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GOVERNOR OF HAWAII



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DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707

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April 21, 2010

Hallett H. Hammatt, Ph. D.  
Cultural Surveys Hawai'i, Inc.  
P.O. Box 1114  
Kailua, Hawaii 96734

LOG NO: 2010.0723  
DOC NO: 1004NM62  
Archaeology

Dear Dr. Hammatt:

**Subject: Chapter 6E-42 Historic Preservation Review -  
Revised Draft Archaeological Inventory Survey Report for a Nawiliwili- Ahukini  
Bike Path Nawiliwili/Kalapaki/Hanamaulu Ahupua'a, Lihue District, Kaua'i  
TMK: (4) 3-5-001: 004, 8, 27, 60, 83, 85, 102, 118, 128, 159 and 160 por.**

Thank you for submitting the subject report entitled *Revised Draft Archaeological Inventory Survey Report for the Nawiliwili- Ahukini Bike Path, Nawiliwili, Kalapaki, and Hanamaulu Ahupua'a, Lihue District, Kaua'i Island, TMK [4] 3-5-001: 004, 8 27, 60, 83, 102, 118, 128, 159 and 160 por* (Altizer and Hammatt, March 2010). The report was received March 19, 2010. This report covers a single project area of approximately 6 miles. The field work took 29 days to complete.

The report states that the survey identified 15 historic properties. Two of the sites were previously recorded (422- agricultural wall and 423 agricultural wall), and twelve are newly identified (Sites 2086 and 2094 – precontact habitation site, 2087 –Nawiliwili Harbor Light House and associated features, 2088- historic communication tower, 2089 possible burial mound, 2090 – military gun emplacement, 2091 and 2092 related to historic residences, 2093- plantation era earthen drainage ditch, 2095 precontact activity area, 2096 and 2097- drainage ditches, 2103 – remnants of historic industrial complex). A test unit was excavated in site 2095 which yielded a radiocarbon date AD 1390-1440 for the Hawaiian pre-contact period.

UTM or GPS coordinates should be submitted for all sites in the site listing information.

**Methods:** The APE was surface surveyed 100%.

**Consultation:** This section has now been added and is clear that consultation did take place.

**Significance Evaluations:** Six sites were found not be significant historic properties and no further work is recommended. Page v states 4 sites are recommended for no further work. Nine sites have been determined to be eligible for the Hawaii Register of Historic Places and are significant and eligible for the Hawaii Register of Historic Places. In the abstract page iv there is still an error on the number of sites eligible for the state register, at the top of the page it state 9 and then in the last block it states 8 sites. The table below (taken from page 141-142 of your report) lists the site number, age, type, function, their significance criteria, and proposed mitigation:

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Based on this information, we do not see the need to have archaeological monitor and disagree with your recommendation regarding monitoring.

There are a number of inconsistencies in various sections of this report which we have pointed out in this review that need to be corrected. In addition, please omit the correction about archaeological monitoring.

Please submit the above corrections and mark the report final so that it can be approved. Contact me at (808) 692-8015 if you have any questions or wish to further discuss comments made in this letter.

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon". The signature is written in black ink and is positioned below the word "Aloha,".

Nancy McMahon, Deputy SHPO/State Archaeologist  
and Historic Preservation Manager  
Historic Preservation Division