

SUBDIVISION COMMITTEE MEETING NOTICE AND AGENDA

**Tuesday, September 15, 2026
8:30 a.m. or shortly thereafter
Līhu'e Civic Center, Moikeha Building
Meeting Room 2A-2B
4444 Rice Street, Līhu'e, Kaua'i, Hawai'i**

RECEIVED

26 SEP -4 P1:57

OFFICE OF
THE COUNTY CLERK
COUNTY OF KAUAI

A. CALL TO ORDER

B. ROLL CALL

C. APPROVAL OF AGENDA

D. MINUTES of the meeting(s) of the Subdivision Committee

1. July 14, 2026

E. RECEIPT OF ITEMS FOR THE RECORD

F. UNFINISHED BUSINESS

1. Preliminary Subdivision Map Approval

- a. Subdivision Application No. S-2027-1

Grove Farm Company, Inc. / State of Hawai'i – Agribusiness Development Corporation

Proposed 2-Lot Consolidation and Re-Subdivision into 3-Lots

TMKs: (4) 3-8-018: 001 and 009

Hanamā'ulu, Līhu'e, Kaua'i

1. Subdivision Report pertaining to this matter.
 2. Supplement #1 to Subdivision Report.
 3. Transmittal of agency comments to Planning Commission.
 4. Transmittal of public testimony to Planning Commission.

G. NEW BUSINESS (For Action)

H. EXECUTIVE SESSION

Pursuant to Hawaii 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. Subdivision Application No. S-2027-1

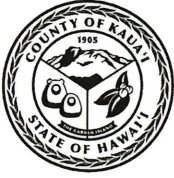
Grove Farm Company, Inc. / State of Hawai'i – Agribusiness Development Corporation

Proposed 2-Lot Consolidation and Re-Subdivision into 3-Lots

TMKs: (4) 3-8-018: 001 and 009

Hanamā'ulu, Līhu'e, Kaua'i

I. ADJOURNMENT



PLANNING COMMISSION

KAAINA S. HULL, CLERK OF COMMISSION

GLEND A NOGAMI STREUFERT, CHAIR
HELEN COX, VICE CHAIR
DAN GIOVANNI, MEMBER

RECEIVED

- The Planning Commission Meeting will be at:

26 SEP -4 P1:57

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

OFFICE OF
THE COUNTY CLERK
COUNTY OF KAUAI

- Oral testimony will be taken on specific agenda items, at the public meeting location indicated on the meeting agenda.
- 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 473, 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 Planning Commission's website prior to the meeting (<https://www.kauai.gov/Government/Boards-and-Commissions/Planning-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.

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 PLANNING COMMISSION
SUBDIVISION COMMITTEE MEETING
July 14, 2026
DRAFT

The regular meeting of the Planning Subdivision Committee of the County of Kaua'i was called to order by Subdivision Committee Chair Glenda Nogami Streufert at 8:32 a.m. -
Webcast Link: <https://www.kauai.gov/Webcast-Meetings>

The following Commissioners were present:

Ms. Helen Cox
Mr. Dan Giovanni
Ms. Glenda Nogami Streufert

Excused or Absent

The following staff members were present: Planning Department - Director Ka'aina Hull, Planning Department, Staff Planner Kenny Estes, Planning Secretary Shanlee Jimenez, Staff Services Supervisor Leila Kim; Office of the County Attorney – Deputy County Attorney Laura Barzilai, Office of Boards and Commissions – Support Clerk Lisa Oyama.

Discussion of the meeting, in effect, ensued:

CALL TO ORDER

Subdivision Committee Chair Glenda Nogami Streufert: The Subdivision meeting is called to order.

ROLL CALL

Planning Director Ka'aina Hull: Morning, Madam Chair. The first order of business is roll call. Commissioner Cox?

Commissioner Helen Cox: Here.

Mr. Hull: Commissioner Giovanni?

Commissioner Dan Giovanni: Here.

Mr. Hull: Chair Streufert?

Chair Streufert: Here.

Mr. Hull: You have a quorum, Madam Chair. 3:0.

APPROVAL OF AGENDA

Mr. Hull: Next, would be the Approval of the Agenda. The department doesn't have any recommended changes to the agenda.

Chair Streufert: Could I have a motion to approve the agenda as written?

Ms. Cox: I approve the agenda as written. I move that we approve the agenda as written.

Mr. Giovanni: I second the motion.

Chair Streufert: It's been moved and seconded. Is there any discussion? If not, could I have a voice vote? All those in favor of approving the agenda. Aye (unanimous voice vote. Okay, approved. 3:0.

MINUTES of the meeting(s) of the Subdivision Committee (None)

RECEIPT OF ITEMS FOR THE RECORD (None)

UNFINISHED BUSINESS (None)

Mr. Hull: Moving on down to Item G, New Business for Action, G.1.

NEW BUSINESS (For Action)

Preliminary Subdivision Map Approval

Subdivision Application No. S-2026-10

Princeville Meadows Subdivision

PRW Princeville Development Company, LLC.

Proposed 65-Lot Subdivision

TMK: (4) 5-3-013: 044

Hanalei, Kaua'i

- 1) Subdivision Report pertaining to this matter.

Mr. Hull: I don't have any members of the public signed up to testify on this agenda item, aside from the applicant. Is there any member of the public that would like to testify on this item? Seeing none, I'll turn it over to Kenny for the report.

Staff Planner Kenny Estes: Good morning, Madam Chair, and members of the Subdivision Committee. I'll summarize the report for the record.

Mr. Estes read the Summary, Project Data, Project Description and Use, Additional Findings, Preliminary Evaluation, and Preliminary Conclusion sections of the Director's Report for the record (on file with the Planning Department).

Chair Streufert: Is there any questions? Are there any questions for the Planning Department? Is the applicant here?

Mr. Max Graham: Good morning. Planning Commission, Subdivision Committee members. I'm Max Graham. I represent the applicant in this matter. The applicant is PRW Princeville Development Company, LLC. I'll refer to them as Princeville and with me is Maren Arismendez-Herrera, and she is the surveyor/engineer, who's responsible for this project. And so, basically we have, first, we have no objection to the conditions contained in the report or the recommendations. This is a 61 residential lot subdivision. It will also have three drainage lots and one road lot. It's located on the Princeville Plateau, next to the east of the Greens Subdivision and in what is called the Eastern Plateau of Phase II. So, Princeville Phase II is the property from Ka Haku Road all the way to Anini Vista Subdivision. And this project, actually the lot was created as part of the Queens on, excuse me, The Greens on Queen Emma's Bluff Subdivision. So, that was a subdivision that was done back in, I think, 2005, and this was a remnant lot that was left over. And it contains 46.62 acres. It's in the R6 CZO zoning district, and it's in the VDA. It's the last resort type development on the east side of Phase II. At one time, Phase II was planned for a major development within, not only this area, but also what's called the Central Plateau, but that has been, that is no longer a plan. And instead, the Central Plateau has been developed into the North Shore Preserve AG subdivision. The applicant did prepare a Ka Pa'akai analysis done by Cultural Surveys Hawai'i, Dr. Hal Hammett. The finding, it was done in accordance with the protocols issued by the Planning Department, and just as a reminder, the purpose of the Ka Pa'akai is to identify and scope valued cultural, historical and natural resources and traditional and customary Native Hawaiian rights within a property to be developed. So, first thing you do is try to identify if there are any practices or resources. Then number two, there's an obligation to determine the extent to which the project will impact any such resources. And number three, then the planning, the state or county agency must determine the feasible action to reasonably protect such resources and practices. The Ka Pa'akai analysis that you've been presented with did not find any cultural, historic, natural resources or practices taking place on the property. The property is, for the last hundred years has been part of the Princeville Ranch, used for various purposes. Primarily, it was sugar cane for a while and then the last 50 years or so it's been cattle pasture. It's a level property. There's nothing on it, no obvious features. I handed out also this morning an Archeological Impact Assessment, that statement, Archeological Impact Statement that was done by Dr. Hammett at the time of the original Greens and Meadows subdivision, and there were no archeological features found on this property. There are no kuleana lots located anywhere near this area in Princeville. In fact, the closest kuleana lots are down on the Anini Beach corridor. And there are no practices that have been identified. Nobody stepped forward to indicate any practices actively taking place. No burials have ever been found, so I believe the applicant has fulfilled its obligation to show by a preponderance of evidence that there'll be no impact on the any possible resources or practices.

Chair Streufert: You said you submitted this morning.

Mr. Graham: Yes.

Chair Streufert: Some documentation. I don't think we have that.

Mr. Graham: Oh, sorry.

Chair Streufert: Oh, I'm sorry.

Mr. Graham: This was referenced in the Ka Pa'akai analysis, and I thought I would just give it, give you the whole report, so you can see if you want to read it. But again, if you look at the findings, they did not...the result of the survey was that there were no historic resources located on this particular lot.

Chair Streufert: And this was done on January 5th of this year. Is that correct? It just says January 5th. So, I'm assuming it's 2026.

Mr. Graham: No, that was done in 2005.

Chair Streufert: Does that differ from the one that was presented?

Mr. Graham: Excuse me, 2009, January 2009. So, that's an Archeological Impact Survey. So, when the original subdivision was approved, the survey was completed. The purpose was to identify historic properties.

Chair Streufert: Okay.

Mr. Graham: None were identified on either The Green's lots or the Meadows lot. The Ka Pa'akai analysis is different, that looks to not the historic resources but to the practices taking place, if any.

Chair Streufert: Would you like a couple of minutes to read this or...okay.

Mr. Giovanni: The Ka Pa'akai is February 2024.

Chair Streufert: Right. And then, do you need time to read this at all?

Mr. Giovanni: No.

Chair Streufert: Okay. All right. Are there any questions for the applicant?

Ms. Cox: Is this going to be a gated subdivision?

Mr. Graham: Oh, I guess the answer is yes, because there's a gate further on...yeah on Emmalani Drive that...

Unknown Woman: Yeah, you're right.

Mr. Graham: Right. So, I'm sorry. There's a gate on Emmalani Drive that leads to The Greens and then subsequently to this property. And so, that is presently gated. We can talk to the planning director about that.

Ms. Cox: Planning Director, do you have something to say about that?

Mr. Hull: Well...what's that?

Deputy County Attorney Laura Barzilai: Is it fenced?

Mr. Hull: Yeah, off the top of my head, I have, I was not aware that this area was gated. There are always issues and concerns when it comes to gating up county standard roads.

Ms. Barzilai: We'll have to look at future conditions.

Mr. Hull: Yeah.

Ms. Cox: I guess one of the questions I would have is, given that, I mean, we could add a condition here, saying that it can't be gated, but if it's gated earlier, how do we deal with that issue?

Ms. Barzilai: Is it fenced all the way around?

Mr. Graham: No.

Chair Streufert: Would you...

Ms. Barzilai: So, (inaudible).

Chair Streufert: Would you like to step up to the table?

Ms. Cox: And tell us who you are.

Chair Streufert: Please, because you're...I think you've got some of the answers.

Mr. Graham: I'm sorry, yeah. This is Chynna Stone, and she represents Princeville. So, yeah, there, there's a gate. So, you have the main entrance to Princeville, which is Ka Haku Road, to get to this property, you turn right onto Emmalani Drive. There is a gate at...before you get to The Green subdivision. Is that correct?

Ms. Chynna Stone: Yeah.

Mr. Graham: Yeah.

Ms. Cox: Yeah.

Ms. Stone: So...

Chair Streufert: Would you introduce yourself and then...

Ms. Stone: Oh, hi. Hi, everyone. I wasn't prepared to talk. I don't think I'm dressed appropriately. My name is Chynna Stone. I represent PRW Princeville Development Company or one of, one of the representatives. This community is a part of Princeville Phase III. We have stewarded it since 2005, when it was acquired out of a bankruptcy sale, and Greens and Meadows and the bluff adjacent were zoned for about 3500 units, as Max referenced earlier, and its original entitlements, there were two additional hotels and 3,000 residential units. That largest phase was down zoned in 2009 to be only 75 units, two of which are on a landfill site from Hurricane Iniki. So, it's actually only 73 units. We have another ten years on the environmental monitoring for that. So, it's 73 units, very large home sites, small footprints. It's a known, you know, great, great

example, I think of, of preserving open space. Greens and Meadows, which are closer to Princeville, like the fountain I'm talking, I don't actually know all the road names, but the fountain entrance, I think it's, Ka Haku, anyway...

Mr. Graham: It's Ka Haku.

Ms. Stone: ...you drive in through the fountain entrance and there's a roundabout around the fountain and to the right, it's always been gated, since as long as we've owned it, and that's The Green subdivision. The entrance is right off of that roundabout, it's gated, currently gated. Sold as a gated community. There's residents in there now, and then Meadows is right through there, like it kind of cuts through the golf course, and it's right now just a field with pretty tall grass. We went and saw it actually, and that's the next phase of the subdivision. We don't have active, like an active current plan. I'm just trying to process the subdivision, so I can plan it more efficiently, because I don't want to do a bunch of planning for homes if I don't know what my subdivision will look like. It just seems like a waste of money. So, we're going through with the subdivision process so I can start to conceptualize what will go there, what the market demands. But it's probably ten years out, I think I'm not answering the question. Sorry.

Chair Streufert: The question was about a gated community.

Ms. Stone: Yeah. Yes. So, the gate's always been there. The gate's always been there off Ka Haku, off that roundabout. And I, we have sold it as a gated community and we anticipated it being there, it's been there as long as we've owned it and prior. So, we can talk about that, Ka'aina, but you know, my understanding, I... disclaimer, I'm also an attorney, but my understanding is that that's, you know, a situation that will continue.

Mr. Graham: Could I make a suggestion, that I don't think we can really solve this issue right here, that you add a condition saying that we need to resolve the issue of access and any gates with the Planning Department.

Ms. Stone: Well, I think that we have, like Princeville as a master development, because what we did when we, when we acquired it in 2000 and actually, 2005, 2005, is there was a public access thing, a public access agreement in place already. We have public access pathways that we maintain. We originally, I think when we sold the hotel, they had their own public access plan that went with that. And that's the Westin trail down to the beach that they now are responsible for that, not us anymore, but we still have the trail that runs along the highway, and we have all that covered. But let's talk more, Ka'aina.

Chair Streufert: Any other questions on the draft conditions (inaudible)?

Ms. Barzilai: The issue of access shall be resolved under Kaua'i County Code. The issue of access will be resolved under Kaua'i County Code 9-2.9.

Ms. Stone: What was that? Sorry.

Ms. Barzilai: If we have your consent to the language, that'd be great.

Ms. Stone: I'm unfamiliar with the code. (Inaudible).

Mr. Graham: We're going to resolve it.

Ms. Stone: Okay. Yes. Thank you. Yeah. Sorry.

Chair Streufert: So, is there a condition that you would. Is there a condition that commissioner would like to consider on this?

Ms. Cox: Well, the condition that I wanted considered, just, I'm not sure makes any sense anymore because what I wanted and what the proposed subdivision, shall not be gated in a manner that prohibits the general public's pedestrian or vehicular access to a county standard roadway that services the subject subdivision. But it's already gated, so I don't, I'm not quite sure what to do about that.

Ms. Barzilai: It would have to be removed.

Chair Streufert: Which one? The gate?

Ms. Barzilai: The gate.

Chair Streufert: The gate would have to be removed.

Ms. Cox: Yeah. You're right, it would have to be removed. But that seems like...

Ms. Stone: But we're...

Ms. Cox: ...that's a bigger, there's...so, they've advertised it as a gated community and people live in there.

Ms. Stone: We've also. We also have a public access plan in place already.

Ms. Cox: Into that area?

Ms. Stone: Into the, into the private subdivision? No.

Ms. Cox: Yes, into the private subdivision.

Ms. Stone: No, it's, it's...

Ms. Cox: Because it's on a county road. It's not on a county road. It's on a private road.

Ms. Barzilai: It's on a road that's not dedicated.

Mr. Hull: Correct. So yes, the (inaudible), is that, you know, Princeville, I think as Ms. Stone is stating to, is followed a paradigm and a development pattern that has, was previously approved without any restrictions on gating. The other side of that is that over time, we've seen what that's come to in other neighborhoods, and there has been considerable pushback from community members within specific neighborhoods, and I don't know why about this notion of having subdivisions done with county standard roadways that restrict general access on these roads. And to the developer's point, those are private roads, and they maintain them. So, I'm kind of at a

issue because I definitely hear Commissioner Cox and this has come up before, about this notion of further allowing gated communities on Kaua'i with new subdivision applications. This one's being proposed within an existing paradigm that already has gates, that was previously permitted. So yeah, I know there's a rub going on right now, and I'm not quite sure how we might be able to resolve that today.

Ms. Barzilai: How about the language that I suggested, the issue of public access under the code at 9-2.9 will be resolved before final approval.

Mr. Hull: That's one, one approach, is just, you know, we'll...if that language is say, inserted and the applicant consents to it, that's a tentative condition, it's a tentative approval condition. And then, you know, myself and Kenny can speak further with the applicant as we come to final, knowing that, you know, this is still going to be at least a commissioner, if not a whole commission's issue when it comes up for final and having that resolved in some manner adequately.

Chair Streufert: Is there another possibility of deferring?

Mr. Hull: That's completely within the commission's purview.

Ms. Cox: What was your, Glenda?

Chair Streufert: Would it be possible to defer this...

Ms. Cox: Oh.

Chair Streufert: ...until it is resolved?

Ms. Barzilai: How are we on timeline, right now?

Chair Streufert: I'm sorry.

Ms. Barzilai: We are restricted under a timeline. So, we need to hear from the applicant.

Mr. Graham: I think it would be more helpful if we could get the tentative approval, and then we have the basic structure for the subdivision. And then we'll resolve this matter one way or another we can't get final unless we do resolve it. So...

Chair Streufert: To clarify, this is a preliminary approval...

Ms. Cox: Right, right.

Mr. Giovanni: Right.

Mr. Giovanni: Can you state that condition a little bit louder, so I'm sure I understand.

Ms. Barzilai: I mean, if the planning, if the clerk agrees, I would suggest, and it sounds like the applicant consents that the issue of public access under the County Code at Section 9-2.9, will be resolved between the parties prior to final approval.

Mr. Graham: That's acceptable. Yes.

Ms. Barzilai: Okay.

Mr. Giovanni: So, I move to include that condition in the...what are we doing? A temporary or a...

Ms. Barzilai: Commissioner wants this condition added for preliminary approval.

Chair Streufert: So, we'll put that in right now as a suggestion. But are there any other questions that we have (inaudible)? Well, I have one, I guess. And that is the workforce housing issue. There is an issue that was brought up that this does trigger the workforce housing.

Mr. Graham: Yes, yes. So, we will need to meet with the housing agency and resolve that.

Chair Streufert: So, that would be a second condition then, that before...

Ms. Barzilai: I believe it's addressed.

Chair Streufert: Sorry.

Ms. Cox: It's already in there, isn't it?

Ms. Barzilai: I believe it's addressed, Chair. I think Condition 4 covers it, unless you want to expand on that. It basically inserts the housing director's comments.

Chair Streufert: Yeah, that's in there, but does it...that's the requirement of the housing department.

Ms. Barzilai: Yes. So, in the last paragraph, the preliminary is conditioned...

Chair Streufert: On resolution (inaudible)...

Ms. Barzilai: ...on resolution of workforce housing requirements.

Chair Streufert: So, that takes it (inaudible).

Ms. Barzilai: I believe that covers it.

Chair Streufert: All right. Is that also acceptable?

Mr. Graham: Yes.

Ms. Stone: Yes.

Chair Streufert: Are there any other questions that you would like to have resolved? So, there's, this 65 units or these 65 lots. Is that that's part of the proposed 173, is that correct?

Mr. Graham: If you, if you compute the, based on the zoning and the number of lots, if you do the numbers, it comes out to a maximum of 173 dwelling units would be allowed there.

Chair Streufert: There are no other questions? Can we have the recommendations?

Mr. Estes: The department is recommending Preliminary Subdivision Map Approval, as amended.

Chair Streufert: As amended. Are there, is here any discussion before that? Can we have a motion?

Ms. Cox: I have a comment and then I will make a motion. The comment is just that I appreciate the fact that more recently, we are making sure that more and more of our island does not get cut off from regular local residents by gated communities. So, I'm very troubled by this, but I understand that that was a precedent earlier. And I think we've...that condition, and so, I would like to move that we approve the tentative preliminary consideration of subdivision application with the additional comment or the condition we just added for S-2026-10.

Mr. Estes: Excuse me, Madam Chair, I'd also like to include for Conditions 11 and 12 of tentative approval.

Chair Streufert: Correct.

Ms. Cox: Oh, the shall.

Mr. Estes: Should. Replacing should with shall.

Ms. Cox: Yes, yes.

Chair Streufert: Could you amend yours?

Ms. Cox: Yes. Yes. And to include the shall.

Mr. Giovanni: So, I second the motion. And I concur with the concern and comments of Commissioner Cox.

Chair Streufert: It's been moved and seconded that we approve the Preliminary Subdivision application, as amended. Is there any discussion before we take a vote? I think you've heard that we have a lot of concerns about gated communities and what the impact is upon our local population and their access to different areas of the island. And so, I know that the department will take that into account when you discuss that with them. So, all those in favor...could we have a roll call vote on this?

Mr. Hull: Roll call, Madam Chair. Commissioner Cox?

Ms. Cox: Aye.

Mr. Hull: Commissioner Giovanni?

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 3:0.

Mr. Graham: Thank you very much.

Ms. Stone: Thank you.

Chair Streufert: Thank you.

Preliminary Subdivision Extension Request

Mr. Hull: Next, we have G.2.

Subdivision Application No. S-2021-5
Lot 19 of Kukui'ula Parcel H Subdivision
Kukui'ula Vistas, LLC.
Proposed 8-Lot Subdivision
TMK: (4) 2-6-022: 055
Koloa, Kaua'i

- 1) Subdivision Report pertaining to this matter

Mr. Hull: We don't have any members of the public signed up to testify. Is there any member of the public that would like to testify on this agenda item? Seeing none, I'll turn it back over to Kenny.

Mr. Estes read the Summary, Project Data, Project Description and Use, Additional Findings, Preliminary Evaluation, and Preliminary Conclusion sections of the Director's Report for the record (on file with the Planning Department).

Chair Streufert: Are there any questions for the department? If not, could we have the applicant?

Ms. Maren Arismendez: Good morning, Planning Commission. Maren Arismendez of Esaki Surveying, here on behalf of the applicant, we would like to respectfully request approval of the extension. There's been continuous work on progress in getting conditions resolved. We just require additional time to complete the requirements.

Chair Streufert: So, this will be extended for a year.

Ms. Arismendez: One.

Chair Streufert: So, at this point this would be extended for a year to April 11th, 2027.

Ms. Arismendez: Correct.

Chair Streufert: Are there any questions for the applicant ,for the representative?

Ms. Cox: It's actually not a year. And so, I'm just, is that going to give you sufficient time?

Ms. Arismendez: We'll try our best.

Chair Streufert: It's a year from the original.

Ms. Cox: Original, yes.

Ms. Arismendez: And it's a back and forth with agencies. So, we try our best, but then also sometimes we just got to wait for them to respond, but we're hopeful.

Ms. Cox: Thank you.

Chair Streufert: Any other questions? Do we have a recommendation from the department?

Mr. Estes: The department is recommending an extension until April 11th, 2027.

Ms. Cox: I move we approve S-2021-5, the extension to April 11th, 2027.

Mr. Giovanni: I second the motion.

Chair Streufert: It's been moved and seconded. Is there any discussion? If not, could we have a roll call vote on this, please?

Mr. Hull: Roll call, Madam Chair. Commissioner Cox?

Ms. Cox: Aye.

Mr. Hull: Commissioner Giovanni?

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 3:0.

Ms. Arismendez: Thank you.

Mr. Hull: Next, we have another subdivision extension request.

Subdivision Application No. S-2022-2
Lot 18 of Kukui'ula Parcel H Subdivision
Kukui'ula Vistas, LLC.
Proposed 7-Lot Subdivision
TMK: (4) 2-6-022: 054

Koloa, Kaua'i

- 1) Subdivision Report pertaining to this matter.

Mr. Hull: Are there any members of the public that would like to testify on this agenda item? Seeing none, turn it back over to Kenny.

Mr. Estes read the Summary, Project Data, Project Description and Use, Additional Findings, Preliminary Evaluation, and Preliminary Conclusion sections of the Director's Report for the record (on file with the Planning Department).

Chair Streufert: Are there any questions of the department? Would the applicant...

Ms. Arismendez: Good morning. Maren Arismendez of Esaki Surveying here on behalf of the applicant. Requesting approval of the extension request. We are currently routing the construction plans for final signature. That's just a process that takes its time. The way the current routing works is, it goes agency to agencies, not all agencies at a time. So, it's a slow process. Sometimes there's comments during the final signature where it restarts the routing process. So, we just require more time to complete it.

Chair Streufert: Are there any questions of the applicant? If not, could we have a recommendation?

Mr. Estes: It is recommended that an extension until April 11th, 2027 be granted (inaudible) final approval.

Ms. Cox: I move we approve the extension request of S-2022-2, to April 11th, 2027.

Mr. Giovanni: I second.

Chair Streufert: It's been moved and seconded. I think we'll just go with a voice vote on this one. All those in favor? Aye (unanimous voice vote). All those opposed? Okay, it's been approved.

Ms. Arismendez: Thank you.

Mr. Hull: Motion passes, Madam Chair. 3:0. And last on the agenda, G.2.c.

Subdivision Application No. S-2022-8
Kukui'ula Parcel X Subdivision
BBCP Kukui'ula Parcel X, LLC. Et Al.
Proposed 2-Lot Consolidation and Re-subdivision into 4-Lots
TMKs: (4) 2-6-015: 010 and 011
Koloa (Makai), Koloa, Kaua'i

- 1) Subdivision Report pertaining to this matter.

Mr. Hull: Are there any members of the public that would like to testify on this agenda item? Seeing none, I'll turn it back over to Kenny.

Mr. Estes read the Summary, Project Data, Project Description and Use, Additional Findings, Preliminary Evaluation, and Preliminary Conclusion sections of the Director's Report for the record (on file with the Planning Department).

Chair Streufert: Are there any questions for the department? If not, could we have the applicant.

Mr. Mauna Kea Trask: Aloha, Mauna Kea Trask for the applicant, BBCP Kukui'ula Parcel X LLC.

Chair Streufert: Is there anything you would like to say about this extension?

Mr. Trask: No, I think Kenny did an excellent job, but I'm just like to say, I think that I know the commission always likes to see these things proceed. You know, there's a concern about delay or taking time. And I just want to assure you, speaking with my client, representative Chris Rivera is here on behalf of the applicant. And just to assure you guys, I'm sure you can guess, no one wants to move faster than my client. We would love to have this complete. But these things take time. You know, there's reviewing agencies, addressing concerns, also the Ka Pa'akai analysis, as you know, is an important consideration. The Planning Department has made it its policy that that these things, you know, are completed in a myriad of projects and that creates a necessity for more time for these consultants to do those jobs. So, in trying to best articulate it, I looked at the 'Ōlelo No'eau and I saw two, but I like one better. This is 'Ōlelo No'eau 1870, Ku'ia ka hele a ka na'au ha'aha'a, hesitant walks the humble hearted. A humble person walks carefully, so he will not hurt those about him. As you know, Kukui'ula has been the object of some concern, given the history and culture and the resources located thereon. So, we're just asking for another extension in order to address those concerns and take the time to do it right. And that's all, unless you have questions.

Chair Streufert: Are there any questions for the applicant?

Mr. Giovanni: Yeah. Is this enough time to resolve all these issues or are you going to come back again and again.

Mr. Trask: Likely not. I mean, if you look at our letter that was submitted January 20th, 26 of this year, they indicated about three years. As you know, it, and this is just an acknowledgment of what happened. It took, because of the heavy workload of your department, it took them over five months to just get it on the agenda. So, we'll likely be back shortly, if there is discretion to grant longer than a year, we'd be happily take it. But it's a function of the subdivision ordinance, I believe.

Mr. Hull: Yeah, it's a...

Mr. Giovanni: We don't have (inaudible)?

Mr. Hull: No. And that's something we've been discussing with Kenny. You know, there was that move at the state leg a couple of years ago to try to make these a little bit more efficient. Of course, it ended up piling on even more requirements than we already have. But this, this, this...and that's why every agenda, almost every agenda has all these extension requests, because it has this one-year timeline. And in 1972, yeah, getting through the agency requirements and the

various legal reviews took about a year. It certainly does not take that, the vast majority of subdivisions cannot be completed within the one-year time frame that was set up in 1972. So, going back to council and, you know, even asking whether for a longer time frame or giving the commission discretion to extend it on a project basis, that's something we were looking at initiating on our end to get to county council.

Mr. Giovanni: So, the, yeah, if we keep it within the county, then we can go ask for project-by-project discretion to, that's a proposal that the County Council can approve.

Mr. Hull: Correct. As to give this body that authority.

Mr. Giovanni: Yeah. I would encourage the department to move in that direction, because these things are not efficient.

Mr. Hull: No.

Mr. Giovanni: You know. It's costly, you know, for us and our time. But for the developer as well, you know, it's not fair.

Mr. Hull: Yep.

Mr. Giovanni: That being said, I'll defer to Commissioner Cox for a motion.

Ms. Cox: All right. I guess I'm the official motion maker this morning. Okay. I will make a motion that we approve the extension request of S-2022-8 until March 22nd, 2027.

Chair Streufert: Is there a second?

Mr. Giovanni: As the official second motion maker, I second the motion.

Chair Streufert: If there are no discussions. All those in favor? Aye (unanimous voice vote). All those opposed? Motion carries. 3:0.

Mr. Trask: Mahalo nui.

EXECUTIVE SESSION (None)

ADJOURNMENT

Mr. Hull: That concludes the Subdivision Committee agenda. Ready for adjournment and we can reconvene the Planning Commission in 5 or 10 minutes.

Chair Streufert: Can I have a motion to adjourn, please?

Ms. Cox: I move we adjourn.

Mr. Giovanni: Second.

Chair Streufert: All those in favor? Aye (unanimous voice vote). All those opposed? 3:0. Meeting adjourned.

Chair Streufert adjourned the meeting at 9:14 a.m.

Respectfully submitted by:

_____*Lisa Oyama*_____

Lisa Oyama,
Commission Support Clerk

() Approved as circulated (date of meeting approved).

() Approved as amended. See minutes of _____ meeting.

DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR

JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

SUBDIVISION REPORT

I. SUMMARY

Action Required by Planning Commission: Consideration of Subdivision Application No. S-2027-1 involving a two-lot Consolidation and Re-Subdivision into three lots.

Subdivision Permit No. Application No. S-2027-1

Name of Applicant(s) GROVE FARM COMPANY, INC. /
STATE OF HAWAI'I, AGRIBUSINESS DEVELOPMENT CORPORATION

II. PROJECT INFORMATION

Map Title	Consolidation of Lot 1-A-10 of Island School Expansion dated June 28, 2008, Being all of Grant 8027 to Līhu'e Plantation Co., LTD and Lot 1-A-5-B-1-A of Final Map dated December 17, 2025 Being a Portion of Royal Patent 4481, Land Commission Award 7713, Apana 2, Part 7 to V. Kamamalu and Resubdivision into Lots 1 to 3, Inclusive and Designation of Easements AU-100 and AU-101 at Hanamī'ulu, Līhu'e, Kaua'i, Hawai'i.				
Tax Map Key(s):	3-8-018: 001, 009	Area:	6,029.03 Acres		
Zoning:	Agriculture (Ag) / Open (O) / General Industrial (I-G) / Neighborhood Commercial (C-N)				
State Land Use District(s):	Agricultural / Urban	General Plan Designation:	Agricultural / Natural / Neighborhood Center / Residential Community		
AGENCY COMMENTS					
☒ COK Public Works		pending	☒ State DOT-Highways:		pending
☒ COK Water:		pending	☒ State Health:		pending
☐ COK Housing:			☐ DLNR – SHPD:		
☐ COK Fire:					
EXISTING ROAD RIGHT-OF-WAY(S)					
Road Name	Existing Width	Required Width	Pavement YES	NO	Reserve
Ma'alo Road	60 feet	60 feet	☒	☐	
Kūhio Highway	80 feet	80 feet	☒	☐	
APPLICABLE FEES					
Environmental Impact Assessment (EIA)	N/A				
Park Dedication	N/A				
Appraisal Report Required	N/A				

SEP 08 2026

E.I.C.I.
F.I.A.I.
AUG 11 2026

Date of Preliminary Map Acceptance:	July 13, 2026
Date of Director's Report:	July 30, 2026
Date of Public Hearing:	August 11, 2026
Deadline Date for PC to Take Action Pursuant to Section 9-3.4(b) of the K.C.C.:	September 26, 2026

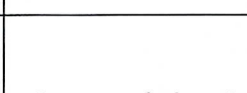
III. EVALUATION

Project Description

The proposal involves a two-lot consolidation and re-subdivision into three lots, comprising a total area of approximately 6,079.03 acres. As represented, the purpose of the subdivision is to convey proposed Lot 2, situated on the eastern side of Ma'alo Road and containing approximately 1,076 acres, to the State of Hawai'i, Agribusiness Development Corporation (ADC). Since the proposal is being requested by a government agency, the subdivision is exempt from the "one-time" subdivision restriction involving Agriculture zoned lands, pursuant to Section 8-8.3(c) of the Comprehensive Zoning Ordinance.

This subdivision is intended for mapping purposes only. There will be no development associated with this subdivision application.

IV. RECOMMENDATION

TENTATIVE APPROVAL	FINAL APPROVAL
☒ Approval ☐ Denied	☐ Approval ☐ Denied
Tentative Approval subject to all requirements as noted on the following pages:	All conditions have been complied with
 Director of Planning	 Director of Planning
 Date	Date

V. AGENCY REQUIREMENTS

1. Requirements of the County Planning Department:
 - a. An updated preliminary title report for the existing lot shall be submitted to the Planning Department for review.
 - b. All existing and proposed easements, if any, shall be identified in the deed descriptions of the affected lots, draft copies of which shall be submitted to the Planning Department for review and approval.

- c. Pursuant to Section 9-3.8(b) of the Subdivision Ordinance, Kaua'i County Code (1987), the Applicant shall submit to the Planning Department an electronic record (digitized format) of the final subdivision map(s) on disk for record keeping purposes prior to final subdivision approval.
 - d. Pursuant to Section 9-3.8(c) of the Subdivision Ordinance, Kaua'i County Code, 1987, as amended, the Applicant shall file fifteen (15) copies of the subdivision final map with the Planning Department within one (1) year after approval of the preliminary subdivision map. If no filing is made, the approval of the preliminary subdivision map and construction plan shall become void unless an extension of time is granted by the Planning Commission.
 - e. Prior to final subdivision approval, the Applicant shall revise the boundaries of proposed Lot 3 so that no density will be created from amount of land area that is situated within the County's Agriculture (Ag) zoning district. The Applicant shall work with the Planning Department in resolving this matter.
 - f. The applicant is advised that since the proposal is being requested by a government agency, the subject subdivision application shall be exempt from the "one-time" agriculture subdivision restriction, pursuant to Section 8-8.3(c) of the Comprehensive Zoning Ordinance, Kaua'i County Code (1987), as amended.
2. Requirements of the County Department of Public Works (DPW):
- a. The subdivider shall comply with the requirements of the Department of Public Works, if any, prior to final subdivision approval. The subdivider shall be notified of such requirements upon receipt of their report.
3. Requirements of the County Department of Water (DOW):
- a. The subdivider shall comply with the requirements of the Department of Water, if any, prior to final subdivision approval. The subdivider shall be notified of such requirement upon receipt of their report.
4. Requirements of the State Department of Health (DOH):
- a. The subdivider shall comply with the requirements of the Department of Health, if any, prior to final subdivision approval. The subdivider shall be notified of such requirements upon receipt of their report.
5. Requirements of the State Department of Transportation (DOT):
- a. The subdivider shall comply with the requirements of the Department of Transportation, if any, prior to final subdivision approval. The subdivider shall be notified of such requirements upon receipt of their report.

6. The Applicant is advised that should any archaeological or historical resources be discovered during ground disturbing/construction work, all work in the area of the archaeological/historical findings shall immediately cease and the applicant shall contact the State Department of Land and Natural Resources, Historic Preservation Division to determine mitigation measures.
7. The Applicant is advised that prior to and/or during construction and use additional conditions may be imposed by government agencies. Should this occur, the applicant shall resolve these conditions with the respective agency(ies).

The Planning Commission is further advised that this report does not represent the Planning Department's final recommendation in view of the forthcoming public hearing process scheduled for AUGUST 11, 2026, whereby the entire record should be considered prior to decision-making. The entire record should include but not be limited to:

- a. Pending government agency comments;
- b. Testimony from the general public and interested others; and
- c. The Applicant's response to staff's report and recommendation as provided herein.

By 
KENNETH A. ESTES
Planner

Table 1. Mean age, sex, and weight of the subjects.

LOCATION MAP 1
Subdivision Application No. S-2027-1
Grove Farm Company, Inc. /
State of Hawaii - ADC

Subject Property
Remain with Grove Farm Company, Inc.

Subject Property
Convey to ADC

LOCATION MAP 2

MAALO

LAUKONA

PAKA

WAIKUA

HOOHANA

WAIAHI

HIPA

HEHI

KAUAI BEACH

MARINE CAMP

LEHO

NAU

KUHILO

AHUKINI BAY

KAPULE

KINIPOPO

AFUKINI

EONO

ULUHUI

Wilcox Hospital

Remain with Grove Farm Company, Inc.

Convey to ADC



KAUAI BEACH

KAUAI BEACH

P 2

Ahukini Bay

Wilcox Hospital

LOCATION MAP 2
Subdivision Application No. S-2027-1
Grove Farm Company, Inc. /
State of Hawaii - ADC

Subject Property

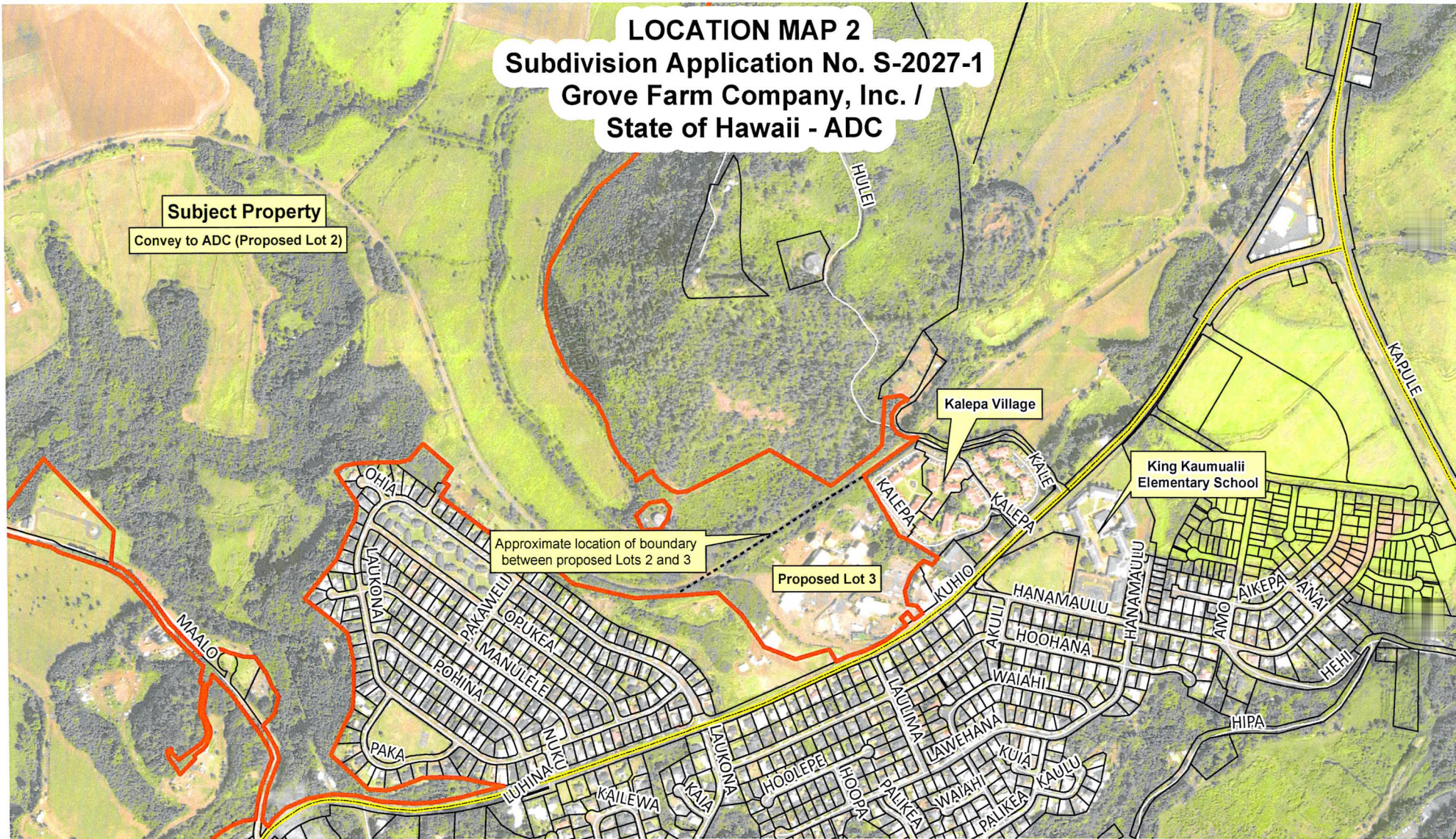
Convey to ADC (Proposed Lot 2)

Approximate location of boundary
between proposed Lots 2 and 3

Proposed Lot 3

Kalepa Village

King Kaumualii
Elementary School



DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR

JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

Supplement #1 to Subdivision Report

RE: Subdivision Application No. S-2027-1

APPLICANT: Grove Farm Company, Inc. / State of Hawai'i - Agribusiness Development Corporation

At its meeting held on August 11, 2026, the Subdivision Committee considered the subject subdivision application for Preliminary Subdivision Map Approval. During the meeting, a Ka Pa'akai Analysis prepared by Exploration Associates, Ltd., dated December 2025, was transmitted to the Subdivision Committee for its review and consideration. Due to the timing of the transmittal and the insufficient time for the Committee to review the Analysis, the Subdivision Committee voted to defer action on the application to its meeting scheduled for September 8, 2026. The deferral was intended to provide the Committee with adequate time to review and evaluate the Ka Pa'akai Analysis prior to taking action on the subject application for Preliminary Subdivision Map Approval.

As a result of the public testimony received on August 11, 2026, concerning the subject application, the Applicant submitted an updated Ka Pa'akai Analysis prepared by Exploration Associates, Ltd., dated August 2026, for the Subdivision Committee's review and consideration. Please refer to Exhibit 'A'.

Based on the information presented in the August 2026 Analysis, including the Applicant's consultation with kama'āina and community members and the historical information of the project area, the Department finds that the proposed development is not anticipated to impact any known Hawaiian traditional or customary practices for the following reasons:

- There are no known traditional or customary practices of native Hawaiians that are presently occurring within the Project area.
- There are no known special gathering practices taking place within any portion of the Project area.
- The Project will not detrimentally affect access to any streams; access to the shoreline or other adjacent shoreline areas; or gathering along any streams, the shoreline or in the ocean.
- There are no known religious practices taking place within the Project area.
- There are no known pre-contact cultural or historic sites or resources located within the Project area.
- There are no known burials within the Project area.

By



KA'ĀINA S. HULL
Director of Planning

Date:

9/1/2026

EXHIBIT 'A'

(Applicant's Updated Ka Pa'akai Analysis dated August 2026)



Ka Pa`akai Analysis

Native Hawaiian Traditions, Customary Practices and Perspectives of
Hanamā`ulu Ahupua`a Moku o Puna, Kaua`i Island
for
TMK (4) 3-8-018:001

Prepared for

Grove Farm Company Inc.

Prepared by
Exploration Associates Ltd.

December 2025

Updated August 2026

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Introduction

At the request of Casey Watabu of Grove Farm Company Inc. Hanamā'ulu, Exploration Associates (EAL) conducted a Ka Pa'akai analysis of 6072.968-acre parcel (TMK: (4) 3-8-018:001 which is in the Hanamā'ulu Ahupua'a, Puna District on Kaua'i Island (Figures 1 - 6). Hereinafter referred to as "*project area*". The project area is located within Hanamā'ulu, Ahupua'a. Grove Farm Co. original requested a 5-lot subdivision. The Planning Department asked for it to be changed into 3 lots. Interviews for this Analysis were told it was to be 5 lots but the location is still the same just the acreage on some of the proposed lots are larger. The project is for subdivision of parcel 001 into three lots. Figure 2 shows the proposed subdivision map indicating the 3 new lots. ADC is going to take over 1000 acres. The land is currently owned by the Grove Farm Company Inc., Hawaii Golden Trading LLC, Kauai Memorial Gardens Inc. and Maalo Farms LLC and is situated in the upland region of Hanamā'ulu, Kaua'i, about 1- 3 miles inland from the coast. The area includes the former sugar plantation lands. There are no development plans nor changes in use.

The project area is below the lower western slopes of Kālepa Ridge outside of the forest reserve. It includes parts of Maalo Road with an easement to the Department of Water. The area immediately surrounding the project area is rural and is primarily used for agricultural fields and pasture lands. The subdivision is not changing the uses of the land.

The County Planning Department requires all land permits address the proposed project's effects on traditional Hawaiian practices, customs, and beliefs. This Ka Pa'akai analysis provides information pertinent to the evaluation of the proposed project's cultural impacts.

Methodology

Methodologies guided by indigenous Hawaiian cultural perspectives and intellect were used to conduct this study. It is always imperative that traditional values of *aloha* and *hō'ihi* (sincerity, love, and respect) are ever present in the actions of the research and investigative team that engages with the natural environments, resources, people, and communities from which/whom information will be gathered for this work. Special focus and attention is given to the examination of the land, water and atmospheric features that are applicable to the study project area and all lands and environments associated with it.

At the onset of this project, EAL entered this work with much enthusiasm and confidence of already "knowing" this place. Even with a limited window of time to

conform to, EAL knew that only a little had been documented to bring forth the values and depth of traditional Hawaiian knowledge and customary practices of Hanamaulu's ancient past. Information and personal experiences that EAL possessed provided an advantage to accomplish the task of completing this Ka Pa'akai analysis.

Much of the effort in conducting studies such as this is to review and evaluate the land allocated for the project area and any possible adverse influences and consequences relating to indigenous Hawaiian beliefs and practices.

Scope of Work

- (1) The identity and scope of valued cultural, historical, or natural resources that are found within the proposed project area and relevant areas within the ahupua'a of Hanamā'ulu, including the extent to which traditional and customary Native Hawaiian rights are exercised.
- (2) The extent to which those resources, including traditional and customary Native Hawaiian rights, will be affected or impaired by the proposed action.
- (3) The feasible action, if any, to be taken by the agency to reasonably protect Native Hawaiian rights if they are found to exist. (Ka Pa'akai, 94 Haw. at 19, 7 P.3d at 1084.)

Environmental Setting

Alluvium, colluvium and terrigenous sediments resulting from the erosion of the primary island building events in Kaua'i history, the Waimea Canyon Volcanic Series and the Koloa Volcanic Series, are the major sources of sediment for the formation of Kaua'i's non-mountainous region (MacDonald and Abbott 1970:382-384). Hanamā'ulu is located within the physiographic division known as the Līhu'e Plain (Armstrong 1973:30). During higher sea levels, terrigenous sediment accumulated further inland as streams released their sediment loads further inland from where the shoreline had encroached. Also, reefs grew with the rising sea level, and, as the sea receded, marine sediments were created and deposited on shore by the erosion of these reefs. Both processes were part of the formation of the Līhu'e Plain. Topography includes slopes from Kalepa Ridge with upland silty clay soils developed from basaltic rock.

According to the U.S. Department of Agriculture Soil Conservation Service (SCS), soils in the project area consist of Lihue Silty clays (LhB). These soils are characterized by

moderately rapid permeability, slow runoff, and slight erosion hazard. Engineering interpretations for this soil type indicate no unusual conditions that would affect construction. However, shrink-swell potential is indicated as moderate.

There exist three soil suitability studies for Hawaii which describe the physical attributes of land and the relative productivity of different land types. These are: Soil Conservation Service Soil Survey, Detailed Land Classification, and Agricultural Lands of Importance to the State of Hawaii.

Soil Conservation Service (SCS) Soil Survey: SCS soil capability classifications are based on soil profile, topography, water holding capacity, drainage, erosion hazard, pH, workability, and depth of root penetration. The SCS soil capability classifications range from I to VIII, with I representing the best. Class I soils have no more than minimal limitations that restrict crop production. Class II soils have moderate limitations. Class III soils are marginal and Classes IV to VIII soils are unsuitable for crop production, with Class VIII having the most severe limitations.

The SCS classifies the Lihue silty clay in Sugarcane Group 1, indicating that this soils type is in the grouping most suitable for sugarcane production. The soils capability group is Subclass IIe. This indicates the soils are subject to moderate erosion if they are cultivated and not protected. Soils are 30" to more than 60" deep and have slopes of 0% to 8%.

Detailed Land Classification: The Land Study Bureau (LSB) classifies soils by land type in which classifications are provided for an overall crop productivity rating, with and without irrigation, and for selected crop productivity ratings for seven crops. LSB overall ratings range from A to E, with A being the best. The detailed classification done by the Land Study Bureau for the island of Kauai in 1967 designates the project area as B4li; B indicating a productivity rating of B (second highest on scale); 41 indicating the soil type, Lihue silty clay; and i indicating it is irrigated.

According to the U.S. Department of Agriculture (USDA) soil survey (Foote et al. 1972), the project area consists of soils from the Hanalei Series (HnA, Hanalei silty clay, 0 to 2% slopes; HrB, Hanalei silty clay, deep water table, 0 to 6% slopes), Ioleau Series (IoB, Ioleau silty clay loam, 2 to 6% slopes; IoC, Ioleau silty clay loam, 6 to 12% slopes), Kapa'a Series (KkD, Kapaa silty clay, 15 to 25% slopes), Lihue Series (LhD, Lihue silty clay, 0 to 8% slopes; LhC, Lihue silty clay, 8 to 15% slopes; LhE2, Lihue silty clay, 25 to 40% slopes, eroded; LIB, Lihue gravelly silty clay, 0 to 8% slopes; LIC, Lihue gravelly silty clay, 8 to 15% slopes), Nonopahu Series (NnC, Nonopahu clay, 2 to 10% slopes), and Puhi Series (PnB, Puhi silty clay loam, 3 to 8% slopes; PnC, Puhi silty clay loam, 8 to 15% slopes; PnD, Puhi silty clay loam, 15 to 25% slopes).

Sugarcane has been the preferred crop for this location, and because of this, the soil

has been heavily worked mechanically through time. This re-occurring soil preparation, year upon year for sugarcane production, has resulted in mixed strata as well as the inclusion of non-native soils, such as sand and coral, being imported for soil health.

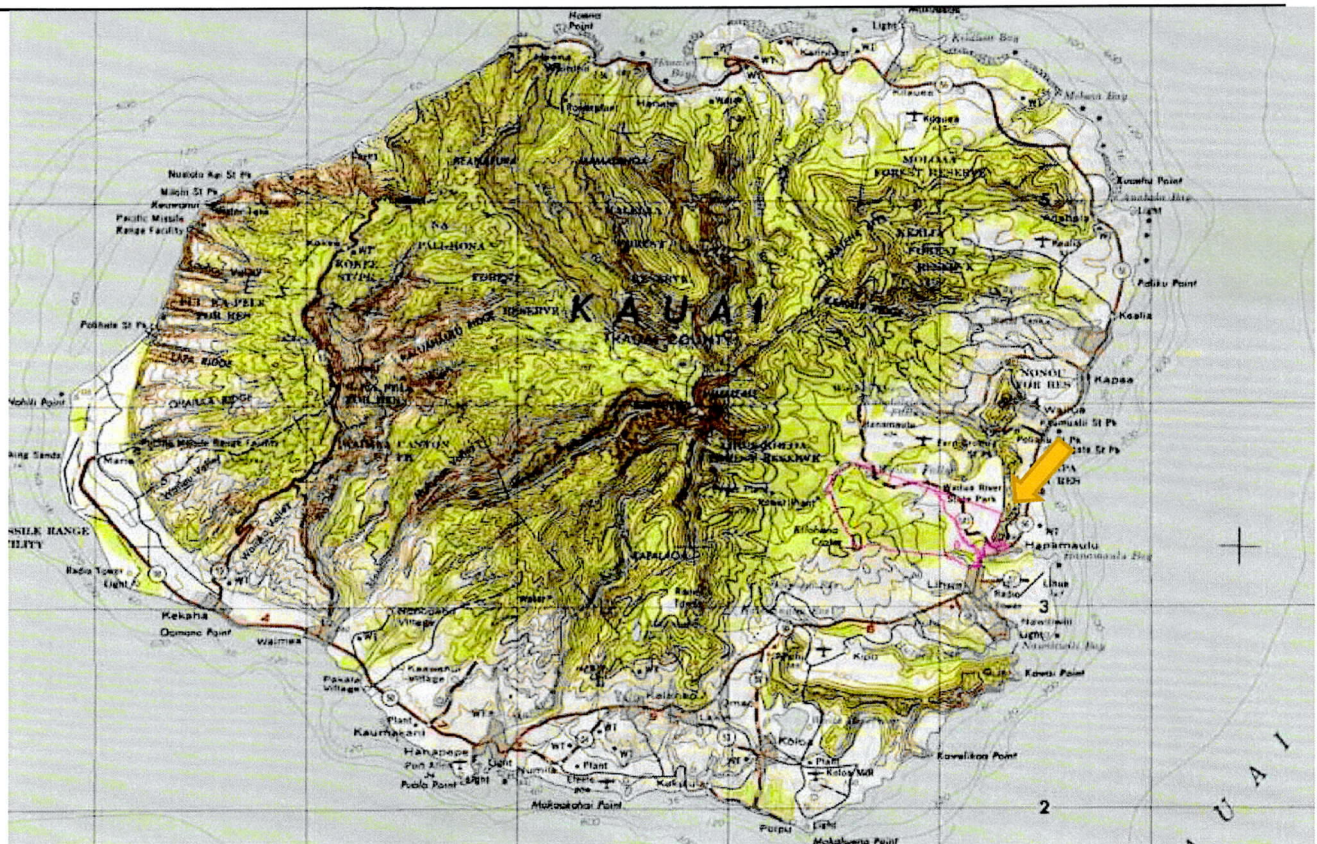
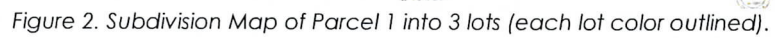
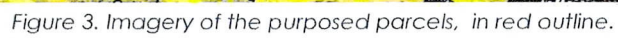


Figure 1. USGS Map of the Project Area in red outline.





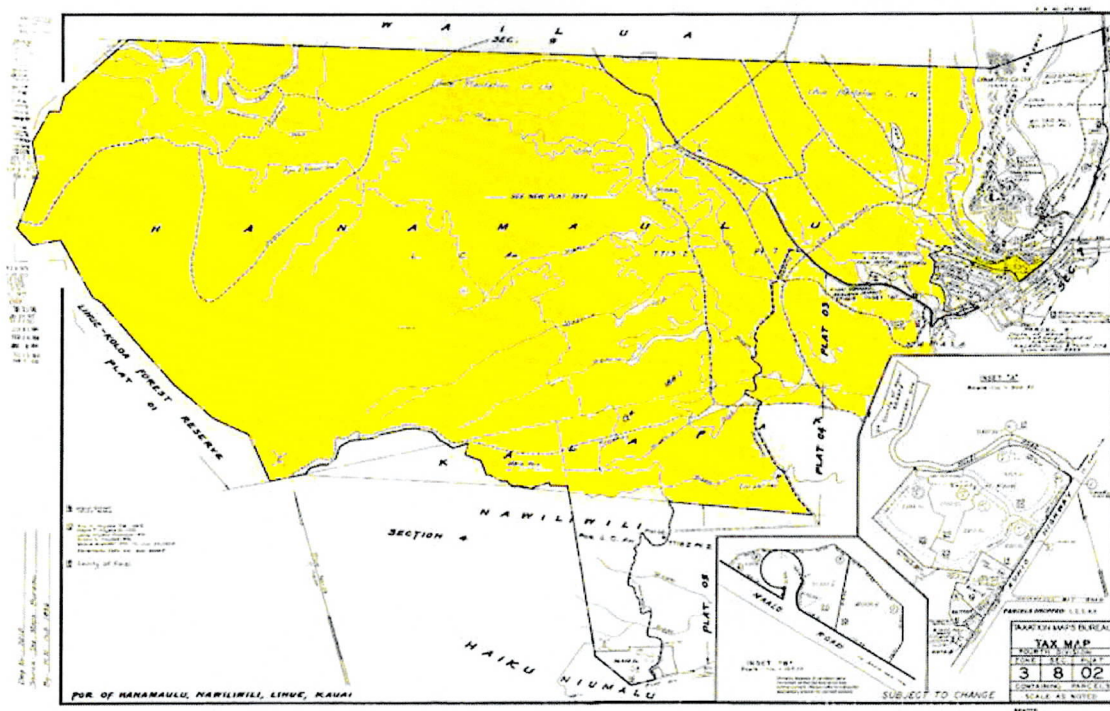


Figure 4. TMK: (4) 3-8-002:0001.

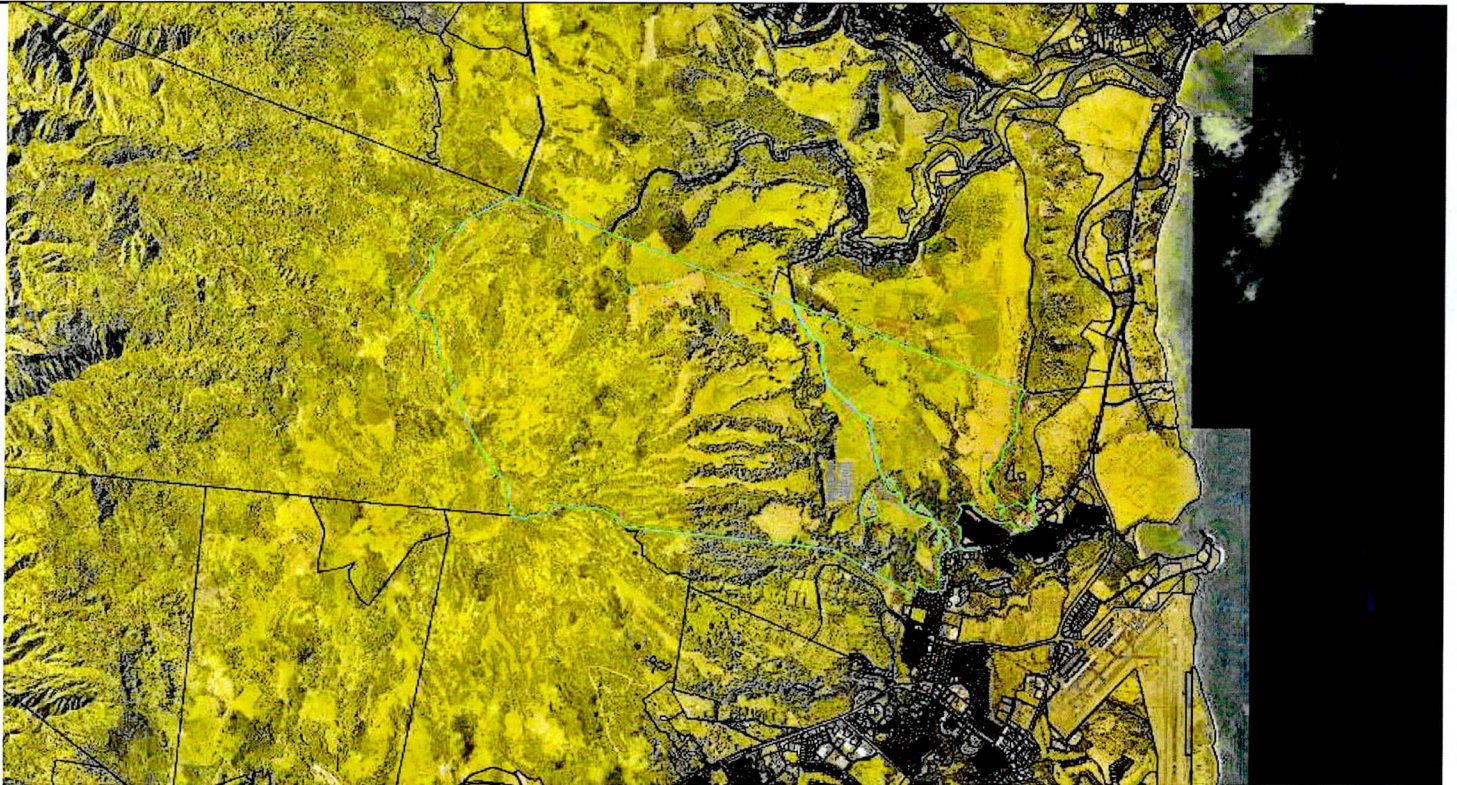


Figure 5. The aerial of the project area is outlined in blue. Source qpublic.net Kauai County.



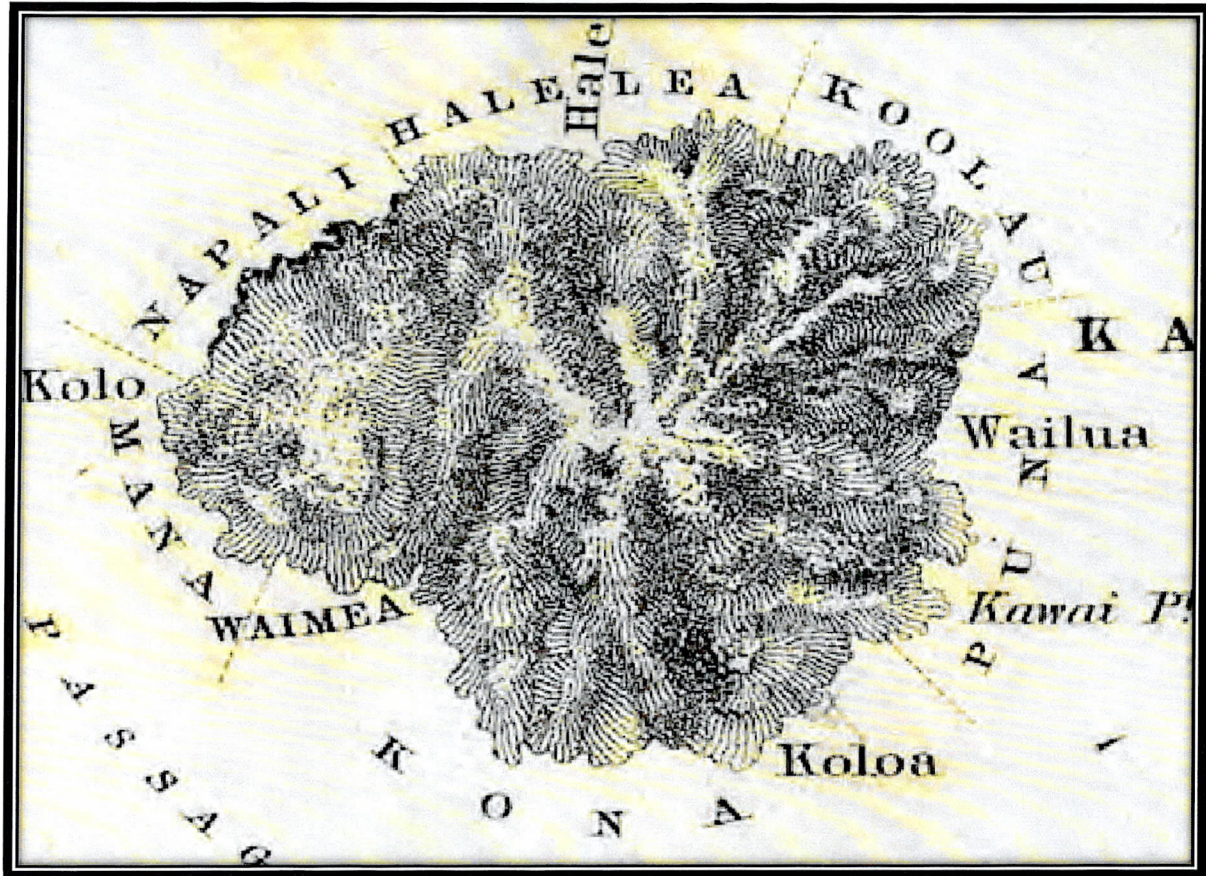


Figure 7. 1845 Map of Kaua'i by Charles Wilkes for U.S. Mapping Expedition. Note that it shows 6 moku or districts including Kō'olau, Halele'a, Nā Pali, Kona and Mānā. Typically, Kaua'i is divided into 5 moku. Mānā is usually considered as part of the Kona moku.

Geologically, Kaua'i is the oldest of the main inhabited islands in the chain. It is also the northwestern-most island, with O'ahu as its closest volcanic sibling separated by the tempestuous Ka'ie'ie Channel which is more than 72 miles long. In centuries past, Kaua'i's isolation from the other islands kept it safe from outside invasion and unwarranted conflict.

Cultural Overview

This project area is in the midland region of Hanamā'ulu, which has played a critical role in both historical and cultural development. Plantation activities and camp settlements shaped the cultural landscape, including sugar transportation infrastructure and communal agricultural practices in these inland zones.

Poetically, the island is called, "Manōkalanipō", or "Kaua`i a Manō" after the ancient chief who was largely responsible for elevating Kaua`i's ancient society to sophisticated heights of advancement and productivity. For centuries, from the time of Manōkalanipō's reign, through Kamehameha's unsuccessful attempts to invade Kaua`i in 1796 and 1804, Kaua`i remained free from warfare.

In 1810, Kaumuali`i accepted Kamehameha as the supreme ali`i by peacefully ceding Kaua`i to the newly United Kingdom of Hawai`i. With honor, Kaumuali`i was encouraged to return to rule on Kaua`i as its tributary chief under Kamehameha I.

In accordance with the ancient land division system, an entire island is referred to as a *mokupuni*. While the word, *moku* by itself can also mean island, it is a term that is more specifically used to identify a district. *Puni* means, *controlled, surrounded, to gain control of*. It comes from the word, *aupuni* which is used to describe a government, kingdom, dominion, nation, or population that is governed or under the leadership of a ruler. In ancient times, a *mokupuni* could include an entire island as well as multiple islands that was ruled by an Ali`i Nui or paramount chief. Historically, the *mokupuni* of Kaua`i has included the islands of Ni`ihau as well as Lehua.

Kaua`i Island has traditionally been divided into 5 *moku* including: Ko`olau, Halele`a, Nā Pali, Kona and Puna. The ali`i nui appointed *ali`i `ai moku* or district chiefs to manage the various *moku*.

Common district names that are universally used across of the Hawaiian archipelago include "Ko`olau" marking the windward sides of the islands; "Kona" - the leeward sides of the islands; and "Puna" - indicating regions where springs and fresh water abound.

The boundaries of the five *moku* on Kaua`i were changed in the late 1800s to reflect the present-day judicial land districts. The project is in Hanamā`ulu. The *ahupua`a* (traditional Hawaiian land division) of Hanamā`ulu is on the southeast coast of Kaua`i in the traditional Puna district and the modern Lihu'e judicial district, between the *ahupua`a* of Wailua to the north and Kalapakl to the south. The *ahupua`a* name means "tired (as from walking) bay" (Pukui et al. 1974:41). Wichman (1998:61) relates that Hanamā`ulu Bay was given this name because it was "off the main around-the-island trail and a traveler had to walk extra miles to get there."

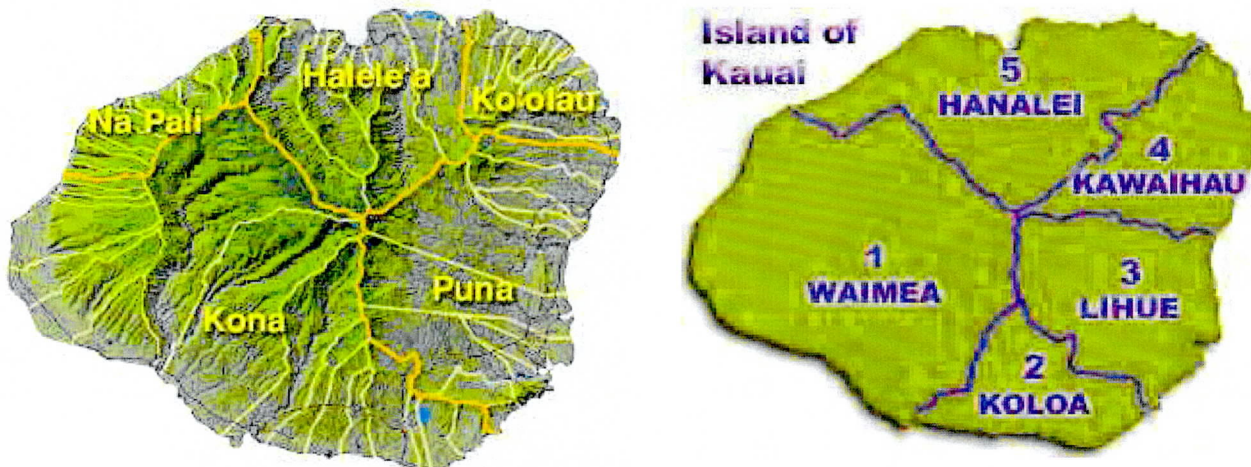
Historic documentation records the changing name of the district in which the *ahupua'a* of Hanamā`ulu is located. In earlier days, the *ahupua'a* was in the *moku* (district) of Puna, but today it is in the judicial district of Lihu'e (meaning "cold chill," or "gooseflesh").

The name, Lihu'e, applied in a larger sense, including the districts of what are now Kawaihau and Lihu'e, reaching from Anahola to the Gap, being made so by law in about the year 1861, according to early court records, but some years later divided into the present two districts. The large district was also known as the Puna district and is found on early maps as such. It was August thirteenth, 1880, that the district was divided into two, by act of Legislature with King Kalakaua's signature Lihu'e, in a local sense, and from which the name of the district was derived meant only that little portion of land upon which the present village, as consisting of bank, post office and store, now stands. [Rice 1914:46]

Hanamā`ulu was permanently inhabited and intensively used in pre-Western Contact (pre-1778) Hawai'i. As suggested by the *ahupua'a* name with its clear coastal references to the distinctive bay, the coastal zone of Hanamā`ulu was the locus for permanent habitation, *heiau* (religious structures), and numerous trails. Intensive agriculture, including irrigated *kalo lo 'i* (irrigated taro patches), covered the valley floodplain of the Hanamā`ulu River and extended 2.5 miles inland (Handy 1940:67). In these inland areas, taro patches were often in the gulches, while houses and sweet potato patches were scattered on the *kula* (dry land areas) on each side of the gulches (Handy 1940:154). Native forests were used for their resources (wood, birds, medicinal plants, etc.) and were used for the cultivation of such plants as *wauke* (paper mulberry), which were used to make their *tapa* clothing (Handy 1940; 198).

Traditionally, the districts were further divided into smaller land divisions known as, *ahupua'a* which included the abundance of land and resources from the mountain to the sea. Under the direction of the *ali'i `ai moku*, the *ali'i `ai ahupua'a* or land division chief was put in charge of governing the *ahupua'a*. The *ali'i `ai ahupua'a* appointed *konohiki* who served as the headman of the *ahupua'a* land division, and was solely responsible for the management of land, water and fishing rights. An ingenious concept, the ancient design of the *ahupua'a* system continues to be an excellent model for sustainability and land and natural resource management today. The common description that *ahupua'a* are "pie-shaped" is inaccurate. However, it is a general practice to apply triangulation of the 3-main boundary points of the *ahupua'a* when identifying its respective division lines. Additionally, *ahupua'a* do not terminate at the ocean ward boundary points. The boundary lines are purposely extended into the ocean so that it also includes the resources and minerals of the reef and ocean as well.

A major element of focus for this Ka Pa`akai analysis is based on the `āina or land that is the project area, as well as surrounding lands and natural resources that are linked to the project area. It is important to readers of this Ka Pa`akai analysis to have a basic understanding of the ancient land division system and the various words, terms and idioms associated with Hawaiian land designation and Hawaiian land use. This is especially helpful in identifying and relating to specific locations and place names that are pertinent to this study.



Figures 8 & 9 show Kaua`i Island Districts and Boundaries. Fig 8 on the left show the original moku of Ko`olau, Halele`a, Nā Pali, Kona and Puna. Fig 9 on the right show the revised boundaries and judicial land districts of Kawaihau, Hanalei, Waimea, Kōloa and Līhu`e.

Mo`olelo: Storied Origins & Traditional Places

Mo`o Ōlelo is the succession of talk; or the continuation and perpetuation of oral histories and traditions that were passed on in story and chant forms. It is from this that the word mo`olelo is derived - stories, tales, myths, legends, and chronicles; records of information that was storied in the memories of Hawai'i's ancient people. Another term that is used is *kā`ao* - oral traditions and myths that represent the cultural truths, wisdom, and experiences of *kūpuna*.

Throughout the Ka Pa'akai analysis, examples of traditional Hawaiian mo`olelo are presented to link the reader with traditional places, beliefs and practices associated with the ancestral worldview of Hawai'i's indigenous Hawaiian people. Mo`olelo and *kā`ao* are not viewed as fanciful fairy tales or fictional stories woven to entertain. Laden with skillful use of metaphors and poetic expressions, they are invaluable sources of information that have preserved a sense of consciousness and inner connection of the *kānaka`ōiwi* with his multidimensional world.

In one account of the legend of Kawelo, he is said to be born in Hanamā`ulu (Fornander, 1918-1919 Vol. 2:2). After many battles with Aikanaka (his cousin), whom he eventually vanquishes, he retires to his parents' old house in Hanamā`ulu (Fornander, 1918-1919 Vol. 2:70-71). Hanamā`ulu is also mentioned in the story of Pele, where, in a jealous rage she covers Lohiau (her lover) with lava. Two of Pele's brothers bring him back to life and one brother transforms himself into a canoe and they sail to Kaua'i landing at Ahukini. Lohiau then goes to Hanamā`ulu where he found all of the houses closed save one where two men were making *tapa*. They all walk to Kapa'a where Lohiau is eventually reunited with Hiiaka, Pele's sister (Rice, 1923:7-17).

To the east, just above the project area, is Kalepa ridge and its highest peak, Kalepa, which means "trader, merchant salesman, peddle and to trade, sell as merchandise, peddle or to flutter or wave" (Pukui et al, 1986:122). It literally means to "strike flag" which a salesman would do to signal items for barter. A heiau, Ka-lau-o-ka-manu (tip of the end piece of the canoe) was located at the base of Kalepa and thus its name. It was said to be used for human sacrifices and feared by travelers who hurried past it because of the bad smell (Wichman, 1998:61). Thrum (1906: 40) described the heiau as "a large walled heiau that stood above the present mill; destroyed about 1855. Of pookanaka class." There are two stones beside the heiau, and the story is that Chief 'U'u-kani-pō was betrothed to Ka-lau-o-kamani, a chiefess of Hanamā`ulu. 'U'u-kani-pō went to see Ka-lau-o-kamani with his friend Ka-ipo-lei-manu. They were walking down a path toward Kalepa from Kilohana Crater when they encountered a

woman who told them to turn back. She told them not to go near Ka-lau-o-kamani but to go back toward the mountains to seek her sister, Moeapaki'i and marry her. 'U'u-kani-pō recognized her as Ka-lau-o-kamani's ghost and was determined to find out what happened to her. They hurried toward the village, but the stench was so strong they were overcome and turned into rocks. These rocks guard the path as a warning to travelers (Wichman, 1986:62).

Kilohana crater is a small collapsed shield volcano that straddles the ahupua'a of Hanamā'ulu and Haiku to the west. The name Kilohana means "vantage point" (Wichman, 1998:60). In the Legend of Kamapuaa, the warrior and a friend Limaloa journey from Kipu looking for the two daughters of Kaneiki. They come upon them at Kilohana in a valley overgrown with kukui trees where they were gathering kukui nuts (Fornander, 1959:230). Kamapuaa later defends Kaneiki in a battle with Makalii and his warriors. Kukui is also mentioned in the story of Kila, son of Mo'ikeha, who goes to Ra'iātea to bring back his father's foster son, La'a-mai-Kahiki. At each stop in Ra'iātea he encounters several questions, one is what he (Moikeha) is doing and where the kukui blossoms of Puna change; where the waters of Wailuā stretch out..." (Wichman, 2003: 31). Kilohana was also known for a particular kind of maile, maile ku (Fornander, V5, 1918: 616).

The significance and merit of mo`o `ōlelo - what an ingenious tradition of transmitting wisdom, knowledge, history and more through the succession of the voice conveyed through the telling of stories and the perpetuation of the art form of chants and the oral traditions that inspire the essence of indigenous Hawaiian cultural practices and beliefs.

*He Hu 'eone ka makani o Nawiliwili
 He Wiimua ka makani o Kalapakf
 He 'Ehukai ka makani o Ahukini
 He Piihola ke kiu holo ki 'i makani
 Lele kula o Lrhu 'e
 He Kuli'iihiu ka makani o Kapaia
 He Ho 'oluako 'inehe ka makani o
 Hanamii 'ulu
 [Ho'oulumahiehie 2006a:18; 2006b:17]*

The wind of Nawiliwili is a Hu'eone
 The wind of Kalapakl is a Waohue
 The wind of Ahukini is an 'Ehukai
 A Pahola wind is the scout that fetches
 the winds sweeping the Liiu'e .. plains
 The wind of Kapaia is a Kuli' ahiu
 The wind of Hanama'ulu is a Ho'oluako'inehe

The name of the wind (*makani*) of Hanama'ulu, "Ho'oluako'inehe ", is not translated, but several Hawaiian winds begin with the term *ho 'olu'a*, which is a strong, or forceful wind (Kent 1986:438). The name of the *makani* of neighboring Kapaia "Kuli'ahiu" is also uncertain but "ahiu" is a name for a wind of Kahana O'ahu with a connotation of "wild" or "untamed" (Pukui and Elbert 1984:7).

In the story of Kuapaka' a, the hero chants the winds of the Kaua' i for his father Paka' a:

He alaoli ko The alaoli is of Huleia,
He waikai ko Kalapaki, The waikai is of Kalopaki,
He kaao ko Hanamaulu The kaao is of Hanamaulu,
 [Fornander 1918a:5:96-97]

Hanamā'ulu Wahi Pana

Place names and *wahi pana* ("legendary place") (Pukui and Elbert 1986:377) are an integral part of Hawaiian culture. "In Hawaiian culture, if a particular spot is given a name, it is because an event occurred there which has meaning for the people of that time" (McGuire 2000:17). The *wahi pana* were then passed on through language and the oral tradition, thus preserving the unique significance of the place. Hawaiians named all sorts of objects and places, points of interest that may have gone unnoticed by persons of other cultural backgrounds.

Hawaiians named taro patches, rocks and trees that represented deities and ancestors, sites of houses and *heiau* (places of worship), canoe landings, fishing stations in the sea, resting places in the forests, and the tiniest spots where miraculous or interesting events are believed to have taken place. (Pukui et al. 1974)

There are a few *wahi pana*, notable places, that have associated stories explaining the origin of the names. One of the inland streams in Hanama'ulu is Waiahi, which means "fiery water." This stream merges with Waiaka, "reflecting stream." The water of this stream was the body of a *kupua*, a supernatural creature that could take several forms. One day the villagers on the stream caught 40 'o 'opu (gobies) in a bamboo trap. They ate all the fish, without sharing any with their neighbors. Overeating gave them diarrhea, a fitting punishment for their disrespect, greed, and selfishness (Wichman 1998:60).

The suggestion of inhospitality at Hanama'ulu recorded by Rice ("Lohiau found all the houses but one closed") is reminiscent of the Hawaiian proverb

No Hanamli 'ulu ka ipu puehu, or "the quickly emptied container belongs to Hanama'ulu" (Pukui 1983:252), which implies the food containers of Hanama'ulu were often bare—a plausible reason for the local residents to be stingy.

Hanamā'ulu literally translates to "tired (as from walking) bay" as related by Pukui (Pukui et al. 1974:41). Hanamā'ulu was a term "used to describe the many extra miles a traveler needed to walk in order to get to this location; travelers would often arrive with sore feet" (Wichman 1998:61). Hanamā'ulu was also the name of a village (Pukui et al. 1974). The ahupua'a of Hanamā'ulu occupies a narrow section of Kaua'i nestled on the southeastern side of the island between three distinctive land features—Kilohana Crater, Ka'ili'iliahinale, and Kālepa.

Kilohana Crater ("vantage point") is located west of the project area. The place name refers to the crater's exceptional views over the surrounding landscape. The crater marks the upper (*mauka*) boundary of Hanamā'ulu Ahupua'a (Wichman 1998:60). The upper slopes of Kilohana Crater feed the streams of Waiahi ("fiery water") and Waiaka ("reflective stream") which originate at elevations of 2,500 ft and 1,640 ft, respectively. These waters, considered to be *kupua* (the bodies of supernatural beings), flow into Kapaia Reservoir and then into Hanamā'ulu Stream (also called Kapaia Stream), before exiting at Hanamā'ulu Beach Park (Wichman 1998:60).

Another peak is called Ka'ili'iliahī, meaning "pebblestone of the clear fire," a reference to the stones used in playing the Hawaiian checker game called *konane*. Wichman (1998:62) speculates this might be a good place to find small pebbles that could be used for game pieces. Ka'ili'iliahinale peak is part of the Kālepa Ridge that runs along the eastern boundary of the project area. Ka'ili'iliahinale is the northernmost peak within Hanamā'ulu Ahupua'a. This peak may have been a source for the red stones used in *kōnane* in which one player used white stones and the other either black or red stones (Wichman 1998:62–63). This *pu'u*, or peak/hill, called Ka'ilihinalea in Rice's (1923:49–50) version of this story is associated with a story of two brothers, Wa'awa'aikina'auao and Wa'awa'aikina'aupo, The-Wise-One and The-Stupid-One, who lived on the flats of Nukole between Hanama'ulu and Wailoa [Wailua] Stream. Nukole is probably a reference to Nukoli'i, a beach area on the boundary between Hanama'ulu and Wailua Ahupua'a (Clark 1990:6). One day they traveled inland up this ridge to collect birds. The-Wise-One said that he claimed all the birds with two holes in their beak. At the end of the day, he had all the birds and his brother had none. The-Stupid-One told his mother what his brother had done, and she explained to him the trick and devised a scheme for his revenge. The next time they went to the bird grounds, she told her son to pluck all the feathers off the birds, to smear his

body with breadfruit gum, and then roll in the feathers. He snuck up behind his brother and yelled "Apau! The akua of the mountain is after you! He will grab you!" (Rice 1923:50). This frightened his brother so badly that he dropped all his claimed birds, which The-Stupid-One then claimed for his own (Rice 1923:49-50; Wichman 1998:62-63).

Kālepa ("to flutter") is the third peak in the *ahupua'a* (Wichman 1998:61). This peak is part of the Kālepa Ridge located along the eastern boundary of the project area. Kālepa peak was purportedly used in pre-Contact times for signaling messages (Damon 1931:913). The place name, Kālepa, may refer to the peak's function as a signaling station.

There are caves in the cliffs of Hanama'ulu. One of these is called Na-pali-'o'oma-o-, the concave cliffs of Hanama'ulu. A man named Pueo lived here and could not find a wife to satisfy him. He traveled all the way to O'ahu and met a woman named Ke'alohiwai who had also refused to take a mate, saying she was waiting for the man of her dreams. When the two met, they recognized each other as the one they had been waiting for and Pueo and Ke'alohiwai returned to Hanama'ulu to live in the caves, which were named Ke'alohiwai after the couple's death (Aukai n.d.; Wichman 1998:62).

These *mo'olelo* contain several recurrent threads. Canoe landings are mentioned and would have been easy in the uniquely protected environs of Hanama'ulu Bay. Whether arriving by canoe or land, travelers did not find much sustenance here, either due to lack of resources, the tight-fisted nature of the residents, or both. Finally, it is likely Hanama'ulu was the residence of some *ali'i* (chiefly class)-status individuals, as suggested in the *mo'olelo* of Kawelo and the presence of a major sacrificial *heiau* (temple), Kalauokamanu.

Hawaiian Religious & Cultural Practices, Gathering Rights in the Hanamā'ulu Ahupua`a

A field investigation of the project area on April 1, 2025, by the author, a qualified archaeologist, resulted in no evidence or findings of significant plants or natural resources that are associated with Hawaiian gathering rights for subsistence, cultural or religious practices. Since this parcel is inland nothing on this parcel has affected traditional access.

A Connection and Understanding of Place Traditional Wisdom & Knowledge

Over the years, residents have lost touch with the place names and their meanings for this area. The habit of identifying traditional landmarks whether they are mountains, beaches, etc. by generalization is common. A greater misfortune is the more popular trend and use of nicknames created by recent generations of transient and kama`āina residents. Disappointedly, this has resulted in the greater loss of knowledge and awareness of traditional Hawaiian places and wahi pana.

Knowledge of wahi pana and their place names for both subject ahupua`a of this Ka Pa`akai analysis are on the verge of being forgotten and lost altogether. There is a sense of urgency to bring this to the forefront of our collective attention and create learning opportunities for the native Hawaiian community.

Hanamā`ulu is considered the birthplace of High Chief Kawelo.

Land Commission Award Claims Hanamā`ulu Ahupua`a and Associated Knowledge

Land Commission Awards and Mahele Awards are Sources of Title adjudicated by the Land Commissioners to claimants. Mahele Awards are Sources of Title specifically issued to those chiefs who received their lands from the king but failed to present their claims before the Land Commission and thus received titles to their lands from the Minister of the Interior. Kamehameha Deeds are Sources of Title to Crown Lands that Kamehameha III, IV and V conveyed. Minister of Interior Deeds were Sources of Titles that conveyed lands from the government to private individuals by the Minister of the Interior during the Kingdom of the Monarchy. Patents - both Royal and Land - were issued on the awards as evidence that the Government's right to commutation therein was satisfied. An award together with a patent perfected the awardee's title to the property. Grants by Royal Patent and Land Patent were Sources of Title deriving from the sales of government lands. The term "Royal" indicates that the document was issued during the Hawaiian Monarchy (up to 1893). The Land Patent or Land Patent Grant thus means the document was issued after the monarchy.

The Kuleana Act of 1850 allowed maka`āinana (Native Hawaiian commoners), in principle, to own land parcels at which they were currently and actively cultivating and/or residing. In the period of the Māhele and kuleana claims (1848-1853), Victoria Kamamalu was awarded the ahupua`a of Hanamā`ulu

as part of a *konohiki* award, LCA 7713, 'Apana (Lot) 2 (Waihona 'Aina 2022). Since the *ali'i* and *konohiki* were not required to record the use of their large land awards, the surrounding smaller *kuleana* awards of the *maka'ainana* assist in identifying land use of this area of Hanamā`ulu. Twenty *kuleana* parcels were claimed within Hanamā`ulu Ahupua'a. Of these parcels, five were not awarded (LCA 2659*K, 3370, 3392B, 3641, and 5640B) due to undocumented circumstances. The *kuleana* parcels were along the wide *makai* flood plain of Hanamā`ulu Stream and only extend about 100 m *mauka* of the Kapaia Bridge on Kuhio Highway (no *kuleana* parcels were in the vicinity of the project area). *Kalo* (taro), the major staple, was cultivated in these river flood plains. The *kuleana* mentions small *kula* (plain, field) where sweet potatoes and other produce were presumably grown.

Nearly every LCA claim in Hanamā`ulu contained an 'auwai (ditch), necessary for *lo'i* cultivation. The claims for LCA lots in Hanamā`ulu mention that Hawaiian *hale* (houses), *lo'i*, and *kula* lands (lands used for dry land agriculture or pasture) were located along both sides of Hanamā`ulu River, extending from the shore up to the village of Kapaia. The *lo'i* and *kula* lands were often included together in one 'iipana, with house sites belonging to separate 'iipana. Overall, the LCA documentation indicates indigenous Hawaiian subsistence activities being practiced in and around Hanamā`ulu Stream (Waihona 'Aina 20255).

This project is believed to have had a very low level of traditional Hawaiian use (no LCAs in the project area vicinity) and no historic use prior to sugar cane field development. There are no *hoa'āina* (commoner) Land Commission Awards (LCA), or *kuleana* parcels, in the project area. This does not, however, mean Native Hawaiians did not occupy this landscape prior to cane cultivation.

Although many Hawaiians did not submit or follow through on claims for their lands, the distribution, and written testimonies of LCAs provides insight into patterns of residence and agriculture. Many of these patterns probably existed for centuries. By examining the patterns of *kuleana* LCA parcels, insight can be gained into the likely intensity and nature of Hawaiian activity in the area at the time.

LCAs identify traditional land use, but mostly in lowland areas. Mentions historical disturbances post-Kamehameha unification affecting land control and cultural continuity. Confirms midland area was likely underutilized in traditional periods. The coastal and river valley areas of Hanamā`ulu were more likely zones of traditional agriculture and habitation. The midlands, where this project is located, were minimally or never occupied traditionally. Some references suggest possible use of the uplands for limited agriculture like sweet potato, breadfruit and coconuts.

Table 1. Land Commission Awards in Hanamā'ulu Ahupua'a including LCA Number, Claimant Name, 'Ili, and Notes on Land Use

LCA Number	Claimant	'Ili	Land Use
2659	Kanoa, Paulo	Kikiaola	Claimant abandoned claim
3271	Lalahilimoku	Kuha, Puaka Village	'Āpana 1: five lo'i kalo 'Āpana 2: House lot
3370	Naehu	Kapaia	Three lo'i kalo under cultivation and five lo'i kalo not cultivation; kula 'āina adjoining where house lot lies Claimant received land from his father; claimant cultivated the land under his father and at the death of his father he inherited the land
3371	Naehu	Kapaia	Ten lo'i kalo, small kula 'āina, and house lot; Claimant received land from his son-in-law, Kailihania after he came to Kaua'i; Naehu passed away in 1849 and gave the land to his daughter, Kaipu
3392B	Kala	Opae/Opai	Three lo'i kalo
3423	Paka	Peaiki/Opeaiki	Eight lo'i kalo, small kula 'āina, and a house lot
3426	Pelekane	Kapuhala, Kahoea	Four lo'i kalo (in the 'ili of Kapuahala) House lot near the seashore (at Kahoea)
3558	Keke	Hoewa, Waiaao, Hoena	Three lo'i kalo in the 'ili of Waiaao and a small kula 'āina adjoining Claimant has a house lot in the 'ili of Hoena Claimant received his land from his friend, Pekue, in 1846; Claimant received his house lot from Keo; Claimant previously held a house lot at Opai which was disputed by Keo the Konohiki; Claimant agreed to abandon his house lot in Opai and Keo agreed to give claimant house lot in Hoena
3600	Keolanui	Palaha	Lo'i (irrigated terrace) and a house lot
3640	Kumakahaohao	Limawela, Kamakahanahana	Not available

LCA Number	Claimant	'Ili	Land Use
3641	Kuhaimoana	Kapaia	'Āpana 1: Six lo'i kalo in the 'ili of Kapaia 'Āpana 2: House lot in the 'ili of Kapaia Claimant received his land from Keo in the days of Kaikioewa
3644	Kauaulapa	Hanamā'ulu	'Āpana 1: Three lo'i kalo in the 'ili of Hanamā'ulu 'Āpana 2: House lot in the 'ili of Hanamā'ulu Claimant received his land from Pau soon after Kanoa came to Kaua'i and has had occupied it ever since; there is no disputes to this claim with the exception to the ownership of an orange tree standing on the land; it was planted by a maka'āinana who died and his heir held onto the tree for years; in the days of Kaikioewa the chiefs took possession of the tree and have held it ever since
3647	Kapuahi	Waieo and kū (also called an 'ili kūpono; nearly independent 'ili land division within an ahupua'a paying tribute to the ruling chief, not the chief of the ahupua'a) of Papua'a	'Āpana 1: One lo'i kalo called Moala in the 'ili of Waieo 'Āpana 2: Eight lo'i cultivated (an additional 23 lo'i that are not under cultivation) 'Āpana 3: House lot in the kū of Papua'a
3648	Kala, Gapeliela	Hoa, Wailua, Kalaniuli	'Āpana 1: Three lo'i cultivated and several not cultivated; kula 'āina in the 'ili of Hoa 'Āpana 2: Three lo'i cultivated and several not cultivated; kula 'āina in the 'ili of Wailua 'Āpana 3: House lot in the 'ili of Kalaniuli
3649	Kamalo	Noni	Five lo'i kalo in the 'ili of Noni and a small kula 'āina adjoining; house lot (on kula 'āina)
3650	Kaluhiwaha	Ka'aukai, Pukakolu Village	Two lo'i kalo in the 'ili of Ka'aukai; claimant has a house lot in the kūlanakauhale (village) of Puakakolu

LCA Number	Claimant	'Ili	Land Use
3653	Koli'i	Maulili, Kamakaihanahana Village	Four lo'i kalo with a small kula 'āina adjoining in the 'ili of Maulili; the kula 'āina is not being cultivated; enclosed house lot in the village of Kamakaihanahana
3657	Niho	Limawela	Four lo'i kalo in the 'ili of Limawela with a small kula 'āina adjoining Claimant had his land from Pau in the year of 1846 and occupied it in the peace until the time of his death which occurred soon after his claim was sent to the Land Commission; the claim was never disputed until Keo became luna (overseer) in 1849; Keo swore that he took away two of the lo'i kalo because they were old kō'ele (small land unit by a tenant for the chief) and Pau had no right to give them away and in accordance with instructions from Kanoa to ho'oponopono (to correct) the lands he took these two old kō'ele; Kalohe, son of Niho, is his heir and prosecutes the claim
5089	Kuhaimoana	Not available	Kuhaimoana died in 1848, therefore his lands were returned to the konohiki
5640B	Kumakahaohao	Kamakahanahana, Limawela	Four lo'i kalo and a small kula 'āina adjoining

Early Accounts of Hanamā'ulu

Hanama`ulu Sugar Company, established in 1870 (Conde and Best 1973: 165). The Hanamaulu Mill was erected in 1877 and was recorded in an 1885 map of Hanamā'ulu Bay by Lt. George G. Jackson. The mill was located within Hanamā'ulu village (Martin and Pierce 1913:512). The stone foundations for the mill were pillaged from the neighboring Kalauokamanu Heiau (Damon 1931:745). The mill was located along the foot of Kālepa Ridge and consisted of a whitewashed building, with high walls, many windows, and a sheet-iron smokestack (Damon 1931:746-747).

The Lihu`e Plantation Company was first established in 1849 by Henry A. Pierce, Judge William Little Lee (the chairman of the Land Commission), and Charles Reed Bishop. Together they formed Henry A. Pierce and Company. The first 3,000 acres were purchased in Nawiliwili and an additional 300 acres were purchased in Ahukini in 1866. It featured a 10-mile-long Hanama`ulu Ditch built in 1856 by plantation manager William H. Rice, which was the first large-scale irrigation project for any of the sugar plantations.

The success of Lihu`e Plantation allowed it to continue to expand. When the owner of Hanamā'ulu Ahupua'a, Victoria Kamamalu, died in 1870, all 9,177 acres (according to the acre number in the Mahele award) in the ahupua`a were purchased by Paul Isenberg (manager of Lihu`e Plantation from 1862-1878), who established as a separate company, the Hanama`ulu Plantation. The land commission report was in error, however, and the deed to the tract found that the early Mahele survey had underestimated the acreage, which was something over 19,000 acres. An even later survey placed the acreage at 17,000 acres. In 1898, Hanama`ulu Plantation merged with the Lihu`e Plantation (Conde and Best 1973: 165). The extent of the sugarcane fields near the turn of the nineteenth century can be seen in an 1878 Hawaiian Government Survey map by Alexander. In this map, there are not yet sugarcane fields depicted in the current project area; however, well before 1910 the project area was heavily altered by the cultivation of sugarcane. The railroads of the two companies also connected and merged.

The expansion of Lihu`e Plantation's sugarcane cultivation accelerated throughout the area in the early decades of the twentieth century, transforming nearly the entirety of the traditional landscape of Hanamā'ulu . By 1931, Lihu`e Plantation had 6,712 acres in cane. The Lihu`e Plantation Map in 1939 shows the extent of the lands making up the Lihu`e Plantation and indicates the project area is within sugarcane fields. Railroad tracks are shown north of the project area in 1939. The USGS 1960 map shows permanent railroad track to the north and south of the project area. By 1960 the train tracks were gone with

cane hauling accomplished by trucks. Lihu'e Plantation ceased operations on November 17, 2000, after 151 years of sugar production (Kauai Museum 2015: Lihu'e Plantation Company).

As sugar production increased and shipping vessels became larger and drew more water, a modern wharf was needed where ships could draw up alongside and load and unload supplies and passengers. Operations for this large harbor, the most modern harbor in the Islands, began in 1921, with the establishment of the Lihu'e Plantation-sponsored Ahukini Terminal & Railway Company (AT&R), which operated until 1934 (Conde and Best 1973:165). The AT&R railway track traversed the coastline from Ahukini Pier at Hanamā'ulu Bay to Kealia through today's Wailua Golf Course and the Kauai Beach Resort.

On an 1878 Hawaiian Government Survey map (W.D. Alexander), a trail is depicted that originated from Koloa to the western rim of Kilohana crater eventually intersecting with Mā'alo Road at a point north of the project area. This trail mentioned by Ethel Damon in Koamalu who is recounting the description by Reverend Hiram Brigham in his book, *A Residence of Twenty-One Years in the Sandwich Islands*, published in 1847:

In 1824, when walking around the island from Waimea to counsel the people after the wreck of The Cleopatra's Barge, Rev. Hiram Bingham crossed from Hanapēpē, as has been seen, over the old upland trail back of Kilohana, and wrote of it as "a country of good land, mostly open, unoccupied and covered with grass, sprinkled with trees, and watered with lively streams that descend from the forest-covered mountains and wind their way along ravines to the sea, - a much finer country than the western part of the island." (Damon 1931: 401).

This trail was determined to be more upland near the Kilohana crater area and not in the project area.

Archaeology of Hanamā'ulu

There have been a few archaeological surveys in parts of the project area for the for various projects. Most of the historic properties and features found were plantationera sites. On Kālepa Ridge near the Hawaiian Tel building, the author many years ago found a sandalwood pit. Traditional sites have been found on Kālepa Ridge include heiau and burial sites.

Bennett (1931) is the first to mention the archaeology near the project area in his book, *Archaeology of Kauai*. Bennett (1931:125) describes Kalauokamau Heiau (SIHP # 50-30-08-102) as "a large walled heiau" that was of *po'okanaka* class.

Bennett indicates the *heiau* was located at the foot of Kālepa but was destroyed in 1855.

In 1990, PHRI conducted an archaeological field inspection and subsurface testing for the Kālepa Radio Station and Kālepa Road Improvements project area, on Kālepa Ridge in Hanamā'ulu Ahupua'a. SIHP # -1827 was identified which contained 2 burials which were disinterred. The area of the burials (SIHP # 50-30-08-1827) appeared to have once been a quarry and/or flake reduction activity area.

In 1991, Walker et al. conducted an archaeological inventory survey of lands in Hanamā'ulu, Kalapakī, Nāwiliwili, Niumalu, and Wailua. Although the survey identified nearly a dozen archaeological sites, only one was located near the current project area. This site consisted of a historic cemetery (SIHP # -1844).

Kikuchi and Remoaldo (1992) conducted a survey and inventory of the cemeteries on Kaua'i. Cemeteries and plots inventoried in Hanamā'ulu and near the project area include the Kaua'i Memorial Gardens (SIHP # -B008), and the Hanamā'ulu Immaculate Conception Church II (SIHP # -B009). Sites outside a 1km radius from the project area include the Kapaia Chinese Cemetery (SIHP # -B010), and the Immaculate Conception Roman Catholic Church Cemetery (SIHP # -B011).

Archeaological monitoring of the rock wall revetment for SIHP #-746 (a burial which was eroding out of a bank) was conducted in 1994.

T.S. Dye and Colleagues conducted an archaeological assessment for the proposed Cingular Wireless Kālepa Grove Farm Cell Site (Dye and Jourdane 2006). Based on existing historical literature and previous archaeological documents, it was deemed possible that human burials and cultural deposits like those found at Kālepa Ridge could be encountered in the area.

Another study was conducted in 2014 Archaeological Inventory Survey conducted by Garcia and Associates for a 210-acre parcel in Hanamā'ulu (TMKs: (4) 3-8-002:002 and 3-8-003:001) revealed no significant traditional Hawaiian or early historic sites. The land, historically part of LCA 7713 to Victoria Kamāmalu, was heavily modified for sugarcane agriculture. This aligns with broader patterns of plantation-era disturbance in upland Hanamā'ulu and supports previous AIS findings indicating limited pre-contact use in these zones.

The second study was an archaeological inventory survey (AIS) was conducted by Cultural Survey Hawai'i (CSH) in July 2016 for the (SolarCity) Kapaia Solar Photovoltaic and Battery Energy Storage Project, Hanamā'ulu Ahupua'a, Lihū'e

District, Kaua'i, TMK: [4] 3-8-002:002 por. and [4] 3-8-003:001 por. CSH produced an AIS for Solar City in 2016. The 46.5-acre parcel is located approximately 500 feet northwest of the Kapaia Cane Haul Road near the intersection of the Cane Haul Road and Mā'alo Road. This is at one end of the proposed project area. CSH conducted subsurface testing at six locations on the parcel. Five backhoe-testing excavations (T-1 through T-5) were distributed throughout the project area to provide maximum coverage. The test excavations measure an average of 8.3 m long and 1.2 m wide with the base of the excavation determined by the presence of sterile and undisturbed natural deposits ranging from 1.5 m to 1.8 m. No subsurface historic and cultural materials were present or observed during the excavation. The observed stratigraphy includes an 18 to 50 cm deep plow zone (Stratum I) associated with the former sugarcane production in the area. The plow zone overlies a naturally deposited silty clay loam B horizon (Stratum II). The results of the individual test excavations can be found in the Final AIS dated July 2016. However, a single surface historic site SHIP 5-30-08-2311 was located. This is an irrigation ditch that ran diagonally across the property in a NW to SE direction.

An archaeological assessment by Cultural Surveys Hawai'i (Hammatt et al., 2009) for an 18-acre motocross project inland of Wailua Falls concluded that no historic properties exist in the area. The only feature, a ditch-like depression (CSH-1), was interpreted as a non-significant modern drainage feature. The site had been extensively modified by plantation activities, and the study recommended no further archaeological work.

Another study is an archaeological assessment (AA) which was conducted by SCS in 2016 (Wasson and Dega 2016) for the County of Kaua'i Adolescent Treatment and Healing Center on a 5-acre parcel at the southeast corner of the intersection of Ma'alo Road and Kapaia Cane Haul Road. SCS conducted a full pedestrian survey of the project area. SCS also excavated eight representative trenches (ST-1 through ST-8) on the 5-acre parcel. "No archaeological sites were identified during fieldwork.

A 2016 Archaeological Inventory Survey (Morris et al., 2016) for the proposed Kaua'i landfill and resource recovery park identified SHIP #50-30-11-2218, a network of 82 plantation-era features including irrigation ditches, culverts, and sluice gates—classified as significant under Criterion "d". No pre-contact features were found, but the area reflects the heavy engineering modifications from the sugarcane era. Mitigation was satisfied through documentation, with future monitoring recommended during construction.

An archaeological field inspection and archival research project conducted by Scientific Consultant Services (Powell et al., 2018) for the Kapaia Cane Haul Road 18-inch Main Project confirmed that no archaeological features or cultural sites

exist within the project corridor. The study emphasized the prior use of the area for plantation cane hauling and irrigation and concluded that no further archaeological investigation was required.

In 2022, an archaeological field inspection by Exploration Associates Ltd. (McMahon, 2022) confirmed that no cultural or historic properties were identified within the 10-acre project area proposed for the Kaua'i Asphalt HMA Plant in Hanamā'ulu. Due to extensive prior disturbance from sugarcane agriculture and cattle use, the study concluded there is low probability for intact pre-contact or historic resources and recommended no further archaeological work.

In 2025, EAL did another field inspection of Space X tower next to the Solar City. No historic properties were found.

Creed et al. (2006) provides a detailed synthesis of the settlement patterns and prehistory of the *ahupua'a* of Hanamā'ulu. This synthesis includes extensive research on how the *ahupua'a* fits into the settlement patterns of Kaua'i as a whole. The synthesis presented here is derived from Creed et al. (2006).

As pointed out by Franklin and Walker (1994: 17), two important *ahupua'a* and large rivers lie on either side of Hanamā'ulu lands. The first-Wailua *Ahupua'a*, home of the royal chiefs-lies immediately to the north. The other, Hule'ia River Valley and the *ahupua'a* of Ha'ikii, lies to the south beyond Nawiliwili and Niumalu. Thus, Hanamā'ulu *Ahupua'a* would be expected to have less varied pre-Contact resources than its more dominant neighbors, which had greater populations along large river valleys.

Hanamā'ulu, however, would hardly have been devoid of pre-Contact structures as traditional stories assign considerable importance to the region. They portray Hanamā'ulu as the birth and death place of Kawelo, a late seventeenth century paramount chief. They reference paths crossing Hanamā'ulu as well as frequent canoe landings, and they speak of several *heiau*, including the large Kalauokamanu *Heiau* at the south tip of Kalepa Ridge above the project area, where human sacrifice was conducted. Based on Mahele records, archeological surveys, and ethno-historical accounts, the population in Hanamā'ulu was concentrated in the lower stream valley (with *kuleana* LCAs only extending about 100 m upstream of Kapaia Bridge on Kiihio Highway) and near the shore. The *kula* lands were used for *wauke* and other dryland crops.

The large amount of *kula* land and the importance of the sugar industry in Hanamā'ulu dramatically altered land use patterns, perhaps more so than in prestigious traditional *ahupua'a* like Wailua and Ha'ikii. Many people moved away from the river valleys to make a living through cash crop agriculture. As a result,

Hanamā`ulu should have a very high number of cultural resources, both relatively and absolutely, related to sugar plantations.

Research indicates that this area has a history of plantation-era surface disturbance but no buried cultural deposits.

Native Hawaiian Cultural Consultation

It is the policy of the State of Hawaii under Chapter 343, HRS, to alert developers and decision makers, through the environmental assessment process, about significant environmental effects which may result from the implementation of certain actions. An assessment of cultural impacts gathers information about cultural practices and cultural features that may be affected by actions subject to Chapter 343 and promotes responsible decision making. Articles IX and XII of the State Constitution, other state laws, and the courts of the state require government agencies to promote and preserve cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups. Chapter 343 also requires an assessment of cultural resources, in determining the significance of a proposed project.

One of the most important parts of conducting a cultural assessment and study is to hold consultation with Native Hawaiian kūpuna or elders, Hawaiian cultural organizations, cultural practitioners, and individuals from the community who potentially have knowledge of traditional Hawaiian sites, resources and cultural practices that are related to the project area as well as to the adjacent and extended land areas of the Hanamā`ulu ahupua`a. Ultimately, the goal as preparers of this Ka Pa`akai Analysis is to produce a document that can be used to protect and preserve the valuable knowledge and traditional practices of nā `ōiwi kānaka, the Native Hawaiian people of these places.

EAL's goal was to meet with and interview a cross-section of indigenous Hawaiian people from the community; first and foremost, with kūpuna or elders that have memories and personal experiences of the project area and the surrounding lands in Hanamā`ulu ahupua`a. In addition, EAL was hopeful to receive their `ike or insight and knowledge about customary practices and traditional places associated with or relating to the project area.

EAL also aimed to seek out and speak with those of the mākuā or parent generation who had potential knowledge, ties and experiences linked to the project area and Hanamā`ulu area. In this endeavor to "interview" Native Hawaiians, EAL chose to do so in a Hawaiian manner of kukākukā or through "talk-story". In speaking with interviewees without being nīele or as a prying meddler by being annoyingly inquisitive was the approach. While there are

specific points of interest for questions that lead the discussions, it is important that with each person engage in a manner that is respectful and without imposing pressure. To the Native Hawaiian, a nīele person will never get anywhere by being bold, blunt and direct. However, he or she can be successful by leading up to a subject through indirection and a more `olu`olu or gracious approach. Every attempt to avoid being maha`oi or presumptuous, brazen and insensitively forward was used. In the traditional Hawaiian household that was led by kūpuna and mākuā who were adamant that the values of aloha (love), ha`aha`a (humility), ahonui (patience) and hō`ihi (respect) apply to the way that one behaves and interact with others. This is especially so when talking and meeting with kūpuna, for with the slightest tone of pejorative stance or speech, they will cease to share their valuable insight and experiences. It helps tremendously to have some sort of association with individuals as well, for more is shared when there is a level of comfort, trust and familiarity.

The interviewees that EAL engaged with for this Ka Pa`akai analysis are:

- | | | |
|-----|--------------------|------------------------------------|
| 1. | Milton Ching | Kapaa Resident |
| 2. | Melanie Ching | Kapaa Resident |
| 3. | Allan Smith | Former Plantation Manager |
| 4. | Les Milnes | Kalepa Coalition |
| 5. | Lyle Tabata | Former Plantation Manager |
| 6. | Boyd Gayagas | Former Grove Farm Property Manager |
| 7. | Butch Durant | Hanamā'ulu Resident |
| 8. | Fredstan Kaluahine | Hanamā'ulu Resident |
| 9. | Haku Rivera | Hanamā'ulu Resident |
| 10. | Kaliko Santos | Ahu Moku Rep |
| 11. | Willam Pavao | Grove Farm Security and Rancher |
| 12. | Lei Rivera | Former Resident of land |
| 13. | Kanai Viado | School Teacher |
| 14. | Sabra Kauka | Cultural Practioner |
| 15. | Pat Kahawaiolaa | Kupuna, Hilo Resident |
| 16. | Sherri Cummings | Kapaa Resident |
| 17. | Kanani Kagawa | Lihue Resident |
| 18. | Ryan Fu | Hanmaulu Resident |
| 19. | Russel Fu | Grove Farm Leasee |

Most of the interviews were conducted by EAL in May 2024 – December 2025. Based on a Planning Commission Hearing on August 11, 2026, additional informants were attempted to be reached before the end of August 2026. Within the timeframe available for supplementing the Ka Pa'akai analysis through continued cultural consultation, representatives of EAL reached out to 8 additional community members; all with personal ties to nearby areas and

possessing unique knowledge relevant to the assessment. Most interviewees were residents of the Puna district and had a connection to Hanama'ulu. (Appendix A - Notification Letter). Appendix B is a correspondence log. Subsequently, EAL found that most of the interviewees were very knowledgeable about the area its resources as well as the Hanamā'ulu area. Most of them know about the project area. None of them knew about any current traditional activities that were or have been conducted on the parcel.

As such, the priority topics needed to conduct this Ka Pa`akai analysis of cultural resources and impacts were overshadowed. It was a challenge to steer conversations into that direction without appearing to be presumptuous and insensitive to the needs of the interviewers to be informed of the project. EAL spent a considerable amount of time attempting to provide an overview of the project.

On behalf of the applicant, EAL continued cultural consultation with individuals from Hanama'ulu or those with familial connections who may possess knowledge of traditional cultural practices and resources within the petition area.

During consultation, there were little to no responses by some cultural practitioners who expressed concerns regarding this project area during the Planning Commission Meeting held on August 11, 2026. However, the applicant intends to continue cultural consultation to further inform and supplement the Ka Pa'akai analysis. This approach reflects the importance of protecting culturally sensitive knowledge and honoring the protocols and trust established during consultation.

The absence of or limited documentation of certain cultural knowledge within this report should not be interpreted as an absence of cultural resources or traditional practices.

Melanie Ching, who is part Hawaiian, shared that her father was adopted by Peter and Emma Christian in 1939. Her hanai grandfather, Peter Claus Christian, was born in Hanamā'ulu in 1900, and was employed with the Līhu'e Plantation until his death in 1959. Her great grandfather was the first Manager for Hanamā'ulu Sugar Mill and they lived in a house on the top of Kapaia hill with their 12 children. The house still stands today. She is not aware of any ancient trails within the property or any traditional and customary practices in the project area.

Milton Ching, also of Hawaiian and Chinese ancestry, was born in Līhu'e. His father and their siblings were born in Hanamā'ulu from the year 1912 – 1921. His grandmother's father was Sam Paku who lived in Hanamā'ulu, worked in

Ahukini docks, was a fisherman, and worked for Līhu'e Plantation until he died in 1952. His great grandfather's wife was born in Kapaia Valley on kuleana land in 1874, some distance from the project area. His Chinese grandfather resided in the "Chinese camp" in Kapaia valley amongst other Chinese workers. Milton shared a publication about Nāwiliwili which described the halo (kalo) field prior to the plantation but he is not sure if it went mauka to Kapaia. He is aware of some hunting up mauka, but it was usually with permission and access through the plantation. Milton is not aware of any trails or traditional gathering within the property.

Allan Smith and Lyle Tabata, former manager for Līhu'e Plantation and Allan, former manager also for Grove Farm. Lihue Plantation began phasing out hauling of cane from trains in the 1950s and the last load of train hauled cane was in September 1959. He also noted that cane haul roads were mostly built along former railroad routes. Mr. Smith nor Mr. Tabata is not aware of any burials, trails, or cultural significance within the project area.

Les Milnes, part of the Kalepa Coalition and rancher did not know of anyone who was accessing the area for traditional cultural rights. His father worked for the plantation. Many years ago, Les took the author through the project area to where the picnic locations and water holes for the workers, as well as ditchman's houses, ditches and plantation features.

Boyd Goyagas, for many years, was the Grove Farm Property Manager, no hunting was allowed in the area. He also had his ranch and farmlands in this area. Occasionally hunters tried to hunt but not claiming any TCR.

Butch Durant was mainly concerned about taro and lo'i. He did not know of any traditional cultural practices on this parcel. Butch knew more about the Hanamaulu valley area well below the project area.

Fredstan Kaluahine grew up in this area as well as Haku Rivera. Both knew of no concerns or TCR being impacted.

Kaliko Santos is the Aha Moku representative for the Puna District which includes Hanamā'ulu Ahupua'a and Kapaia and she is also the OHA Kaua'i senior staff. But more relevantly, Kaliko's father worked for Līhu'e Plantation driving workers to and from the job site and remembers how close the plantation families were. She also remembers her mother would tell them that when you see a coconut tree in the middle of a cane field or an empty field that usually means a Hawaiian used to live there. Kaliko talked to her 'ohana and they are not aware of any cultural resource or traditional practice that was historically or currently being exercised within the project area.

William Pavo is the current Security Officer for Grove Farm Co. lands. He comes from Kalaheo. He stated that he has not seen anyone who has requested TCR access in these lands.

Sabra Kauka interviewed Lei Rivera and Kanani Viado. All three knew of any cultural traditions or traditional rights that were currently being practiced.

Nancy McMahon, the author of this study, also leased lands for pasture for horses and never ran into anyone who claimed any TCR in this area.

Interview with Llewellyn "Uncle Billy" Kaohelaui'i

On August 24, 2026, a representative from Exploration Associates Limited (EAL) met with Mr. Llewellyn "Uncle Billy" Kaohelaui'i and his life partner Ms. Terrie Hayes at his residence in Kōloa. The following information was shared during this consultation.

Mr. Kaohelaui'i, widely known in the community as "Uncle Billy," has resided in his family home in Kōloa for over 75 years. A respected fisherman and cultural practitioner, Uncle Billy has cultivated a lifetime of generational knowledge and a deep, lived connection to the land ('āina), shoreline, and nearshore waters of Kōloa. His 'ike reflects continuous observation, practice, and stewardship of coastal and upland resources.

Uncle Billy is a founding member of Hui Mālama o Kāneiolouma and currently serves as the 'Aha Moku Po'o for Kaua'i and the Moku Representative for Kōloa/Weliweli. Through these roles, he actively participates in protecting traditional and customary practices, cultural resources, and the perpetuation of 'ike kūpuna within the ahupua'a system.

Ms. Terrie Hayes has resided on Kaua'i for over 20 years. A former educator with the Hawai'i Department of Education, she is a founding member of Hui Mālama o Kāneiolouma alongside Uncle Billy. She is also an active member of Friends of Māhā'ulepū and contributes to the 'Aha Moku Council of Kaua'i. Her work reflects a commitment to cultural preservation, environmental stewardship, and community-based advocacy.

Uncle Billy indicated he was unfamiliar with the project area and deferred to the Aha Moku West Puna Representative, Kaliko Santos. Ms. Santos's initial interview has been recorded and included in the initial analysis.

Uncle Billy did recall the lands were historically used for mahi'ai (traditional agriculture), supported by freshwater resources prior to the sugar plantation.

Several Cultural Impact Assessment Studies have been conducted for various projects near this project area: County of Kauai Adolescent Treatment and Healing Center (ATHC) (SCS 2016); Proposed Municipal Solid Waste Landfill and Resource Recovery Park Hanamā'ulu and Wailua Ahupua'a, Līhu'e District, Kaua'i (CSH 2013); Replacement of Hanamā'ulu (Kapaia) Stream Bridge, Kūhiō Highway, Approximately Between Mileposts 1.1 and 1.3, (CSH 2013) and Archaeological, Historical, and Cultural Impact Assessment For the Kapaia Cane Haul Road 18-inch Main (Ku'iwalu Consulting, 2018). The conclusion of these studies under the Ka Pa'akai Case determined that there are no known traditional and customary Native Hawaiian rights being exercised in this area currently.

Mahalo a nui loa iā `oukou for your generous support to contribute and collaborate to this success of this Ka Pa'akai analysis.

Community consultations have emphasized ongoing traditional and customary practices in the midlands of Hanamā'ulu. Long-time residents like Joe Rosa recalled gathering shellfish in the Bay, farming taro in the valley, and using native plants such as wauke and hala for cultural uses. These testimonies reinforce the cultural significance of upland resources and continuity of Native Hawaiian practices in the region .

Consultation Methodology & Results

As with the composition of the Ka Pa'akai analysis document, EAL employed interview methods consistent with indigenous Hawaiian values. Specific values and methods applied to the interview process included:

Kukākukā, also known among locals as "talking story", is a quintessentially Hawaiian approach to sharing information intended to avoid being seen as *nīele* (i.e., nosy or meddling) and instead being perceived as *'olu'olu*—gracious—in conduct. By approaching the specific interview topics in an indirect manner, EAL interviewers communicated a level of sincerity and respect for the interviewee and subject matter and so avoided their curiosity being interpreted as *maha'oi*, i.e., brazen and forward.

To this end, the use of recording devices and a standardized questionnaire were not employed unless requested to do so. Interviews were conducted in individual and small-group settings in homes and backyards. Conversations could flow toward, and at times away from, the specific subject of the project as the interview subjects deemed appropriate.

Selection of Interview Subjects

An assessment of cultural impacts gathers information about cultural practices and cultural features that may be affected by land use decisions. In the preparation of this Ka Pa`akai analysis, representatives of EAL identified certain criteria which guided the process of identifying individual's familiar with cultural practices and features in, or near, Hanamā'ulu ahupua'a. Was the candidate a *mākua*, or member of the parent generation, with potential knowledge, ties, or experiences of the project area and the Hanamā'ulu - Puna region?

- Was the candidate familiar with, or possessing insight into, the customary practices and traditional places in or near to the project area?

In the timeframe available for the preparation of the Ka Pa`akai analysis, representatives of EAL spoke with 14 community members all with personal ties to Hanamā'ulu; and possessed of unique knowledge relevant to the assessment. Most interviewees were residents of the district of Puna and had a connect to Hanamā'ulu .

Cultural Resources & Practices Identified

Neither the literature sources consulted, nor the interviews conducted identified any ongoing native Hawaiian cultural resources or practices located on the project. As indicated by background research and many of the interviewees, the broad Hanamā'ulu region does not have a rich history of *mo`olelo* (legends) and *wahi pana* (traditional place names and their stories) and those found none of these have any significant direct or indirect connection to the project site. In addition, the long history of ranching and some cultivation in this area has likely destroyed any cultural materials and since the land has been overgrown and privately owned, prevented cultural practices which might have been present in the past.

The informants did not know of any gather rights in the project area.

Analysis of Impacts

Upon a thorough review of the archival research, previous archaeological studies, site inspection, and numerous written and oral cultural consultations, we were unable to document any cultural or natural resources within the proposed project

area. The large amount of kula lands and the intense use of the land for sugar cultivation in Hanamā'ulu may explain the absence of traditional Hawaiian resources. The pattern of plantation land use, i.e., generally plowing and tilling the soil to at least 36-42 inches, rock removal, etc. destroyed any evidence of pre-contact land use.

The archaeological work surmised that based upon historic documentation and mo'olelo, that during traditional times, the mauka trails to Wailuā which is rich in cultural resources and sites, may have bypassed this area because of the stench from the heiau, Ka-lau-o-ka-manu on Kalepa Ridge (Manu Kapu) which may have been used for human sacrifice. Or perhaps because Kapaia is much further mauka from the low fertile makai lands. It should be also noted that mā'alo means to bypass, so perhaps people used Mā'alo Road to bypass this area. However, it is more likely that with over 150 years of continuous sugarcane cultivation, which may have impacted access by native Hawaiians, that there is at this time, no documentation or evidence of valued cultural and natural resources in the area. Further, the cultural consultations also consistently affirmed that there are no trails, paths, gathering of resources, or burials within the project area.

In 1960, Līhu'e Plantation transitioned hauling cane from railroad cars to big trucks on the cane haul road. With the use of the Cane Haul Roads, the plantation workers, from the ditch workers, irrigators, to the sugarcane workers left the plantation camps to purchase homes and cars in the towns which provided them access to educational, economic, recreational, and political opportunities that were not available within the plantation camps. The surrounding adjacent lands to this project area reflects the neighborhood housing. Now it is ideal for a new church and facilities to be located here too.

In addition to the Cane Haul Roads, there are several historic operating plantation ditches and culverts that are still in existence and being maintained and used by Grove Farm and their leased tenants for agricultural purposes. These features are over fifty years old and are examples of the historic plantation era. None of these features are in the project area. In this case, we could not identify any valued cultural or natural resources within the proposed project area.

The Ka Pa'akai Analysis has not identified any traditional and customary Native Hawaiian rights or practices that would be impaired by the proposed action.

Closing

Cultural impacts upon Native Hawaiian people, customary practices and religious beliefs have infiltrated the history of Hawai'i Nei for more than 200 years since the arrival of Captain James Cook in 1778. Within a period of 40

short years, the Kapu system was abolished by Kamehameha II - Alexander Liholiho and the Queen Regent, Ka'ahumanu bringing an end to the strength of the closely-knit Hawaiian religion and political system of Hawai'i. With the arrival of Calvinist missionaries in 1820 came a new god and religion which leveraged the beginnings of severing the native Hawaiians' veneration of the natural world.

By the 1890s, subsistence lifestyles, agriculture and rural communalism had entirely been replaced by commercialism, urbanization, and individualism as key features of life in the Hawaiian Islands. Foreign sugar plantation moguls usurped control of Hawai'i's prime agricultural lands and fresh water sources to sustain their crops. Miles and miles of irrigation ditches were engineered to redirect the natural flow of water out of the ahupua`a; forever changing the balance of environments and lifestyles of generations of native Hawaiian families.

This analysis does not foresee potential impacts of the proposed proposed land use on Native Hawaiian cultural practices customarily and traditionally exercised for subsistence, cultural or religious purposes.

APPENDIX A

Notification



Consulting Archaeology – Land Use Planning – Construction – Project Management
3-2600 Kaumuali'i Hwy 1300 - #306 LĪHU'E, KAUA'I, HAWAII 96766
CELL: (808) 639-6695: Email: explorationassociates@outlook.com

E Welina mai,

The Ka Pa'akai Analysis remains open for cultural consultation regarding the consolidation and re-subdivision located at Ma'alo Road in the Hanama'ulu Ahupua'a, Puna Moku, Kaua'i [TMK: 3-8-018:001 and 009]. The landowner is proposing a consolidation of two (2) lots and re-subdividing under Kaua'i County Planning Department Subdivision Application S-2027-1.

As represented, the purpose of the proposed subdivision is to facilitate the conveyance of proposed Lot 2, located on the eastern side of Ma'alo Road and containing approximately 1,076 acres, to the State of Hawai'i, Agribusiness Development Corporation (ADC). Since the proposal is being requested by a government agency, the subdivision is exempt from the "one-time" subdivision restriction involving agriculture-zoned lands, pursuant to Section 8-8.3(c) of the Comprehensive Zoning Ordinance. The proposed project will result in three (3) lots, totaling approximately 6,079.03 acres intended for continued agricultural use. This subdivision is intended for mapping purposes only. There will be no development associated with this subdivision application.

The purpose of the Ka Pa'akai Analysis is to identify, document, and assess potential impacts of the proposed subdivision on Native Hawaiian traditional and customary rights and practices.

Explorations Associates Ltd. would like to invite individuals and families familiar with cultural, historical, and traditional practices within the Hanama'ulu Ahupua'a, including:

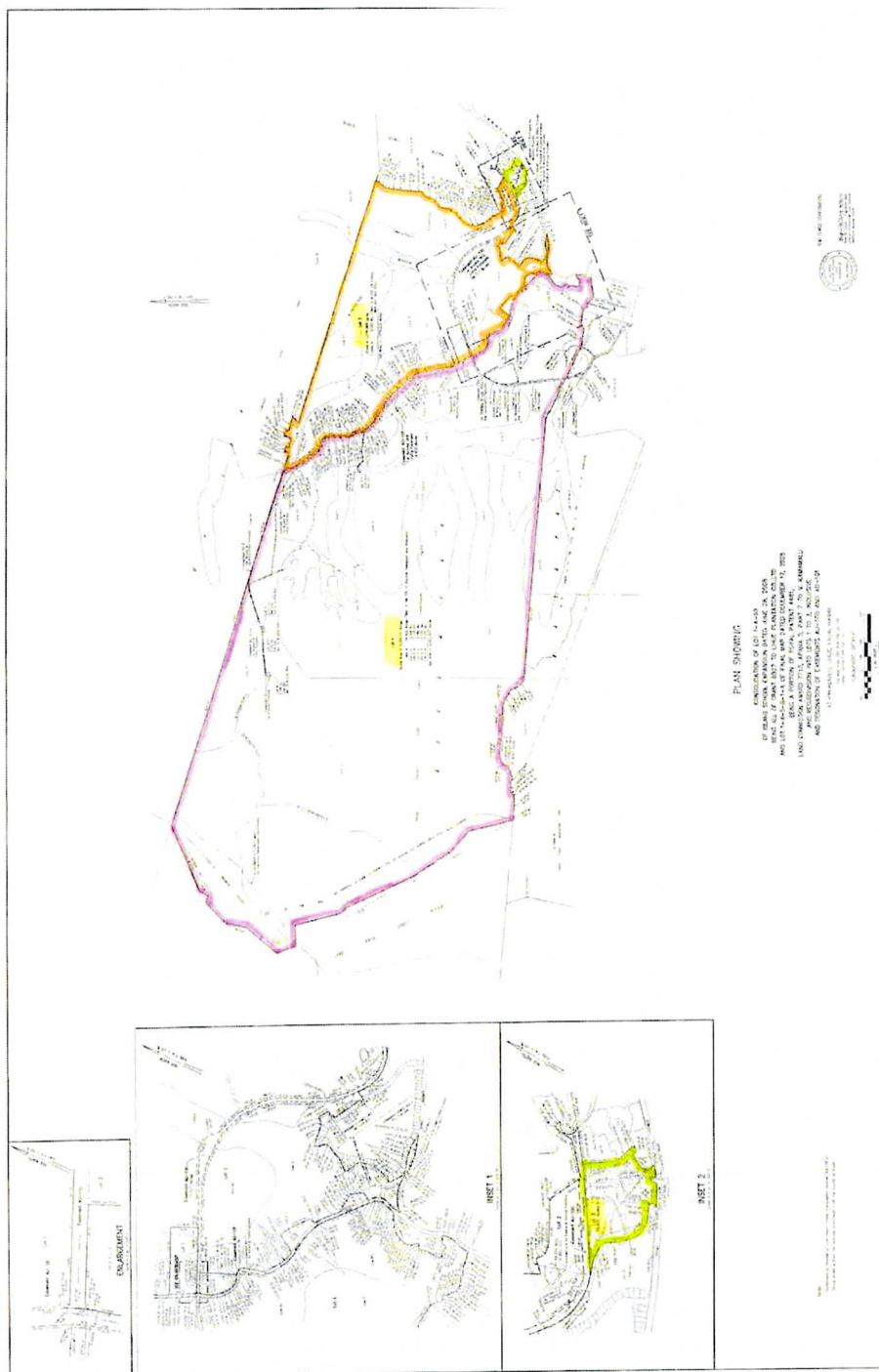
- Cultural associations, mo'olelo (stories), historic maps, and archaeological/cultural resource reports;
- Past and present Native Hawaiian land use or traditional gathering practices;
- Preservation and protection of cultural, historical, and natural resources;
- Known trails, access routes, sensitive areas, historic sites, cultural sites (including burials), and LCAs;
- Native Hawaiian descendants who have traditionally fished, hunted, or gathered within the project area;
- Individuals able to refer to other knowledgeable cultural practitioners or descendants.

Enclosed in this letter is a of interview questions and a project area map. Those interested in providing cultural knowledge, historical information, or consultation regarding this Ka Pa'akai Analysis are invited to contact Leialoha Sanchez at Phone: 808-977-2127 or Email: community@leialohaliving.com by August 26, 2026.

Very truly yours,

Nancy McMahon

Nancy McMahon



APPENDIX B

Correspondence Log

Contact Date / Time	Contact Method	Response	Title/Position	First Name	Last Name
8/19/2026 8/25/2026	In-Person In Person at his residence	8/25/2026 Interview Conducted	Chair/Koloa	Lewellyn "Billy"	Kaohelaulii
8/20/2026	Phone	Awaiting Reply	Familial Connection- 'Ohana Shanks	Jamie	Olivas-Shanks
8/19/2026	Phone	Interview Scheduled for 8/26/2026 @ 10am	Familial Connection	Kurt	Souza
8/21/2026	Email	No Response	Resident/ Lineal Descendant	Kanani	Kagawa (Fu)
8/21/2026	Phone Email	No Response	Kaua'i Resident / Lineal Descendant	Sherrie	Cummings (Pia)
8/21/2026	Email	No Response	Lineal Descendant	Pat	Kahawaioloaa
8/24/2026	Phone (VM Recorded)	No Response	Grove Farm Lessee/ Familial Connection	Russel	Fu
8/24/2026 8/24/2026	Phone (VM Recorded) Text	No Response	Familial Connection	Ryan	Fu

DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR

JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

TRANSMITTAL OF AGENCY COMMENTS TO PLANNING COMMISSION

DATE: **September 2, 2026**

PERMIT NUMBER(S): **S-2027-1**

APPLICANT(S): **Grove Farm Company, Inc. / State of Hawai'i – Agribusiness Development Corporation**

Attached for the Planning Commission's reference are agency comments for the permit referenced above.



County of Kauai
Planning Department
4444 Rice St., Suite A473 Lihue, HI 96766
(808) 241-4050

AUG 28 '26 AM 9:08
PLANNING DEPT

FROM: Kaaina S. Hull, Director

Planner: Kenneth Estes

7/13/2026

SUBJECT: Subdivision S-2027-1

Tax Map Key: 3-8-018;001 & 009

Applicant: Grove Farm Company, Inc./Agribusiness Development Corporation (ADC)

Consolidation of Lot 1-A-10 of Island School Expansion dated June 28, 2008, and Lot 1-A-5-B-1-A of Final Map dated December 17, 2025 and Resubdivision in to Lots 1 to 3, Inclusive and Designation of Easement AU-100 and AU-101.

TO:

- | | |
|--|--|
| ☒ State Department of Transportation - STP | ☒ County DPW - Engineering |
| ☒ State DOT - Highways, Kauai (info only) | ☒ County DPW - Wastewater |
| ☐ State DOT - Airports, Kauai (info only) | ☐ County DPW - Building |
| ☐ State DOT - Harbors, Kauai (info only) | ☐ County DPW - Solid Waste |
| ☒ State Department of Health | ☐ County Department of Parks & Recreation |
| ☐ State Department of Agriculture | ☒ County Fire Department |
| ☐ State Office of Planning | ☒ County Housing Agency |
| ☐ State Dept. of Bus. & Econ. Dev. Tourism | ☐ County Economic Development |
| ☐ State Land Use Commission | ☒ County Water Department |
| ☐ State Historic Preservation Division | ☐ County Civil Defense |
| ☐ State DLNR - Land Management | ☒ County Transportation Agency |
| ☐ State DLNR - Forestry & Wildlife | ☐ KHPRC |
| ☐ State DLNR - Aquatic Resources | ☒ U.S. Postal Department |
| ☐ State DLNR - Conservation & Coastal Lands | ☐ UH Sea Grant |
| ☒ State DLNR - Commission on Water Resource Management | |
| ☒ Office of Hawaiian Affairs | ☐ Other: |

FOR YOUR COMMENTS (pertaining to your department) (Due Date 8/12/2026)

8.25.2026

CTA HAS NO FURTHER COMMENT ON THIS PROJECT.

THANKS.

DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR

JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

TRANSMITTAL OF PUBLIC TESTIMONY TO PLANNING COMMISSION

DATE: **September 2, 2026**

PERMIT NUMBER(S): **S-2027-1**

APPLICANT(S): **Grove Farm Company, Inc. / State of Hawai'i – Agribusiness Development Corporation**

Attached for the Planning Commission's reference are agency comments for the permit referenced above.

F.I.O.4.
SEP 08 2026

Kenneth Estes

From: Planning Department
Sent: Monday, August 31, 2026 6:41 AM
To: Kenneth Estes
Subject: FW: Written Testimony - Subdivision Application No. S-2027-1
Attachments: KCA_Testimony_S-2027-1_Grove_Farm.docx

From: waylon brun <president@kauaicattlemen.org>
Sent: Saturday, August 29, 2026 12:55 AM
To: Planning Department <planningdepartment@kauai.gov>
Subject: Written Testimony - Subdivision Application No. S-2027-1

CAUTION: This email originated from outside the County of Kauai. Do not click links or open attachments even if the sender is known to you unless it is something you were expecting.

Aloha,

Please find attached written testimony from the Kaua'i Cattlemen's Association regarding Subdivision Application No. S-2027-1 (Grove Farm Company, Inc. / State of Hawai'i - Agribusiness Development Corporation, Proposed Consolidation and Re-Subdivision, TMKs: (4) 3-8-018:001 and 009).

Please let me know if you need anything further.

Mahalo,
Waylon Brun
President, Kaua'i Cattlemen's Association



KAUAI CATTLEMEN'S ASSOCIATION

Representing Kaua'i's Ranching and Cattle Industry

August 27, 2026

Planning Commission
c/o County of Kaua'i Planning Department
4444 Rice Street, Suite A473
Līhu'e, HI 96766
Phone: (808) 241-4050
Email: planningdepartment@kauai.gov

Attn: Mr. Kenneth Estes, Planning Department, and Planning Commissioners

SUBJECT: Letter of Support - Subdivision Application No. S-2027-1, Grove Farm Company, Inc. / State of Hawai'i - Agribusiness Development Corporation, Proposed Consolidation and Re-Subdivision, TMKs: (4) 3-8-018:001 and 009

Dear Mr. Estes and Members of the Planning Commission,

My name is Waylon Brun, and I serve as President of the Kaua'i Cattlemen's Association (KCA). I am submitting this written testimony on behalf of KCA and our membership regarding the above agenda item, Subdivision Application No. S-2027-1, the proposed consolidation and re-subdivision of TMKs (4) 3-8-018:001 and 009.

KCA supports this subdivision application. We understand this consolidation and re-subdivision is a necessary step to enable the conveyance of approximately 1,000 acres of Grove Farm land in Kapaia to the Agribusiness Development Corporation (ADC), keeping this land in productive, long-term agricultural use for the benefit of Kaua'i's farming and ranching community.

Secure, long-term access to agricultural land is one of the greatest constraints facing Kaua'i's cattle ranchers, and we are grateful to see Grove Farm and ADC working together to keep this land in agriculture. We respectfully urge the Commission to approve this application without delay so this transaction can move forward.

Please don't hesitate to contact us if it would help to have our Association's input at any stage of this process.

Mahalo for your consideration.

Sincerely,

Waylon Brun
President, Kaua'i Cattlemen's Association