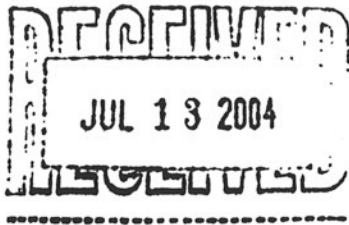


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LINDA LINGLE
GOVERNOR OF HAWAII



**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

HISTORIC PRESERVATION DIVISION
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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

June 21, 2004

Mr. David Shideler
Cultural Surveys Hawaii
733 N. Kalaheo Avenue
Kailua, HI 96734

LOG NO: 2004.1860
DOC NO: 0406NM12

Dear Mr. Shideler:

**SUBJECT: National Historic Preservation Act, Section 106 Compliance – Review Comments on an Archaeological Assessment for Alternative Routes for Proposed the Lydgate Park -Kapa'a Bike & Pedestrian Path
Lihue and Kapa'a District, Kauai Island**

Thank you for submitting the subject report (Hammatt and Shidler, 2004, *Archaeological Assessment of Alternative Routes Proposed for the Lydgate to Kapa'a Bike and Pedestrian Pathway Project Within the ahupua'a of Wailua, South Olohena, North Olohena, Waipouli and Kapa'a, Island of Kauai*, CSH, ms.), which we received on June 2, 2004. The report has been prepared in support of the proposed Kapa'a Bike and Pedestrian Path, a Federal undertaking funded in part by the Federal Highways Administration.

Comments on the Assessment

The background section and the boundary information were very informative and well written. Three new sites (grinding stones, WW II bunker and railroad berm) were identified in addition to the previously identified historic properties, for a total of 18 historic sites (*heiau*, cultural deposits and human burials) within or near the proposed routes. On page 83, you note that site is northwest of Kukui Heiau but according to the map, page 84, it is southwest. We recommend that this minor issue be clarified and that the assessment be corrected, if necessary.

Comments on Proposed Alignments

The coastal trail has the most potential to have an "adverse effect" on historic sites listed on or eligible for listing on the National Register of Historic Places. To the extent possible, we would recommend complete avoidance of these sites. It is also possible that, in some locations, an adverse effect may be mitigated through archaeological monitoring of ground-disturbing activities associated with the proposed path that may adversely affect cultural deposits and inadvertent burials, where subsurface construction would take place in sandy subsoils. In any case, we strongly recommend that the pathways need to be around heiau sites with substantial buffer zones established - ideally 200 feet on all sides of these sacred sites. In

Mr. David Shideler
Page 2

addition, as noted above, it is possible that human burials may be encountered during ground-disturbing activities. In this event, a burial treatment plan will need to be submitted to the Kauai/Niihau Island Burial Council for the treatment of burials to be preserved in place and to ensure proper treatment of any further burials inadvertently discovered during monitoring work.

In addition, the community has a working group under the County Council for this bikeway plan, and they want to see interpretive signage along the path. A preservation/interpretive plan appears to be needed, to include interpretive signage and buffers around historic sites that are being preserved. By working with the Community group, Kaua'i Historic Preservation Review Commission, our office, other consulting parties, and members of the public, a preservation and interpretive plan can be designed, approved and implemented.

Once a final alignment has been selected, a Memorandum of Agreement (MOA) will need to be worked out for these concerns. The MOA should include stipulations that address the foregoing concerns, including preservation and interpretation of known historic sites, an archaeological monitoring plan, and a preservation plan. Any mitigation plans developed should be submitted for review to the State Historic Preservation Division for this work.

Should you have any questions about archaeology, please call Nancy McMahon at 742-7033. If you have questions about burial matters, please call Kanai Kapeliela at 692-8037.

Sincerely,



Peter T. Young
State Historic Preservation Officer

NM: sky

C: Ian Costa, Planning Department, County of Kaua'i
Doug Haigh, Public Works, County of Kaua'i
Chair, Kaua'i/Niihau Islands Burial Council
Chair, Kaua'i Historic Preservation Review Commission
Kana'i Kapeliela, Burial Sites Program
Glenn Kimura, Kimura International
Pat Phung, Federal Highways Administration
Dan Quinn, Administrator, State Parks [ATTN: Martha Yent]