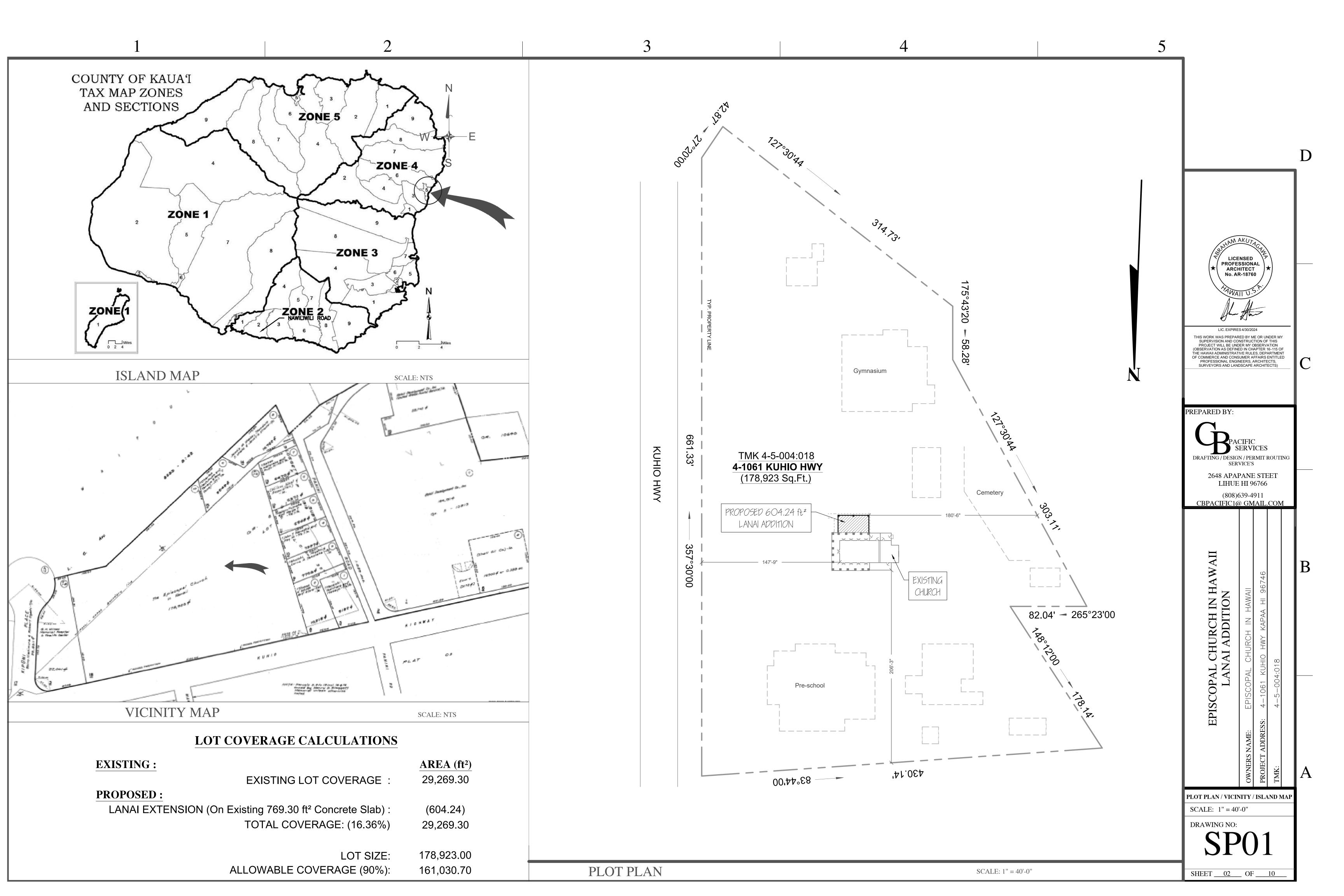
B. Wood structural panels with a minimum thickness of 7/16 inch and maximum panel span of 8 feet shall be permitted for opening protection in buildings with a mean roof height of 33 feet or less for Group R-3 or R-4 occupancies. Panels shall be precut so that they shall be attached to the framing surrounding opening containing the produce with the glazed opening. Panels shall be predrilled as required for anchorage method and shall be secured with the attachment hardware provided. Attachments shall be designed to resist the components and cladding loads determined in accordance with the provisions of ASCE 7, with corrosion-resistant hardware provided and anchors permanently installed on the building. Attachments in accordance with Table 1609.2 with corrosion-resistant attachment hardware is permitted for buildings with a mean roof height of 45 feet or less and effective wind speed not in excess of 140 mph.

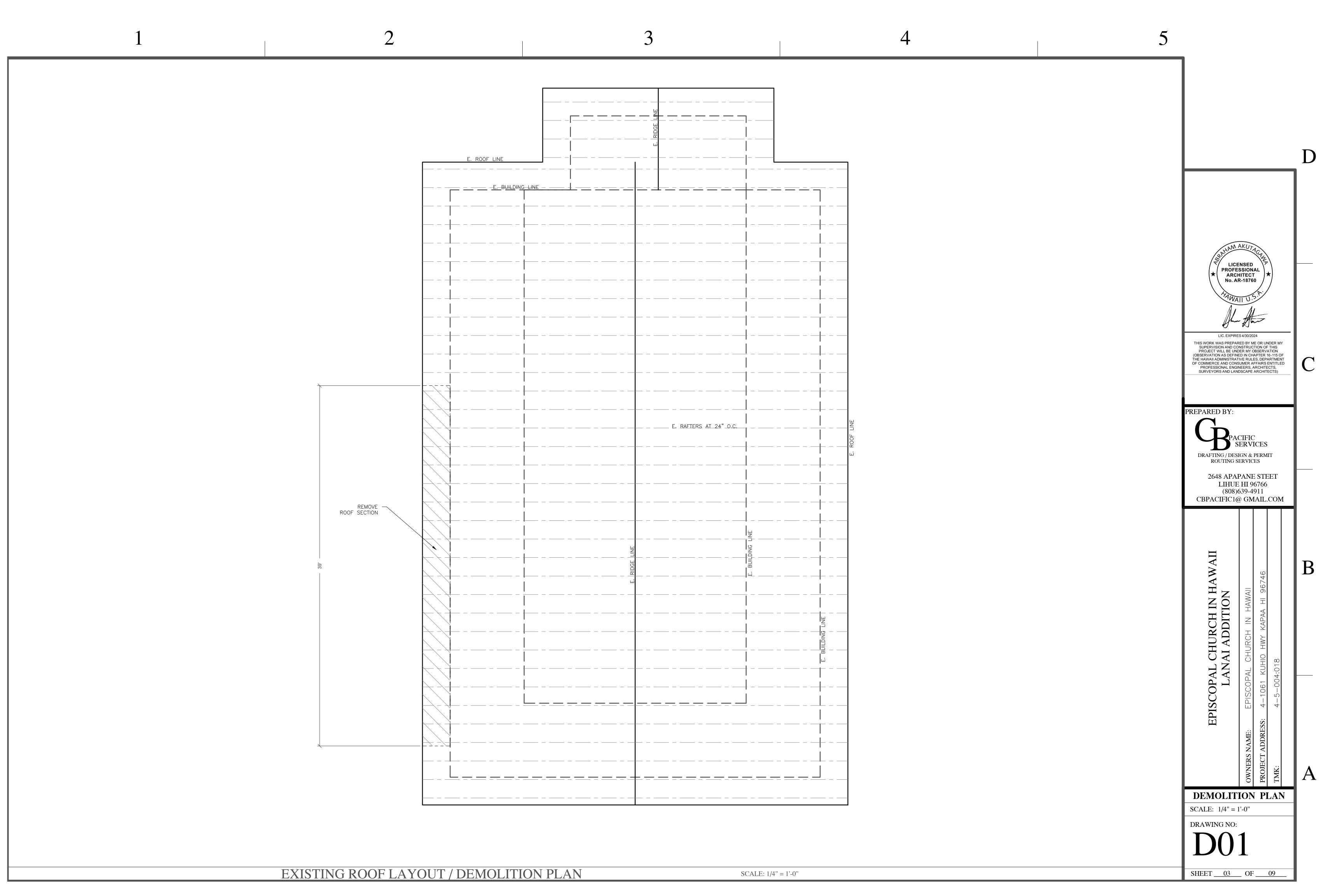
C. Partially enclosed and open occupancy R-3 buildings without wind-borne debris protection shall include a safe room designed and built in accordance with the County of Kaua'i Section U102 Hawai'i Residential Safe Room.

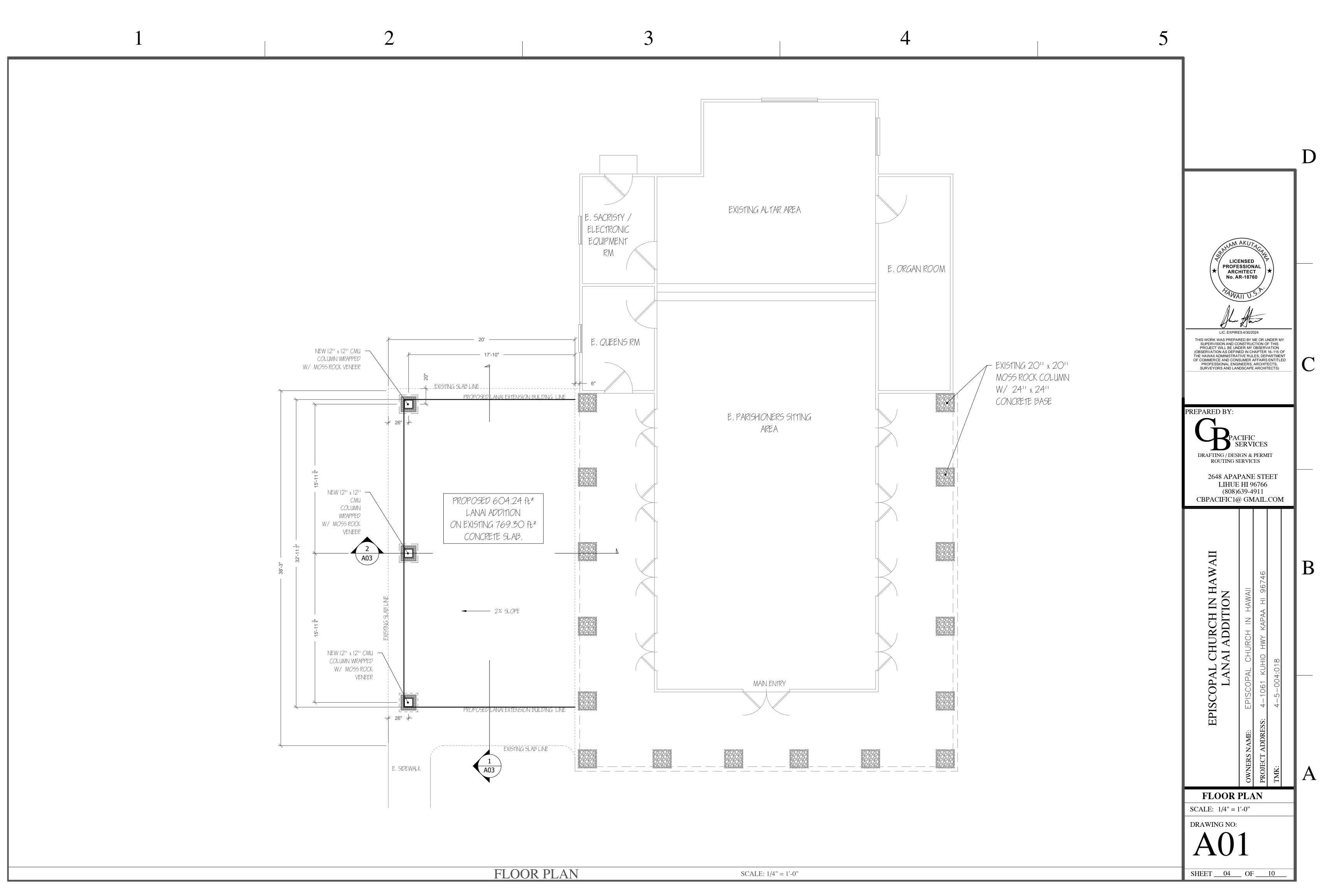
COUNTY OF KAUA'I CHAPTER 12 KAUA'I COUNTY BUILDING CODE KAUA'I COUNTY CODE 1987, AS AMENDED

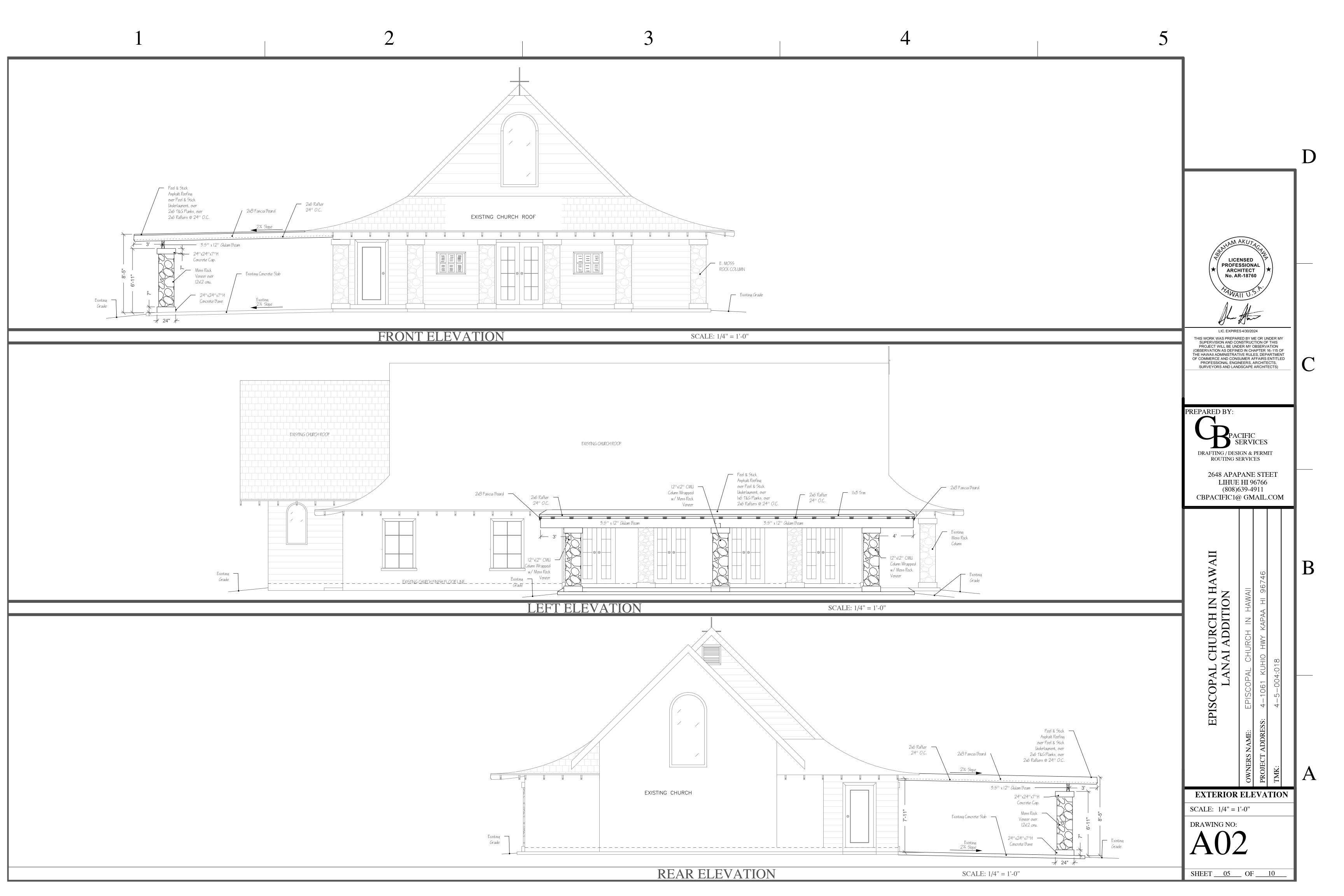
SHEET <u>01</u> OF <u>10</u>

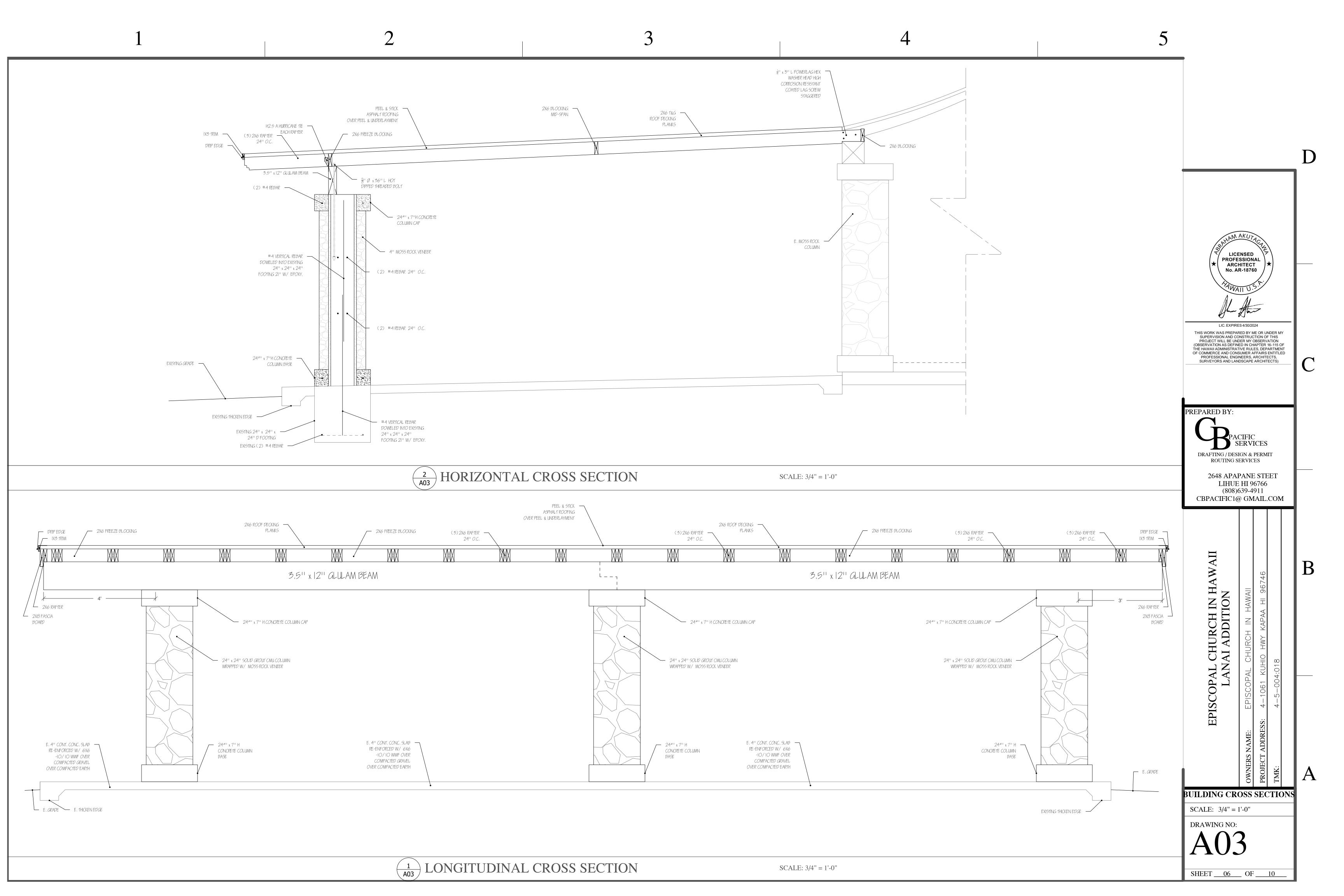
ARTICLE 6 - ENERGY CONSERVATION CODE					
To the best of my knowledge, this project's design substantially conforms to the re	esidential provi	sion of:			_
Section 12-6.3 Adoption of the International Energy Conservation (Section 12-6.4 Local Amendments to the IECC	Code (IECC)				
COMPLIANCE METHOD X Tropical Zone, R401.2.1 Prescriptive, R402 Prescriptive, R402 Roof and Wall Insulation R-value. Table R401.1.2 Conservation U-factor. Table R402.1.4 Total UA, R402.1.5 Points Option. R407 Simulated Performance Alternative, R405 Energy Rating Index Compliance Alternative, R408			★ PROFE	RED BY ME OR UNDE DNSTRUCTION OF TH DER MY OBSERVATIO IED IN CHAPTER 16-1 TIVE RULES, DEPART SUMER AFFAIRS ENT INEERS, ARCHITECT	ION 115 OF TMENT ITITLED TS,
INFORMATION IN CONSTRUCTION DOCUMENTS Envelope Roof insulation R-value Roof insulation type and location Roof membrane solar reflectance and thermal emittance Wall insulation R-value Wall insulation type and location Window and skylight SHGC Air leakage testing requirement Envelope Air conditioning equipment capacity and efficiency Programable thermostat Insulation R-value Duct leakage testing equipment Electrical Lighting fixture locations Lamp type Ceiling fans Whole-house fans NOTES: SIGNATURE: BAC SIGNATURE: AMAE: Abraham Akutagawa	YES X X X X X X X X X X X X X X X X X X	N/A	DRAFTING / DESIG SER 2648 APA LIHUE	NAME: EPISCOPAL CHURCH IN HAWAII ADDRESS: 4-1061 KUHIO HWY KAPAA HI 96746	EΤ
TITLE: Architect				OWNERS	TMK:
LICENSE NO: AR-18760			COVE		
			SCALE: NTS		
			DRAWING NO:	101	1

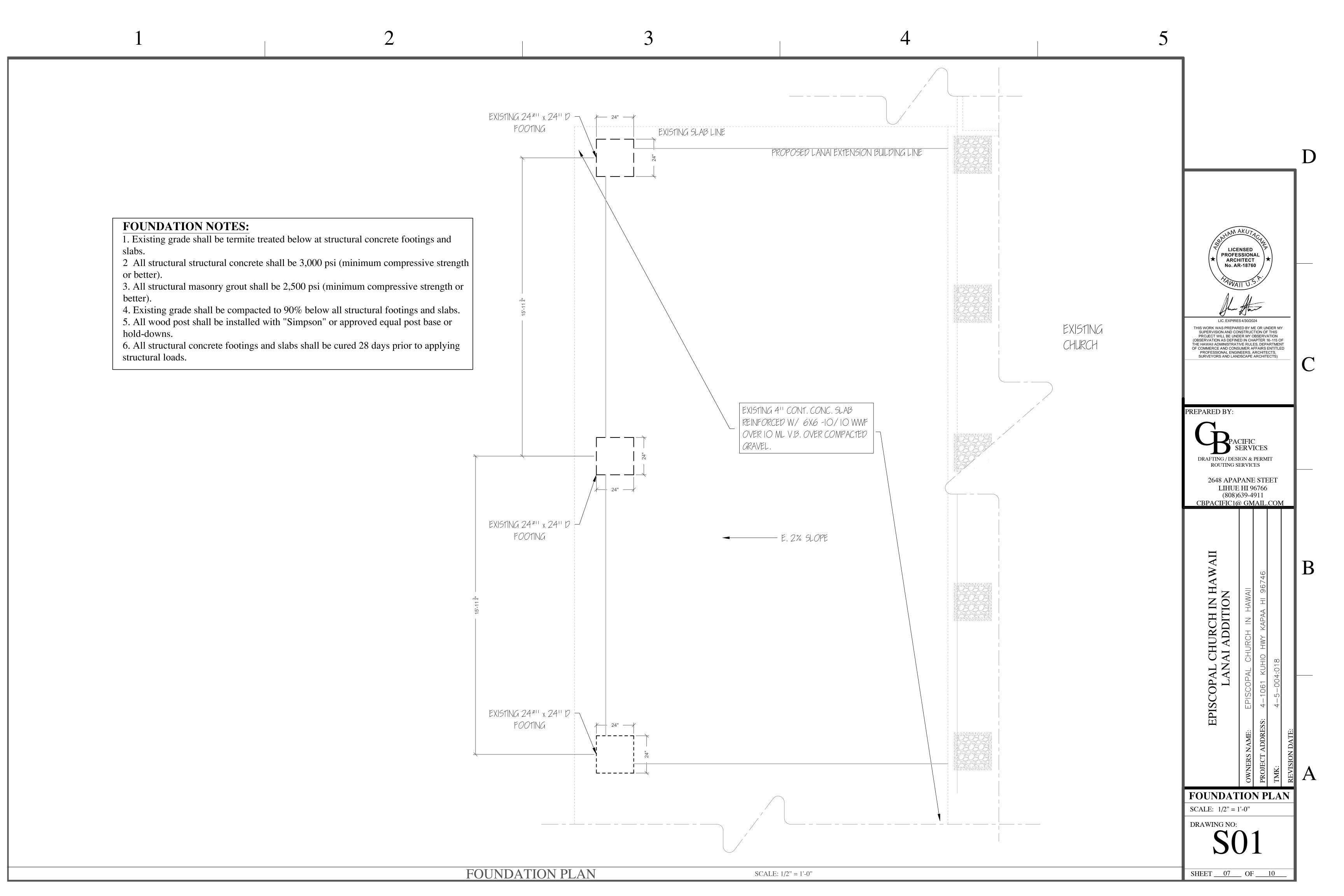


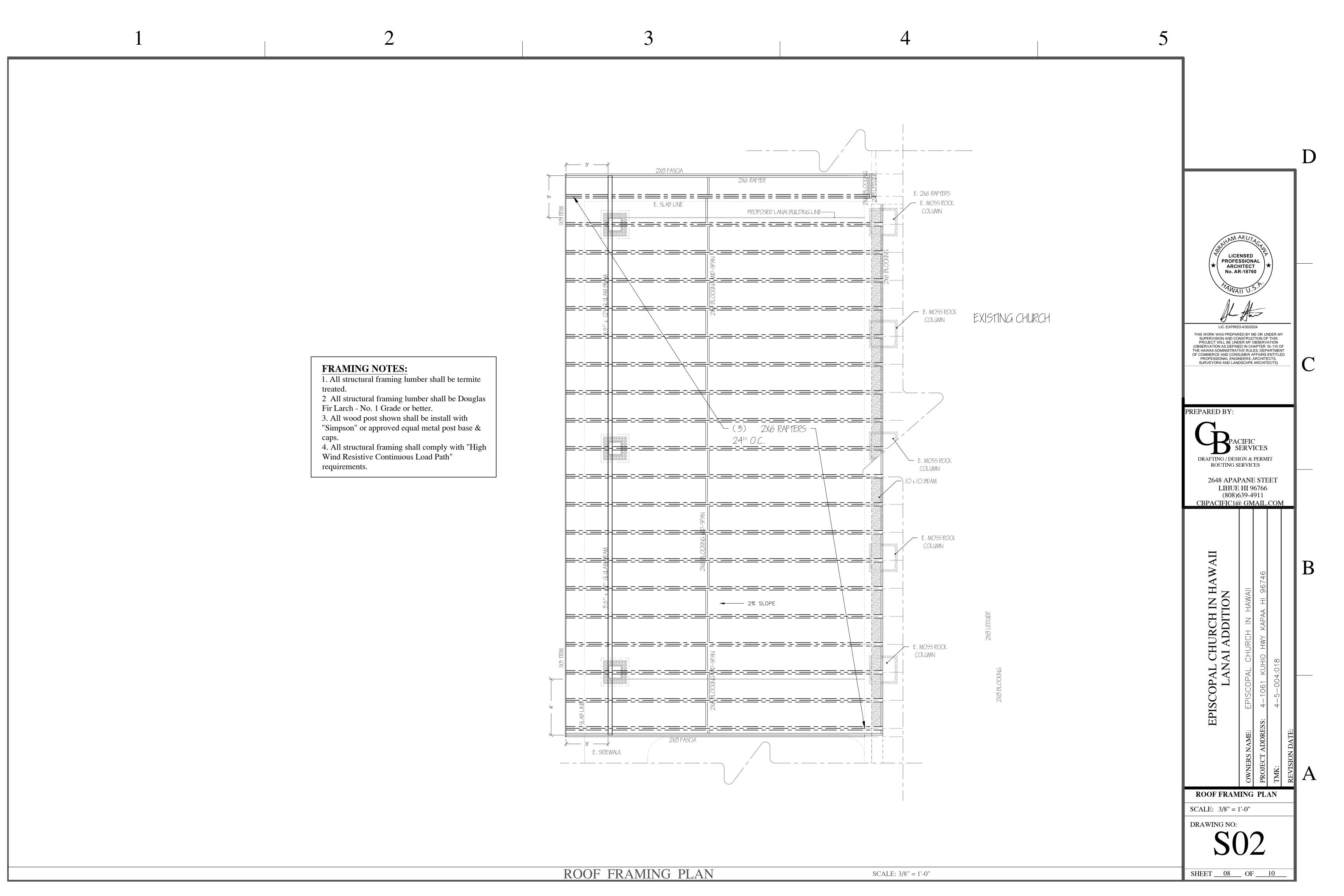


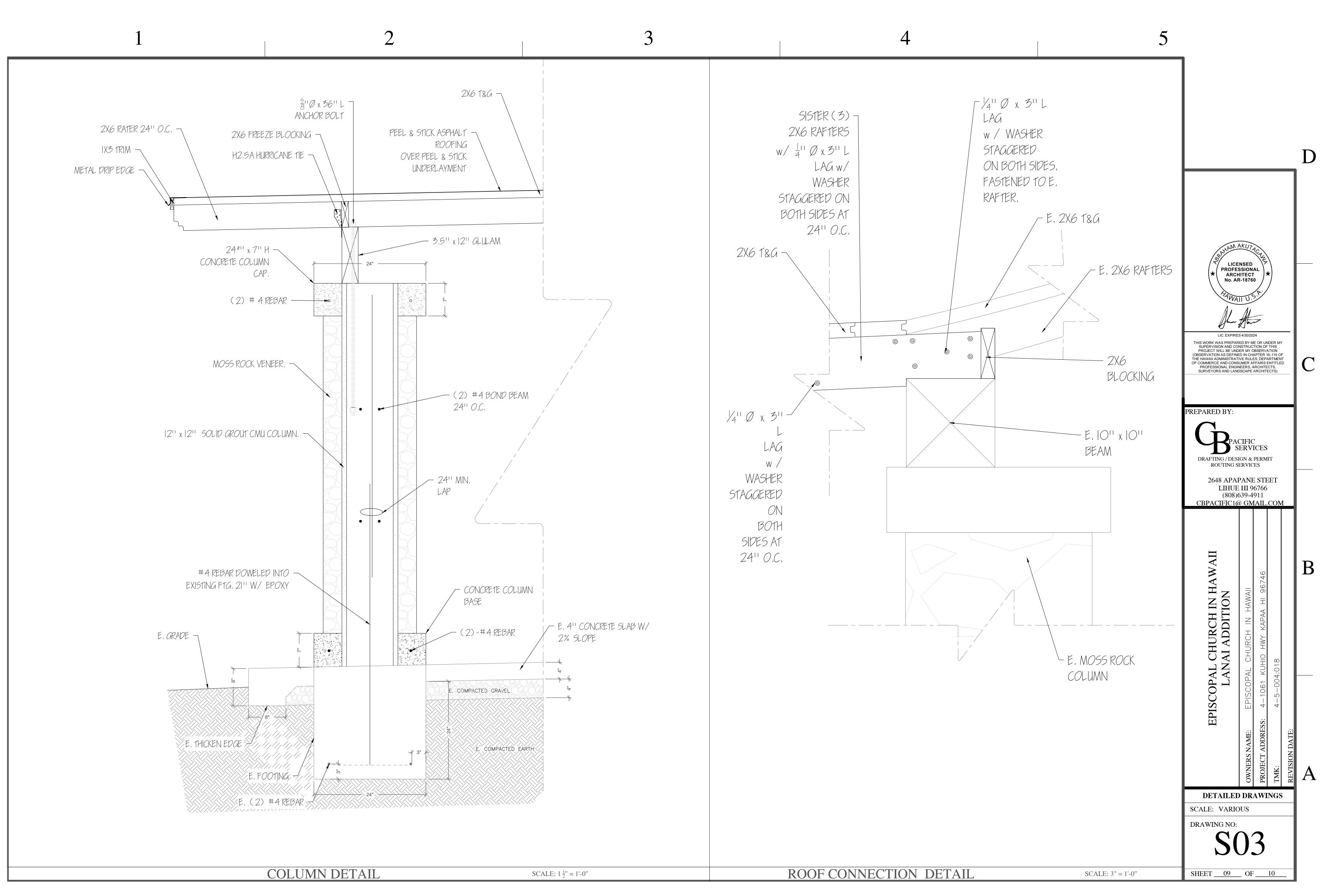


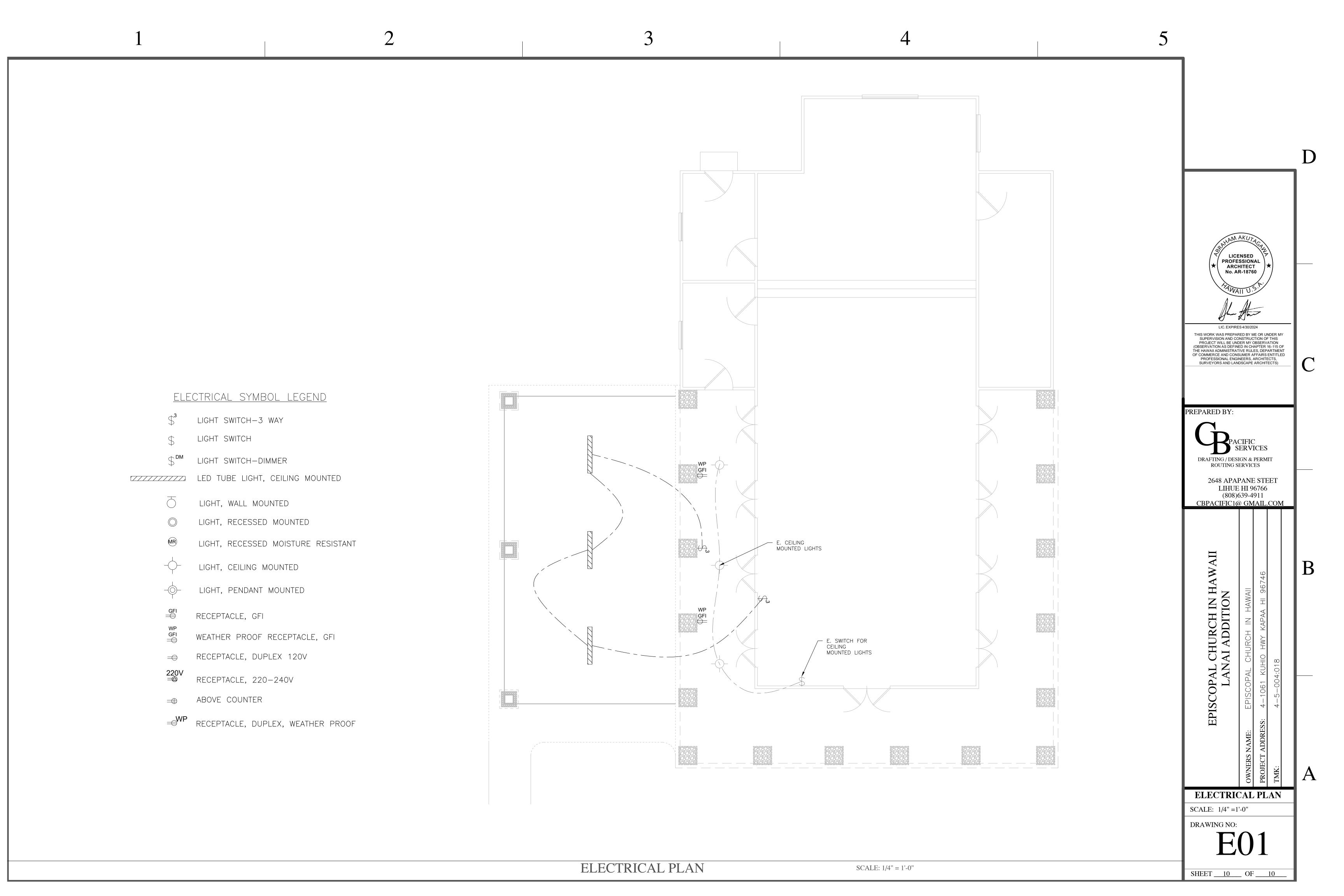












DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



Kaua'i County Historic Preservation Review Commission (KHPRC)

DIRECTOR'S REPORT

I. SUMMARY

Action Required by KHPRC:

Consideration of a Class IV Zoning Permit and a Use Permit for the proposed lanal addition to an existing historic church.

KHPRC action may include the following:

- 1) Support for the project as represented; or
- 2) A recommendation that its approval of the project should incorporate conditions of approval; or
- 3) A recommendation to consider denial of the permits; or
- 4) A recommendation to defer action on the permits

II. PROJECT INFORMATION

Permit Numbers	HPRC-2024-3 Class IV Zoning Permit Z-IV-2024-XX Use Permit U-2024-XX Building Permit BP-23-2244			
Parcel Location:	Kapa'a, Kaua'i			
Tax Map Key(s):	(4) 4-5-004:018	Area:	4.1075 acres/ 178,923 sq. ft.	
	LAND USE DESIGNATIONS	& VALU	ES	
Zoning:	R-10/ ST-P			
State Land Use District:	Urban			
General Plan Designation:	Neighborhood General			
Owner(s)/ Applicant:	Episcopal Church in Hawaiʻi			



III. PROJECT DESCRIPTION

The Applicant, the All Saints' Episcopal Church, is the owner of the subject property located in Kapa'a Town. The Applicant is proposing to construct a permanent lanai addition to replace a temporary tarp roof that was added in response to the COVID-19 restrictions. The church already has a 20 x 40 ft. concrete slab that was installed to the side of the church. The permanent lanai addition will give church members the option to sit outside and will add overflow seating to accommodate larger events such as weddings, funerals, and other church-related events.

Other church structures

In addition to the church building, there are other historic structures on the subject property including a cemetery, gym, memorial school building, rectory, columbarium, and a muti-use building. The proposed scope of work is limited to the church structure.

IV. TRIGGER FOR KHPRC REVIEW

Hawai'i Revised Statutes (HRS) §6E-2 defines "Historic property" as "any building, structure, object, district, area, or site, including heiau and underwater site, which is over fifty years old."

Hawai'i Administrative Rules Title 13 defines "Significant Historic Property" as "any historic property that meets the criteria" for listing on the Hawai'i Register of Historic Places under HAR 275-6(b) or HAR 2846(b).

Site/Building/Structure/Object <u>IS NOT</u> Listed on the National or State Historic Register.

The subject property is **NOT** located in a Historic District.

The church building <u>IS</u> over 50 years old and <u>IS</u> by law defined as a "historic property." The church was constructed in 1925 and is a 98-year-old building.

The subject property <u>IS</u> included on the KHPRC Inventory List. The KHPRC inventory list specifically mentions the church building and identifies the building as being in good condition.

V. PROJECT HISTORY AND BACKGROUND

Church History

According to the church website¹, the existing church was constructed in 1925 and was designed by Honolulu architect Guy Rothwell who designed other buildings on the church property.

Zoning Permit History

The Department maintains several zoning permits for the subject property (listed below), however; there are no zoning permits that specifically relate to modifications for the church building. In addition, there are no OEP/ Hurricane Iniki permits for any damage or repairs done to the church structure.

Table 1. Zoning Permit History

Year	Permit	Description
1961	R189	Extension to Kitchen
1962	R-548	Single Family Residence
1979	Z-IV-1979-35	New Multi-Purpose Building
1987	Z-219-1987	Single Family Residence
1989	Z-492-1989	Fence
1989	Z-968-1989	Storage Addition
1991	Z-1903-1991	Handicap Ramp for Gymnasium
1992	Z-1121-1992	Rock Wall/ Religious Facility
1995	Z-336-1995	Religious Facility Interior Reno/ Columbarium
		Improvements
2001	Z-955-2001	Single Family Residence
2002	Z-IV-2002-6	Private School
2007	Z-IV-2007-6	Bookstore, Gift Shop, and Lounge in the Gymnasium
2012	Z-447-2012	Accessory Use Walkway over tree roots
2014	Z-IV-2014-2	Community Market

VI. CRITERIA FOR NOMINATIONS TO THE HAWAI'I REGISTER OF HISTORIC PLACES

Although not listed, the subject property could be eligible for listing on the State or National Register. Pursuant to HAR Section 13-198-8, in deciding whether a property should be entered and ordered into the Hawai'i register, the review board

¹ All Saints Episcopal Church Website (https://www.allsaintskauai.org/church--campus.html)

shall evaluate whether the property meets or possesses, individually or in combination, the following criteria or characteristics:

- (1) The quality of significance in Hawaiian history, architecture, archeology, and culture, which is present in districts, sites, buildings, structures, and objects of State and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:
 - (A) That are associated with events that have made a significant contribution to broad patterns of our American or Hawaiian history.

The subject property <u>may</u> be associated with events that have made a significant contribution to broad patterns of our American or Hawaiian history. As represented on their website, the All Saints' Episcopal Church was the first Anglican Church that was established on Kauai.² However, more information may be needed to verify if the property is associated with a significant event or events to meet the requirements under this criteria point.

(B) That are associated with the lives of persons significant in our past.

The subject property <u>may be</u> associated with the lives of persons significant in our past. The church and other accessory buildings are situated on land that was donated by Mr. and Mrs. Henry Digby Sloggett- a well-known and established family on Kaua'i.³

Although the Sloggett's donated the land to the church, the Department does not know if they were actively associated with the church or church activities that occurred on the subject property. Further research would be needed to verify if the subject property is associated with the lives of persons significant in our past and if those persons would be considered "significant" in a local context.

(C) That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction.

² All Saints Episcopal Church Website (https://www.allsaintskauai.org/our-history.html)

³ All Saints Episcopal Church Website (https://www.allsaintskauai.org/our-history.html)

The subject property <u>is</u> likely to be eligible under Criteria C as being representative of a type, period, or method of construction and that represents the work of a master under Honolulu architect Guy Rothwell, who designed many buildings in Hawai'i.

The church building is a single-story, wood frame structure with a gable and hip roof. The exterior character defining features include gothic arched stained-glass windows, lava stone piers, 12-pane double doors with louvered vents, 6/6 double hung windows, and wood shingle roof and siding materials. The interior of the church also has character defining features such as the exposed beam trusses, stained glass windows, and the pipe organ.

Further research may be needed to verify the church's eligibility under Criteria C. The Department was unable to do thorough research comparing Rothwell's church design to other buildings he constructed during this time period. However, the Department predicts that Rothwell's church design may be representative of his other architectural designs in Hawai'i.

(D) That have yielded, or may be likely to yield, information important in prehistory or history.

Based on limited information available, the subject property **is unlikely** to yield information important in prehistory or history.

Therefore, the church structure is likely to meet the criteria for listing to the register primarily under Criteria C.

VII. HISTORIC INTEGRITY

The existing church building <u>retains a high level of historic integrity</u> through its location, setting, design, materials, workmanship, feeling, and association. Much of the original materials and the design of the building remain in excellent condition and the church structure continues to be recognizable over the years.

In addition to the exterior, there are a number of character defining features in the interior of the church such as the stain glass windows and the pipe organ that contain to maintain its historic significance through renovation and repairs over time.

VIII. SECRETARY OF INTERIOR STANDARDS FOR REHABILITATION

The National Park Service offers Preservation Brief #14 (see attached as Exhibit A) to provide guidance on new exterior additions to historic buildings. In summary, the proposal should take into consideration the following:

 Can the proposed addition be accommodated within the existing footprint in a manner that does not affect any character defining features of the interior space?

Department's Evaluation:

Based on the Department's review, additional seating would be difficult to accommodate within the existing footprint of the church due to the layout constraints and character-defining features within the interior of the church. The back portion of the church has an altar-like area that would be difficult for expansion. Therefore, accommodating the new addition within the interior layout of the existing church would prove to be infeasible.

- If an exterior addition is necessary, then the proposed addition should align with Standards 9 and 10 of the Standards for Rehabilitations which state:
- (9) New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- (10) New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Department's Evaluation:

Based on the Department's review, an exterior addition would be necessary; however, the proposed design of the exterior addition with lava rock columns and the extension of the hip roof may replicate the original historic building too much, thus making it difficult to distinguish between the old and the new. Although the Applicant's intent was to blend in with the existing historic character, the proposed design may be in conflict with the Secretary of Interior guidelines.

The Applicant may want to consider alternative designs that may involve the following: 1) separate connector between buildings; 2) alternative designs that are compatible to the existing historic character, but still distinguishable so that it does not copycat the original historic character. The Department has provided a copy of National Bulletin Register #14 to the Applicant for their review and consideration in thinking about alternative architectural designs to further distinguish between the original architectural style and the new addition.

IX. ADDITIONAL FINDINGS

- The church building is likely to be historically significant under Criteria C and for retaining a high level of integrity. Therefore, the proposed lanai addition could be an effect to the existing historic church building.
- The Applicant should reconsider their architectural design to adhere more to the guidance provided by the Secretary of Interior Standards outlined in the National Register Bulletin #14.

X. RECOMMENDATION

Based on the foregoing evaluation, the Planning Department recommends that the Kaua'i Historic Preservation Review Commission <u>SUPPORT the project with the following modifications that take into consideration the following:</u>

 Explores and exhausts alternative designs that comply with the Secretary of Interior Standards of Rehabilitation. Specifically, the Applicant should reconsider the architectural styles of the lanai addition in a manner that would be compatible, but distinguishable from the original historic character of the church building.

The Commission is further advised that this report does not represent the Planning Department's final recommendation in view of the forthcoming public hearing process whereby the entire record should be considered prior to decision making. The entire record includes but is not limited to:

- a. Government agency comments;
- b. Testimony from the general public and interested others; and

c. The land owner's response.

MARISA VALENCIANO

Planner

Approved & Recommended to Commission:

Bv

JODLA. HIGUCHI SAYAGUSA

Deputy Director of Planning

Date:

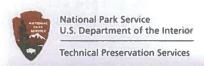
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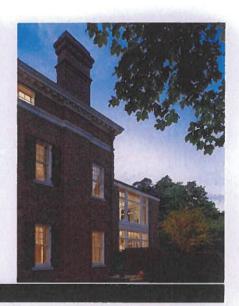
EXHIBIT "A"

14 PRESERVATION BRIEFS

New Exterior Additions to Historic Buildings: Preservation Concerns

Anne E. Grimmer and Kay D. Weeks





A new exterior addition to a historic building should be considered in a rehabilitation project only after determining that requirements for the new or adaptive use cannot be successfully met by altering nonsignificant interior spaces. If the new use cannot be accommodated in this way, then an exterior addition may be an acceptable alternative. Rehabilitation as a treatment "is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."

The topic of new additions, including rooftop additions, to historic buildings comes up frequently, especially as it

Figure 1. The addition to the right with its connecting hyphen is compatible with the Collegiate Gothic-style library. The addition is set back from the front of the library and uses the same materials and a simplified design that references, but does not copy, the historic building. Photo: David Wakely Photography.

relates to rehabilitation projects. It is often discussed and it is the subject of concern, consternation, considerable disagreement and confusion. Can, in certain instances, a historic building be enlarged for a new use without destroying its historic character? And, just what is significant about each particular historic building that should be preserved? Finally, what kind of new construction is appropriate to the historic building?

The vast amount of literature on the subject of additions to historic buildings reflects widespread interest as well as divergence of opinion. New additions have been discussed by historians within a social and political framework; by architects and architectural historians in terms of construction technology and style; and

by urban planners as successful or unsuccessful contextual design. However, within the historic preservation and rehabilitation programs of the National Park Service, the focus on new additions is to ensure that they preserve the character of historic buildings.

Most historic districts or neighborhoods are listed in the National Register of Historic Places for their significance within a particular time frame. This period of significance of historic districts as well as individually-listed properties may sometimes lead to a misunderstanding that inclusion in the National Register may prohibit any physical change outside of a certain historical period - particularly in the form of exterior additions. National Register listing does not mean that a building or district is frozen in time and that no change can be made without compromising the historical significance. It does mean, however, that a new addition to a historic building should preserve its historic character.



Figure 2. The new section on the right is appropriately scaled and reflects the design of the historic Art Deco-style hotel. The apparent separation created by the recessed connector also enables the addition to be viewed as an individual building.

Guidance on New Additions

To meet Standard 1 of the Secretary of the Interior's Standards for Rehabilitation, which states that "a property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment," it must be determined whether a historic building can accommodate a new addition. Before expanding the building's footprint, consideration should first be given to incorporating changes—such as code upgrades or spatial needs for a new use—within secondary areas of the historic building. However, this is not always possible and, after such an evaluation, the conclusion may be that an addition is required, particularly if it is needed to avoid modifications to character-defining interior spaces. An addition should be designed to be compatible with the historic character of the building and, thus, meet the Standards for Rehabilitation. Standards 9 and 10 apply specifically to new additions:

- (9) "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."
- (10) "New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

The subject of new additions is important because a new addition to a historic building has the potential to change its historic character as well as to damage and destroy significant historic materials and features. A new addition also has the potential to confuse the public and to make it difficult or impossible to differentiate the old from the new or to recognize what part of the historic building is genuinely historic.

The intent of this Preservation Brief is to provide guidance to owners, architects and developers on how to design a compatible new addition, including a rooftop addition, to a historic building. A new addition to a historic building should preserve the building's historic character. To accomplish this and meet the Secretary of the Interior's Standards for Rehabilitation, a new addition should:

- Preserve significant historic materials, features and form;
- Be compatible; and
- · Be differentiated from the historic building.

Every historic building is different and each rehabilitation project is unique. Therefore, the guidance offered here is not specific, but general, so that it can be applied to a wide variety of building types and situations. To assist in interpreting this guidance, illustrations of a variety of new additions are provided. Good examples, as well as some that do not meet the Standards, are included to further help explain and clarify what is a compatible new addition that preserves the character of the historic building.



Figure 3. The red and buff-colored parking addition with a rooftop playground is compatible with the early-20th century school as well as with the neighborhood in which it also serves as infill in the urban setting.

Preserve Significant Historic Materials, Features and Form

Attaching a new exterior addition usually involves some degree of material loss to an external wall of a historic building, but it should be minimized. Damaging or destroying significant materials and craftsmanship should be avoided, as much as possible.

Generally speaking, preservation of historic buildings inherently implies minimal change to primary or "public" elevations and, of course, interior features as well. Exterior features that distinguish one historic building or a row of buildings and which can be seen from a public right of way, such as a street or sidewalk, are most likely to be the most significant. These can include many different elements, such as: window patterns, window hoods or shutters; porticoes, entrances and doorways; roof shapes, cornices and decorative moldings; or commercial storefronts with their special detailing, signs and glazing patterns. Beyond a single building, entire blocks of urban or residential structures are often closely related architecturally by their materials, detailing, form and alignment. Because significant materials and features should be preserved, not damaged or hidden, the first place to consider placing a new addition is in a location where the least amount of historic material and character-defining features will be lost. In most cases, this will be on a secondary side or rear elevation.

One way to reduce overall material

loss when constructing a new addition is simply to keep the addition smaller in proportion to the size of the historic building. Limiting the size and number of openings between old and new by utilizing existing doors or enlarging windows also helps to minimize loss. An often successful way to accomplish this is to link the addition to the historic building by means of a hyphen or connector. A connector provides a physical link while visually separating the old and new, and the connecting passageway penetrates and removes only a small portion of the historic wall. A new addition that will abut the historic building along an entire elevation or wrap around a side and rear elevation, will likely integrate the historic and the new interiors, and thus result in a high degree of loss of form and exterior walls, as well as significant alteration of interior spaces and features, and will not meet the Standards.





Figure 4. This glass and brick structure is a harmonious addition set back and connected to the rear of the Colonial Revival-style brick house. Cunningham/Quill Architects. Photos: © Maxwell MacKenzie.

Compatible but Differentiated Design

In accordance with the Standards, a new addition must preserve the building's historic character and, in order to do that, it must be differentiated, but compatible, with the historic building. A new addition must retain the essential form and integrity of the historic property. Keeping the addition smaller, limiting the removal of historic materials by linking the addition with a hyphen, and locating the new addition at the rear or on an inconspicuous side elevation of a historic building are techniques discussed previously that can help to accomplish this.

Rather than differentiating between old and new, it might seem more in keeping with the historic character

simply to repeat the historic form, material, features and detailing in a new addition. However, when the new work is highly replicative and indistinguishable from the old in appearance, it may no longer be possible to identify the "real" historic building. Conversely, the treatment of the addition should not be so different that it becomes the primary focus. The difference may be subtle, but it must be clear. A new addition to a historic building should protect those visual qualities that make the building eligible for listing in the National Register of Historic Places.

The National Park Service policy concerning new additions to historic buildings, which was adopted in 1967, is not unique. It is an outgrowth and continuation of a general philosophical approach to change first expressed by John Ruskin in England in the 1850s, formalized by William Morris in the founding of the Society for the Protection of Ancient Buildings in 1877, expanded by the Society in 1924 and, finally, reiterated in the 1964 Venice Charter-a document that continues to be followed by the national committees of the International Council on Monuments and Sites (ICOMOS). The 1967 Administrative Policies for Historical Areas of the National Park System direct that "...a modern addition should be readily distinguishable from the older work; however, the new work should be harmonious with the old in scale, proportion, materials, and color. Such additions should be as inconspicuous as possible from the public view." As a logical evolution from these Policies specifically for National Park Service-owned historic structures, the 1977 Secretary of the Interior's Standards for Rehabilitation, which may be applied to all historic buildings listed in, or eligible for listing in the National Register, also state that "the new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

Preserve Historic Character

The goal, of course, is a new addition that preserves the building's historic character. The historic character of each building may be different, but the methodology of establishing it remains the same. Knowing the uses and functions a building has served over time will assist in making what is essentially a physical evaluation. But, while written and pictorial documentation can provide a framework for establishing the building's history, to a large extent the historic character is embodied in the physical aspects of the historic building itself—shape, materials, features, craftsmanship, window arrangements, colors, setting and interiors. Thus, it is important to identify the historic character before making decisions about the extent—or limitations—of change that can be made.

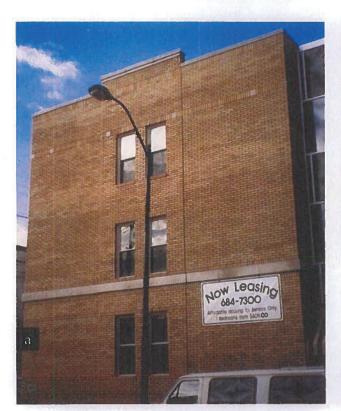


Figure 5. This addition (a) is constructed of matching brick and attached by a recessed connector (b) to the 1914 apartment building (c). The design is compatible and the addition is smaller and subordinate to the historic building (d).











Figure 6. A new addition (left) is connected to the garage which separates it from the main block of the c. 1910 former florist shop (right). The addition is traditional in style, yet sufficiently restrained in design to distinguish it from the historic building.

A new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building. An addition that bears no relationship to the proportions and massing of the historic building—in other words, one that overpowers the historic form and changes the scale will usually compromise the historic character as well. The appropriate size for a new addition varies from building to building; it could never be stated in a square or cubic footage ratio, but the historic building's existing proportions, site and setting can help set some general parameters for enlargement. Although even a small addition that is poorly designed can have an adverse impact, to some extent, there is a predictable relationship between the size of the historic resource and what is an appropriate size for a compatible new addition.

Generally, constructing the new addition on a secondary side or rear elevation—in addition to material preservation—will also preserve the historic character. Not only will the addition be less visible, but because a secondary elevation is usually simpler and less distinctive, the addition will have less of a physical and visual impact on the historic building. Such placement will help to preserve the building's historic form and relationship to its site and setting.

Historic landscape features, including distinctive grade variations, also need to be respected. Any new landscape features, including plants and trees, should be kept at a scale and density that will not interfere with understanding of the historic resource itself. A traditionally landscaped

property should not be covered with large paved areas for parking which would drastically change the character of the site.

Despite the fact that in most cases it is recommended that the new addition be attached to a secondary elevation, sometimes this is not possible. There simply may not be a secondary elevation—some important freestanding buildings have significant materials and features on all sides. A structure or group of structures together with its setting (for example, a college campus) may be of such significance that any new addition would not only damage materials, but alter the buildings' relationship to each other and the setting. An addition attached to a highly-visible elevation of a historic building can radically alter the historic form or obscure features such as a decorative cornice or window ornamentation. Similarly, an addition that fills



Figure 7. A vacant side lot was the only place a new stair tower could be built when this 1903 theater was rehabilitated as a performing arts center. Constructed with matching materials, the stair tower is set back with a recessed connector and, despite its prominent location, it is clearly subordinate and differentiated from the historic theater.

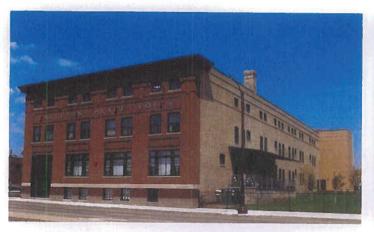




Figure 8. The rehabilitation of this large, early-20th century warehouse (left) into affordable artists' lofts included the addition of a compatible glass and brick elevator/stair tower at the back (right).



Figure 9. A simple, brick stair tower replaced two non-historic additions at the rear of this 1879 school building when it was rehabilitated as a women's and children's shelter. The addition is set back and it is not visible from the front of the school.



Figure 10. The small size and the use of matching materials ensures that the new addition on the left is compatible with the historic Romanesque Revival-style building.

in a planned void on a highly-visible elevation (such as a U-shaped plan or a feature such as a porch) will also alter the historic form and, as a result, change the historic character. Under these circumstances, an addition would have too much of a negative impact on the historic building and it would not meet the Standards. Such situations may best be handled by constructing a separate building in a location where it will not adversely affect the historic structure and its setting.

In other instances, particularly in urban areas, there may be no other place but adjacent to the primary façade to locate an addition needed for the new use. It may be possible to design a lateral addition attached on the side that is compatible with the historic building, even though it is a highly-visible new element. Certain types of historic structures, such as government buildings, metropolitan museums, churches or libraries, may be so massive in size that a relatively largescale addition may not compromise the historic character, provided, of course, the addition is smaller than the historic building. Occasionally, the visible size of an addition can be reduced by placing some of the spaces or support systems in a part of the structure that is underground. Large new additions may sometimes be successful if they read as a separate volume, rather than as an extension of the historic structure, although the scale, massing and proportions of the addition still need to be compatible with the historic building. However, similar expansion of smaller buildings would be dramatically out of scale. In summary, where any new addition is proposed, correctly assessing the relationship between actual size and relative scale will be a key to preserving the character of the historic building.

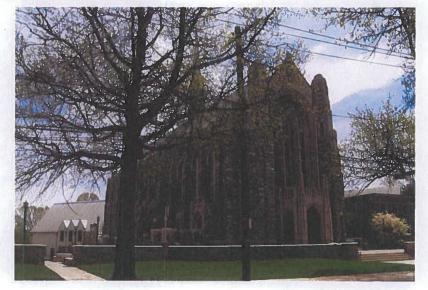


Figure 11. The addition to this early-20th century Gothic Revival-style church provides space for offices, a great hall for gatherings and an accessible entrance (left). The stucco finish, metal roof, narrow gables and the Gothic-arched entrance complement the architecture of the historic church. Placing the addition in back where the ground slopes away ensures that it is subordinate and minimizes its impact on the church (below).

Design Guidance for Compatible New Additions to Historic Buildings

There is no formula or prescription for designing a new addition that meets the Standards. A new addition to a historic building that meets the Standards can be any architectural style—traditional, contemporary or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility in order to maintain the historic character and the identity of the building being enlarged. New additions that too closely resemble the historic building or are in extreme contrast to it fall short of this balance. Inherent in all of the guidance is the concept that an addition needs to be subordinate to the historic building.

A new addition must preserve significant historic materials, features and form, and it must be compatible but differentiated from the historic building. To achieve this, it is necessary to carefully consider the placement or location of the new addition, and its size, scale and massing when planning a new addition. To preserve a property's historic character, a new addition must be visually distinguishable from the historic building. This does not mean that the addition and the historic building should be glaringly different in terms of design, materials and other visual qualities. Instead, the new addition should take its design cues from, but not copy, the historic building.



A variety of design techniques can be effective ways to differentiate the new construction from the old, while respecting the architectural qualities and vocabulary of the historic building, including the following:

- Incorporate a simple, recessed, small-scale hyphen to physically separate the old and the new volumes or set the addition back from the wall plane(s) of the historic building.
- Avoid designs that unify the two volumes into a single architectural whole. The new addition may include simplified architectural features that reflect, but do not duplicate, similar features on the historic building. This approach will not impair the existing building's historic character as long as the new structure is subordinate in size and clearly differentiated and distinguishable so that the identity of the historic structure is not lost in a new and larger composition. The historic building must be clearly identifiable and its physical integrity must not be compromised by the new addition.





Figure 12. This 1954 synagogue (left) is accessed through a monumental entrance to the right. The new education wing (far right) added to it features the same vertical elements and color and, even though it is quite large, its smaller scale and height ensure that it is secondary to the historic resource.



Figure 13. A glass and metal structure was constructed in the courtyard as a restaurant when this 1839 building was converted to a hotel. Although such an addition might not be appropriate in a more public location, it is compatible here in the courtyard of this historic building.



Figure 14. This glass addition was erected at the back of an 1895 former brewery during rehabilitation to provide another entrance. The addition is compatible with the plain character of this secondary elevation.

- Use building materials in the same color range or value as those of the historic building. The materials need not be the same as those on the historic building, but they should be harmonious; they should not be so different that they stand out or distract from the historic building. (Even clear glass can be as prominent as a less transparent material. Generally, glass may be most appropriate for small-scale additions, such as an entrance on a secondary elevation or a connector between an addition and the historic building.)
- Base the size, rhythm and alignment of the new addition's window and door openings on those of the historic building.
- Respect the architectural expression of the historic building type. For example, an addition to an institutional building should maintain the architectural character associated with this building type rather than using details and elements typical of residential or other building types.

These techniques are merely examples of ways to differentiate a new addition from the historic building while ensuring that the addition is compatible with it. Other ways of differentiating a new addition from the historic building may be used as long as they maintain the primacy of the historic building. Working within these basic principles still allows for a broad range of architectural expression that can range from stylistic similarity to contemporary distinction. The recommended design approach for an addition is one that neither copies the historic building exactly nor stands in stark contrast to it.

Revising an Incompatible Design for a New Addition to Meet the Standards

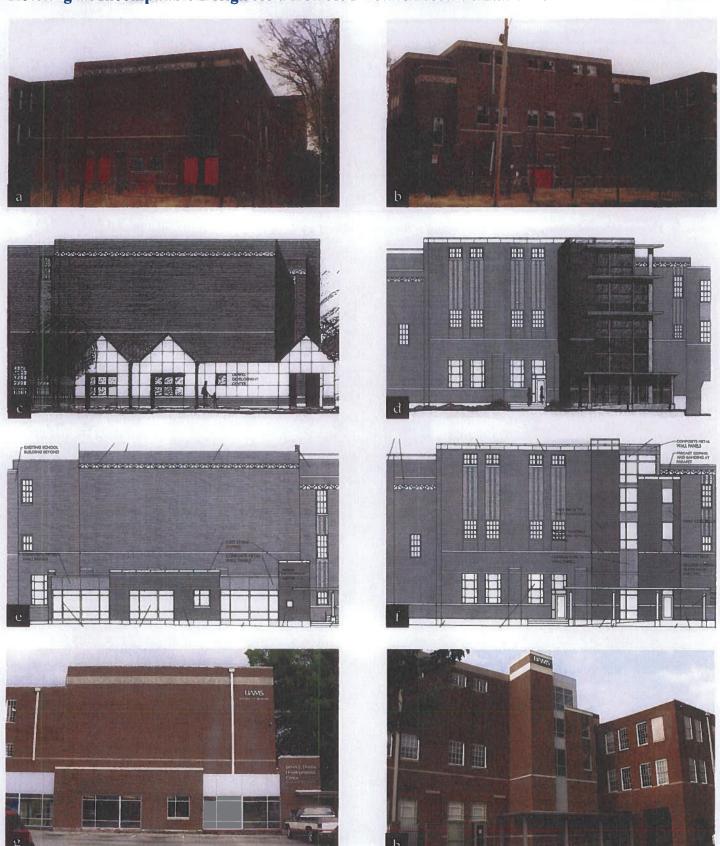


Figure 15. The rehabilitation of a c. 1930 high school auditorium for a clinic and offices proposed two additions: a one-story entrance and reception area on this elevation (a); and a four-story elevator and stair tower on another side (b). The gabled entrance (c) first proposed was not compatible with the flat-roofed auditorium and the design of the proposed stair tower (d) was also incompatible and overwhelmed the historic building. The designs were revised (e-f) resulting in new additions that meet the Standards (g-h).

Incompatible New Additions to Historic Buildings

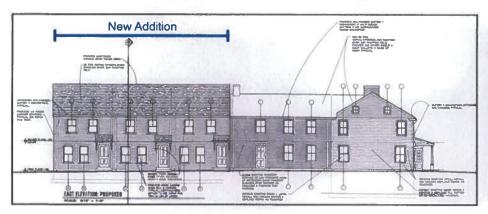


Figure 16. The proposal to add three row houses to the rear ell of this early-19th century residential property doubles its size and does not meet the Standards..



Figure 17. The small addition on the left is starkly different and it is not compatible with the eclectic, late-19th century house.





Figure 18. The expansion of a one- and one-half story historic bungalow (left) with a large two-story rear addition (right) has greatly altered and obscured its distinctive shape and form.

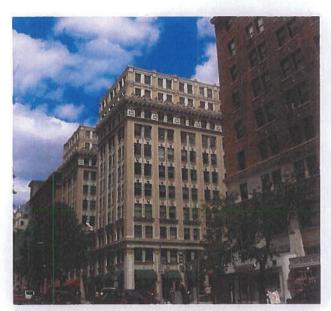
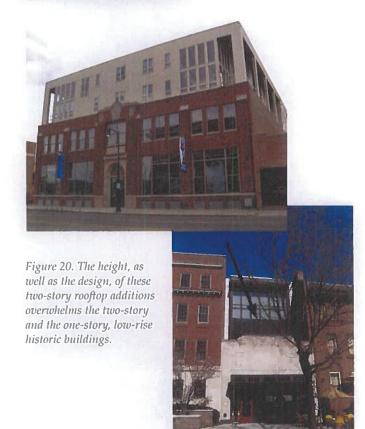


Figure 19. The upper two floors of this early-20th century office building were part of the original design, but were not built. During rehabilitation, the two stories were finally constructed. This treatment does not meet the Standards because the addition has given the building an appearance it never had historically.



New Additions in Densely-Built Environments

In built-up urban areas, locating a new addition on a less visible side or rear elevation may not be possible simply because there is no available space. In this instance, there may be alternative ways to help preserve the historic character. One approach when connecting a new addition to a historic building on a primary elevation is to use a hyphen to separate them. A subtle variation in material, detailing and color may also provide the degree of differentiation necessary to avoid changing the essential proportions and character of the historic building.

A densely-built neighborhood such as a downtown commercial core offers a particular opportunity to design an addition that will have a minimal impact on the historic building. Often the site for such an addition is a vacant lot where another building formerly stood. Treating the addition as a separate or infill building may be the best approach when designing an addition that will have the least impact on the historic building and the district. In these instances there may be no need for a direct visual link to the historic building. Height and setback from the street should generally be consistent with those of the historic building and other surrounding buildings in the district. Thus, in most urban commercial areas the addition should not be set back from the façade of the historic building. A tight urban setting may sometimes even accommodate a larger addition if the primary elevation is designed to give the appearance of being several buildings by breaking up the facade into elements that are consistent with the scale of the historic building and adjacent buildings.



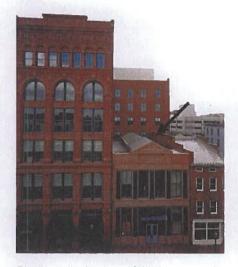




Figure 21. Both wings of this historic L-shaped building (top), which fronts on two city streets, adjoined vacant lots. A two-story addition was constructed on one lot (above, left) and a six-story addition was built on the other (above, right). Like the historic building, which has two different facades, the compatible new additions are also different and appear to be separate structures rather than part of the historic building.

New Addition



Figure 22. The proposed new addition is compatible with the historic buildings that remain on the block. Its design with multiple storefronts helps break up the mass.



Rooftop Additions

The guidance provided on designing a compatible new addition to a historic building applies equally to new rooftop additions. A rooftop addition should preserve the character of a historic building by preserving historic materials, features and form; and it should be compatible but differentiated from the historic building.

However, there are several other design principles that apply specifically to rooftop additions. Generally, a rooftop addition should not be more than one story in height to minimize its visibility and its impact on the proportion and profile of the historic building. A rooftop addition should almost always be set back at least one full bay from the primary elevation of the building, as well as from the other elevations if the building is free-standing or highly visible.

It is difficult, if not impossible, to minimize the impact of adding an entire new floor to relatively low buildings, such as small-scale residential or commercial structures, even if the new addition is set back from the plane of the façade. Constructing another floor on top of a small, one, two or three-story building is seldom appropriate for buildings of this size as it would measurably alter the building's proportions and profile, and negatively impact its historic character. On the other hand, a rooftop addition on an eight-story building, for example, in a historic district consisting primarily of tall buildings might not affect the historic character because the new construction may blend in with the surrounding buildings and be only minimally visible within the district. A rooftop addition in a densely-built urban area is more likely to be compatible on a building that is adjacent to similarly-sized or taller buildings.

A number of methods may be used to help evaluate the effect of a proposed rooftop addition on a historic building and district, including pedestrian sight lines, three-dimensional schematics and computer-generated design. However, drawings generally do not provide a true "picture" of the appearance and visibility of a proposed rooftop addition. For this reason, it is often necessary to construct a rough, temporary, full-size or skeletal mock up of a portion of the proposed addition, which can then be photographed and evaluated from critical vantage points on surrounding streets.







Figure 23. Colored flags marking the location of a proposed penthouse addition (a) were placed on the roof to help evaluate the impact and visibility of an addition planned for this historic furniture store (b). Based on this evaluation, the addition was constructed as proposed. It is minimally visible and compatible with the 1912 structure (c). The tall parapet wall conceals the addition from the street below (d).

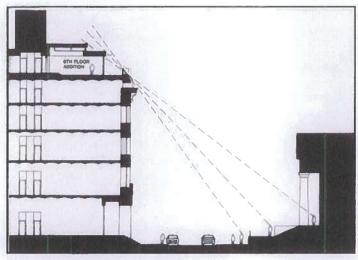


Figure 24. How to Evaluate a Proposed Rooftop Addition.

A sight-line study (above) only factors in views from directly across the street, which can be very restrictive and does not illustrate the full effect of an addition from other public rights of way. A mock up (above, right) or a mock up enhanced by a computer-generated rendering (below, right) is essential to evaluate the impact of a proposed rooftop addition on the historic building.

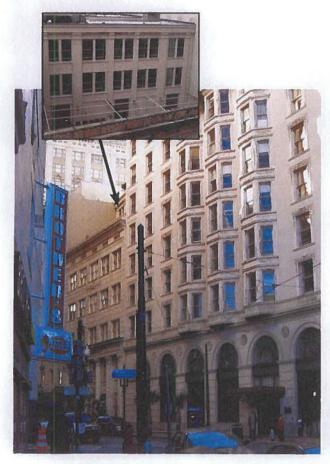


Figure 25. It was possible to add a compatible, three-story, penthouse addition to the roof of this five-story, historic bank building because the addition is set far back, it is surrounded by taller buildings and a deep parapet conceals almost all of the addition from below.





Figure 26. A rooftop addition would have negatively impacted the character of the primary facade (right) of this mid-19th century, four-story structure and the low-rise historic district. However, a third floor was successfully added on the two-story rear portion (below) of the same building with little impact to the building or the district because it blends in with the height of the adjacent building.









Figure 27. Although the new brick stair/elevator tower (left) is not visible from the front (right), it is on a prominent side elevation of this 1890 stone bank. The compatible addition is set back and does not compete with the historic building. Photos: Chadd Gossmann, Aurora Photography, LLC.

Designing a New Exterior Addition to a Historic Building

This guidance should be applied to help in designing a compatible new addition that that will meet the Secretary of the Interior's Standards for Rehabilitation:

- A new addition should be simple and unobtrusive in design, and should be distinguished from the historic building—a recessed connector can help to differentiate the new from the old.
- A new addition should not be highly visible from the public right of way; a rear or other secondary elevation is usually the best location for a new addition.
- The construction materials and the color of the new addition should be harmonious with the historic building materials.
- The new addition should be smaller than the historic building—it should be subordinate in both size and design to the historic building.

The same guidance should be applied when designing a compatible **rooftop** addition, plus the following:

- A rooftop addition is generally not appropriate for a one, two or three-story building—and often is not appropriate for taller buildings.
- A rooftop addition should be minimally visible.
- Generally, a rooftop addition must be set back at least one full bay from the primary elevation of the building, as well as from the other elevations if the building is freestanding or highly visible.
- Generally, a rooftop addition should not be more than one story in height.
- Generally, a rooftop addition is more likely to be compatible on a building that is adjacent to similarly-sized or taller buildings.





Figure 28. A small addition (left) was constructed when this 1880s train station was converted for office use. The paired doors with transoms and arched windows on the compatible addition reflect, but do not replicate, the historic building (right).





Figure 29. This simple glass and brick entrance (left) added to a secondary elevation of a 1920s school building (right) is compatible with the original structure.

Summary

Because a new exterior addition to a historic building can damage or destroy significant materials and can change the building's character, an addition should be considered only after it has been determined that the new use cannot be met by altering non-significant, or secondary, interior spaces. If the new use cannot be met in this way, then an attached addition may be an acceptable alternative if carefully planned and designed. A new addition to a historic building should be constructed in a manner that preserves significant materials, features and form, and preserves the building's historic character. Finally, an addition should be differentiated from the historic building so that the new work is compatible with—and does not detract from—the historic building, and cannot itself be confused as historic.

Additional Reading

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Figure 30. The small addition on the right of this late-19th century commercial structure is clearly secondary and compatible in size, materials and design with the historic building.



Figure 31. An elevator/stair tower was added at the back of this Richardsonian Romanesque-style theater when it was rehabilitated. Rough-cut stone and simple cut-out openings ensure that the addition is compatible and subordinate to the historic building. Photo: Chuck Liddy, AIA.

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This publication has been prepared pursuant to the National Historic Preservation Act of 1966, as amended, which directs the Secretary of the Interior to develop and make available information concerning historic properties. The Technical Preservation Services Branch, National Park Service, prepares standards, guidelines and other educational materials on responsible historic preservation treatments for a broad public audience. Additional information about the programs of Technical Preservation Services is available on the website at www.nps.gov/history/hps/tps.. Comments about this publication should be addressed to: Charles E. Fisher, Technical Preservation Publications Program Manager, Technical Preservation Services-2255, National Park Service, 1849 C Street, NW, Washington, DC 20240. This publication is not copyrighted and can be reproduced without penalty. Normal procedures for credit to the author and the National Park Service are appreciated.