PLANNING COMMISSION

KAAINA S. HULL, CLERK OF COMMISSION

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THE COUNTY CLERK
COUNTY OF KAUA'I

GLENDA NOGAMI STREUFERT, CHAIR
HELEN COX, VICE CHAIR
DAN GIOVANNI, MEMBER

- **The Planning Commission Meeting will be at:**

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

- **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.

SUBDIVISION COMMITTEE MEETING NOTICE AND AGENDA
Tuesday, October 13, 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 OCT -7 P3:09
OFFICE OF
THE COUNTY CLERK
COUNTY OF KAUA'I

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
2. August 11, 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.
5. Supplement #2 to Subdivision Report.

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**

KAUA`I PLANNING COMMISSION
SUBDIVISION COMMITTEE MEETING
August 11, 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 8:03 a.m. - Webcast Link: https://www.kauai.gov/Webcast-Meetings

The following Commissioners were present:

Mr. Dan Giovanni
Ms. Glenda Nogami Streufert

Excused or Absent
Ms. Helen Cox

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 Planning Commission Subdivision meeting is called to order at 8:03.

ROLL CALL

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

Commissioner Dan Giovanni: Here.

Mr. Hull: Chair Streufert?

Chair Streufert: Here.

Mr. Hull: You have a quorum, Madam Chair. 2:0.

APPROVAL OF AGENDA

Mr. Hull: Next, would be the Approval of the Agenda. The department has no recommended changes to the agenda.

Chair Streufert: Do we have to take a vote on this?

D.2.
OCT 13, 2026

Mr. Hull: A voice vote is fine.

Chair Streufert: All right, let's have a voice vote that we accept the agenda.

Deputy County Attorney Laura Barzilai: You need a motion first, Chair.

Mr. Giovanni: Can I move first?

Chair Streufert: Yes. I'm sorry.

Mr. Giovanni: I move we accept the agenda as presented.

Chair Streufert: Second.

Ms. Barzilai: All in favor.

Chair Streufert: It's moved and seconded. A voice vote. All those in favor? Aye (unanimous voice vote). All right. 2:0.

MINUTES of the meeting(s) of the Subdivision Committee

June 09, 2026

Mr. Hull: Next, we have minutes for the June 9th, 2026, Subdivision Committee meeting.

Chair Streufert: Do we have a motion to approve the minutes?

Mr. Giovanni: I approve the minutes. I move that we approve the minutes.

Chair Streufert: Second. It's been moved and seconded. Therefore, let's have a voice vote. Do we accept the minutes from the last meeting? Aye (unanimous voice vote). Approved. 2:0.

RECEIPT OF ITEMS FOR THE RECORD (None)

UNFINISHED BUSINESS (None)

NEW BUSINESS (For Action)

Mr. Hull: Next, there are no specific Receipt of Items for the Record, before the agenda was posted. However, subsequent to agenda being posted, some testimony was submitted that has been circulated and is part of the public record online and is available for review. So, with that, moving on to New Business, we have G1.

Preliminary Subdivision Map Approval

Subdivision Application No. S-2026-13
Richard A. Littlestone Jr./ Toni S. Uchima
Proposed 2-Lot Subdivision
TMK: (4) 2-4-001: 044

Kalaheo, Kaua'i

1) Subdivision Report pertaining to this matter.

Mr. Hull: We don't have any members of the public signed up to testify on this item. However, if there are...

Chair Streufert: There's a hand going up in the back there.

Mr. Hull: …if there is someone that wants to testify on this item, please approach the microphone. If you can state your name and you have three minutes for testimony.

Ms. Kanani Kagawa: Hi. Good morning.

Chair Streufert: Good morning.

Ms. Kagawa: Kanani Kagawa, for the record, I'm going to be testifying today on all subdivisions that are in the packet. And just as a matter of housekeeping, I was not, and if it is, you could clarify, I did not see the Ka Pa'akai analysis on these subdivisions that are in the packets, that are (inaudible) in today's subdivision committees. And if they are, excuse my ignorance, I did not see them. And it was just a clarification whether the Planning Department is requiring them for Preliminary Subdivision approval. As I was made aware that some subdivision applications, when applicants submit subdivision applications, they are being requested or required to submit a Ka Pa'akai analysis with the application in order to be accepted, the subdivision applications, in order for the applications to be accepted by the department. So, with this particular agenda, subdivision application within the subdivision packet, a Ka Pa'akai analysis was not attached to that. So, I just wanted to put that for the record, if the department is requiring this subdivision application to undergo an Ka Pa'akai analysis and subsequently all other agenda items today within the subdivision committee, and that will be my generalized testimony for all agenda items today. So, I'll be speaking on each item today within this Subdivision Committee for that.

Chair Streufert: Do you have any questions?

Ms. Kagawa: Thank you.

Mr. Hull: If there's any questions, commissioners have on the testimony, although it's just testimony at this point.

Ms. Kagawa: Yeah, it's become a standard practice within the department. So, I was just wondering if that is something we are doing as this particular parcel is surrounded with area that could be potentially or have potential impact for cultural practices.

Ms. Barzilai: We're going on three minutes right now. Are you, are you complete with your testimony?

Ms. Kagawa: Thank you. Yeah.

Ms. Barzilai: Okay. So, does somebody want to discuss that specifically for this application or do we want to move on?

Mr. Giovanni: I'd like (inaudible) general, so I would…yeah, if I could get this clarification process wise, on subdivision applications, what is the department's protocol for consideration or requiring of Ka Pa'akai?

Ms. Barzilai: Any one of us can speak to that, maybe starting with Ka'aina.

Mr. Hull: Well, I can speak as it's an agenda item. I can speak to the specifics of the agenda item.

Ms. Barzilai: Of this particular…

Mr. Hull: If the commission would like a briefing on the overall Ka Pa'akai analysis, that would be a separate agenda item.

Mr. Giovanni: (Inaudible) to just subdivision applications.

Mr. Hull: Yeah, that would be agendized in particular.

Ms. Barzilai: We can, we can do it as an educational presentation, but we can discuss application by application, how the department concluded, either yes or no.

Mr. Giovanni: Whatever…

Ms. Barzilai: So, since we're on this agenda item, should we address it?

Mr. Giovanni: Yeah, let's address it for this agenda item if that is possible.

Mr. Hull: So, what has been posited as the Ka Pa'akai analysis as required under the State Constitution, is an analysis to be made on whether or not cultural impacts, cultural practices are occurring on the property, the proposed application would impact, and in what manner can that impact be mitigated. And so, that analysis is required for all applications for subdivision. Now, what we've also seen is that there are some levels of Ka Pa'akai analysis, where it will be a full blown submittal and packaged item. And some, where it's not as robust, if you will, in order to make sure that the constitution standards are met, an analysis is made, however, to the degree of what an applicant hires a consultant and conducts that analysis, may vary. It's ultimately, at the end of the day, up to the commission on whether or not it meets their due diligence in reviewing it. So, you know, for this one, I guess I would ask if the speaker has any specific cultural claims to this and if there are cultural claims to this property and there are impacts within the proposal that are going to impact it, then indeed we need to…you as a body, need to take that into account and consideration upon reviewing this application.

Ms. Barzilai: I'd also like to add that if we're talking about this residential area where I believe there's already a structure, then…

Chair Streufert: Wait, I think we're still on application S-2026-13.

Ms. Barzilai: Yes. Littlestone.

Chair Streufert: Right.

Ms. Barzilai: And I believe that there's a structure on the, on the property already. So, then the legal analysis is developed versus undeveloped.

Mr. Hull: I apologize; I forgot that part.

Ms. Barzilai: This is, this is a question that maybe for future education or briefing, we could get more deeply into, but I think that case by case, starting with Littlestone, we can talk about whether or not the department has deemed this as developed, in which case a Ka Pa'akai would not be required.

Mr. Hull: Sorry, I forgot that last element.

Mr. Giovanni: Just summarize that last part. So, in the case of a specific application…

Chair Streufert: Yes.

Mr. Giovanni: …where there are existing vertical buildings…

Chair Streufert: Yes.

Mr. Giovanni: …the department has concluded that a subsequent Ka Pa'akai is not needed.

Mr. Hull: Under the state. Sorry, I forgot, under the case law ruling is that a less than fully developed parcel requires the Ka Pa'akai, absent that of developed parcel, does not require Ka Pa'akai analysis.

Mr. Giovanni: Okay.

Mr. Hull: Certainly, an analysis on whether or not impacts will be made to the greater area should be made on use permit applications that have a compatibility threshold, but if there is a developed parcel, then indeed case law has that standard within it.

Chair Streufert: And in this particular. In this particular case, it is a fully developed…

Ms. Barzilai: The size. I'm sorry, I think Kenny would be most knowledgeable in that, but it looks like the size, and the use of this property would indicate that it's developed. If you want to ask questions of the department.

Mr. Hull: And I also know that we're still in the public testimony portion of this. So, you may want to…

Ms. Barzilai: Yes.

Chair Streufert: Got it.

Ms. Barzilai: Well, we'll wait for action.

Chair Streufert: Are there any, is there any other person who would like to offer public testimony on this.

Ms. Kagawa: So, the question was asked whether or not the testifier had cultural concerns. So, generally speaking, kānaka you wouldn't have known had not consultation occurred for the parcel or the area. So, regardless if development already existed, and this is just generalizing and course of practice for the department in their future reports of residential subdivisions, or if development exists, they should reason within the report why a Ka Pa'akai analysis is not being rendered or required. If we were picking and choosing which residential developments are requiring it, when I, it's understood that some residential developments for kama'āina families are being required to do Ka Pa'akai analysis. It's the truth. I've been approached by many families that I have to conduct studies and others are not. And the areas seem...the areas don't seem to have cultural practice. So, we tend to think, oh, there's no cultural practices, right, from the standpoint of the Planning Department, it's not known if there is practices or not, unless you do the due diligence of it. And that's just the question to be asked that I'll ask on all the applications. Where did the decision come from to not require the analysis on the subdivision application for these applications, especially in the upcoming agenda items where cultural sensitive areas are taking place. So, thank you.

Mr. Giovanni: I'd like to comment on that last. I tend to agree with you that it would just for purposes of clarity, that if a specific subdivision request is put forward, the department deems that for whatever reason, a Ka Pa'akai or a supplemental Ka Pa'akai is not necessary. It should be clear, at least stated in the, in the department's recommendation to that effect one way or the other. I think that's legitimate.

Chair Streufert: I have a question for the...

Mr. Hull: Again, I think we're still on the public testimony section.

Chair Streufert: Oh, okay.

Mr. Hull: So, I think we want to resolve the public testimony, if there's any other testifiers.

Ms. Barzilai: And then we can open it up to debate.

Chair Streufert: Is there anyone else who would testify on this? We're on the application, S-2026-13.

Mr. Hull: Seeing none, I'll turn it over to Kenny for the report on this agenda item.

Staff Planner Kenny Estes: I'll give a brief summary of the subdivision application.

> 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: Any questions for the department? I do have a question on that. This particular lot is right above Kaumuali'i, and it's very steep going down into the Kaumuali'i Highway. Is there anything that would...are there any requirements against erosion or erosion control or sediment control before anything can be built on it? They're not proposing anything right now, but when does that kick in?

Mr. Estes: Any grading or ground (inaudible) to bring activities would be likely handled through the county's clearinghouse review process, which is facilitated by the Department of Public Works, Engineering Division. And at that time, the engineering division would implement their sediment and erosion control ordinance (inaudible).

Chair Streufert: So, that's under the building department?

Mr. Estes: Department of Public Works, Engineering.

Chair Streufert: Any other questions?

Mr. Giovanni: Yeah. Just to follow up on the Ka Pa'akai, so based on the prior comments made during the public testimony phase, is it fair to conclude that you have reviewed and concluded that a Ka Pa'akai is not required for this consideration?

Mr. Estes: In reviewing the subdivision application at the time of submittal and reviewing the subject property, it was noted that there was a single family dwelling unit on the property, and so at that time a Ka Pa'akai analysis wasn't required at the time of subdivision application.

Mr. Giovanni: Thank you.

Chair Streufert: Would that then constitute fully developed?

Mr. Hull: Guidance as suggested, yes. However. Oh sorry, guidance as, guidance as suggested, yes. However, it is an area that the court in their ruling did not specify.

Chair Streufert: Okay. Is the applicant here?

Ms. Maren Arismendez: Good morning. Maren Arismendez from Esaki Surveying, here on behalf of the owner. We would like to respectfully request tentative approval and here to answer any questions from the commissioners.

Chair Streufert: Are there any questions for the applicant?

Mr. Giovanni: No.

Chair Streufert: How long has the, there is a residence on this property. How long ago was that residence built?

Ms. Arismendez: From Kenny's briefing, I think I heard 1985. So, that would be…

Mr. Estes: Sorry, 1995, per the county…

Ms. Arismendez: Oh, 1995.

Mr. Estes: Yeah, the county real property assessment records.

Chair Streufert: So, it's 30 years, it's been there.

Mr. Estes: Correct.

Ms. Arismendez: 40.

Chair Streufert: I'm sorry.

Ms. Arismendez: 40 (inaudible).

Chair Streufert: 85 or 95?

Ms. Arismendez: 85.

Chair Streufert: Oh, I heard 95. I'm sorry.

Ms. Arismendez: Oh, okay.

Chair Streufert: Good to correct if I had any (inaudible).

Ms. Arismendez: Sorry. Engineer numbers.

Chair Streufert: If there are no other questions, are we ready for motion?

Mr. Giovanni: Yes. I move that application number S-2026-13 be approved.

Chair Streufert: Second. It's been, the motion has been made and it's been seconded. Just one comment before we take a vote and that is that, I think I'm satisfied that the department has done or has looked at a Ka Pa'akai analysis for the requirement for it, and based upon their determination that it's not required because it is fully developed, I think I would go with the department's standards. That being said, let's have a roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Commissioner Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0.

Ms. Arismendez: Thank you.

Mr. Hull: Next, we have up

Subdivision Application No. S-2026-15
Kiahuna Phase Ill-A & 111-B / County of Kaua'i
Proposed 2-Lot Subdivision
TMK: (4) 2-8-014: 018
Koloa, Kaua'i

1) Subdivision Report pertaining to this matter.

Mr. Hull: We don't have any members of the public to testify. However, I believe we have at least one member that would like to testify.

Chair Streufert: Please state your name.

Ms. Kagawa: Morning. Kanani Kagawa, for the record. It's the same comment as the previous testimony to determine how the Ka Pa'akai analysis wasn't warranted. You guys have two subdivisions before you for this issue. I recognize it is just for an easement matter. However, that area, that roundabout that's being proposed, if we are all aware, had significant cultural matters for the community. So, what is the subdivision purpose of what will be then developed and its impact of the purpose of the subdivision should be then consulted. So, that is what I would like to testify on. And again, in reading the report, it is absent of a Ka Pa'akai analysis, and the report did not determine whether or not or the reasoning as to why the report was absent. Some, again, you know, in the Kōloa, Po'ipū area, I'm aware that some projects are required to submit and some aren't, and this one wasn't. Thank you.

Chair Streufert: Are there any other persons who would like to testify on this?

Mr. Hull: Seeing none, I'll turn it over to Kenny for the report on this matter.

> 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: Any questions for the department?

Mr. Giovanni: Yeah. Did the, did you conclude that a Ka Pa'akai was not necessary due to development that has already occurred on the subject property?

Mr. Estes: Correct.

Chair Streufert: What exactly is on this property right now?

Mr. Estes: I think it's the Kiahuna Plantation Resort, so…

Chair Streufert: Any other discussion? Open for a motion.

Mr. Giovanni: I move application S-2026-15 be approved.

Chair Streufert: Second. It's been moved and seconded. Is there any discussion before we move for the motion or move for approval? Can we have a roll call please?

Mr. Hull: Commissioner Giovanni?

Mr. Giovanni: Aye.

Mr. Hull: Commissioner Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0. Sorry, next on the agenda item is G.1.c.

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
Hanama'ulu, Lihu'e, Kaua'i

1) Subdivision Report pertaining to this matter.

Mr. Hull: We don't have anybody signed up, but I believe we have someone that wants to testify on agenda items. If you could approach the microphone. Anybody that's from the public that would like to testify on this agenda item, please approach the microphone.

Ms. Kagawa: Good morning. Kanani Kagawa, for the record…

Mr. Hull: Kanani.

Ms. Kagawa: Oh, thanks Ka'aina. Good morning. Kanani Kagawa, for the record. Pertaining to this subdivision agenda item, I'm asking the commission to deny the preliminary subdivision request until a Ka Pa'akai analysis is completed for this application, it is absent of one. When you're subdividing 6,000 acres, this project does have cultural and lineal descendant impact. As someone who, history Hanamā'ulu, born on Kaua'i, raised my children there. Cultural and lineal descendancy ties, I can, I would like to be consulted for this project. My children would also be lineal and cultural descendants of this area, who would be consulted for this project. I believe this subdivision would have significant impact to our gathering rights, our traditional cultural practices, and thus, we should be consulted along with other native families for this project. This subdivision is absent or I did not see a Ka Pa'akai analysis. Therefore, I am requesting that the Planning Commission require a subdivision, a Ka Pa'akai analysis, prior to that, if it is, I didn't see it and I would like to…it was absent in the report, so I wanted to be able to have the opportunity in the public report to see it, to look at the recommendations, and therefore we weren't consulted, and usually, in previous projects in Hanamā'ulu, our family is consulted in for these projects. So, I just wanted to talk about and see to have that opportunity to look at it in for this area. That was my only question, concern, comment about it to add to it. Thank you.

Mr. Hull: Are there any questions? If not, we can call for other testimony.

Chair Streufert: Right. My…I'll hold off my questions until later.

Mr. Hull: Is there any other members of the public that would like to testify on the agenda item? One more.

Ms. Sherri Cumings: Aloha, commissioners, Ka'aina. Sherri Cummings for the record, lineal descendant of Wāhinealohakeo, who was konohiki of the puna moku. We still have family lands today in Hanamā'ulu. I have my tūtū's original commission awards and I have his deeds. Our families was always consulted as well. We was part of FDOT, SDOT my mother's brother, my mother's cousin, Pia family to, to Hanamā'ulu. My tūtū man, I just was explaining to others in the back there, he had, he was, he had a significant kulana to the kuleana of this puna moku, and his expertise stemmed all the way back to as recent as, we had a meeting last week with Hal Hammett them, and they revered my man. I had no idea that they were going to speak on what he did regarding inventory of heiau. He had a series kuleana took place. My grandfather's siblings were all born there. I was born on Mauna Kapu, which is Kalepa. The resources in these areas totally impact the lower lands, which is my family's lands. I had no idea, I just moved back a little while ago and I had kahea families of that place. The Ka Pa'akai analysis, which is lawful, I did not see that as well. As practitioners to place, as my tūtū man, who had expressed authority in how to land manage those areas. My uncles were gatherers. I have my second, third oldest son, who's a gatherer by innate. I'm not a lawai'a, but I know intimately well when I stand on my tūtū's kilo for the i'a. I feel you folks…I don't understand, and I want them to come before us and tell us. When you talk ADC, who is ADC? I know that's Agro Development Corporation, born through a legislative process. First of all, only to talk about the West Side water system and they morphed into something that is so big. And this is about control of resources.

Mr. Hull: Three minutes, Madam Chair.

Ms. Cummings: When they take this resources, they eliminate our opportunity. And we want to be part of this process and want to understand.

Chair Streufert: You've got three minutes. Could you wrap up your testimony?

Ms. Cummings: And I can say unequivocally, without a shadow of a doubt, because we have First American Title guarantees palapala that says, my family did not give interest to the Līhu'e Plantation, which is today, Grove Farm.

Chair Streufert: Thank you for your testimony.

Mr. Hull: Are there any other members of the public would like to testify on this agenda item? If so, you may approach the microphone. I'll turn over to Kenny for the report pertaining to this matter.

Mr. Estes: I'll summarize the report.

> 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).

Mr. Estes: Madam Chair, we have...comments are pending from the Department of Public Works Engineering Division, the Department of Water and the State Department of Health.

Chair Streufert: Kenny, correct me if I'm wrong, but there was a Ka Pa'akai analysis that was done, and I think it's available to the public. Is that correct?

Mr. Estes: Yeah. There was a Ka Pa'akai analysis done for this application. However, it was not transmitted as part of the subdivision report packet to the Planning Commission, but is provided, it was provided to the subdivision committee as well as on the table there for the public.

Mr. Hull: I'll also add that, and we can have a discussion when the applicant comes up. But in looking at the Ka Pa'akai analysis that was submitted, the two testifiers that spoke today with lineal descendancy and connections to this area were not on the consultation list. So, that's going to be…you can have that conversation with the applicant in regards to the analysis that was submitted.

Chair Streufert: Okay. Is the applicant here?

Mr. David Britton: Good morning. My name is David Britton. I represent Grove Farm. I'm here with Casey Watabu, who's the Grove Farm representative today. We're here to respectfully request tentative subdivision approval. And we're happy to answer any questions. We would note that a Ka Pa'akai was done and there was significant community consultation, including with the aha moku representative. So…

Mr. Giovanni: I'm sorry, could you speak up a little louder?

Mr. Britton: I apologize; this thing doesn't come any closer to me.

Mr. Giovanni: Just yell.

Mr. Britton: Just yell. Okay. Yes. So, there was a significant amount of consultation done with the community, including among the people listed, the aha moku representative. So, we believe that appropriate consultation was done. And just so everyone understands, this is a subdivision to create a thousand-acre parcel for the Agribusiness Development Corporation to keep agricultural lands in agriculture and Agribusiness Development Corporation will then lease the property, lease out the lands to individual farmers. So, this is not a development project. This is a project where Grove Farm is trying to maintain agriculture on agricultural lands on Kaua'i.

Chair Streufert: Correct me if I'm wrong. This is a 6,000-acre parcel, 1,000 acres are to be to…or for the ADC.

Mr. Britton: Correct.

Chair Streufert: What's the intent for the other 5,000 acres?

Mr. Britton: Well, the…that's a good question. There's agricultural uses that occur on there. The Hanamā'ulu shops as part of this subdivision. So, we're subdividing out the Hanamā'ulu shops to maintain zoning integrity for the different parcels. Because the parcel is so large now, you have a

variety of different uses that go on. So, portions of the property are in agriculture, portions will remain with the Hanamā'ulu shops and portions of the property are basically just raw land. So, I, Grove Farm has, I'm not sure what the long-term development plan is, but they will continue to manage the property as they have for the last 150 years, so…

Chair Streufert: Just a question to the department, can we consider future development, potential development or are we just looking, we just have to look at what we've got here for our subdivision requests. Is that correct?

Mr. Hull: Okay…if I can clarify a question, when you're talking about the application itself or the Ka Pa'akai analysis?

Chair Streufert: The application itself. So, we're talking about 6,000 acres. 1,000 is going to ADC, there's still 5,000 acres. There's no development plans right now. And we're just looking at the subdividing of the 1,000 acres from 6,000. Is that correct?

Mr. Hull: Correct.

Chair Streufert: Okay. That's what I wanted to have clarification on. And there is a Ka Pa'akai analysis that Kenny has provided. There are Hanamā'ulu residents on this, as well as Kapa'a Residents, and Grove Farm property managers and cultural practitioners.

Mr. Britton: And if I may, the analysis was… the analysis noted that there was no ongoing development and no impact to cultural practices or gathering resources.

Chair Streufert: Is there a water source on this property and is that a spring or is that just a river?

Mr. Britton: There's oh, there's a complex system of water ditches and flumes, and one of the three parcels that's being consolidated and re-subdivided is a historic plantation reservoir that's going to go to Agribusiness Development Corporation. So, water security is part of the plan to make sure that the agricultural lands are able to be sustained in agriculture.

Chair Streufert: But it's not going to be…the reason for asking is one of the Ka Pa'akai analysis points is the utilization of water or the (inaudible) of water. And so, you're saying that there's not going to be any change in what's been going on and so forth?

Mr. Britton: Correct. Yeah.

Chair Streufert: Any other questions?

Mr. Giovanni: Yeah. Can you confirm if the two public testifiers today were or were not in the list of individuals that were consulted?

Mr. Britton: I don't believe they were. I didn't catch their names, but I have the list of people here and if we could…

Chair Streufert: Page 31.

Mr. Giovanni: Yeah, just wanted to for the record, if they were included or not.

Mr. Britton: If you'll bear with me, I can… what were the...I'm sorry, what were the names of the two testifiers?

Chair Streufert: I'm sorry. Do you remember the names?

Mr. Hull: Sherri Cummings and Kanani Kagawa. They're not on the list.

Mr. Britton: They're not on the list. Okay.

Mr. Giovanni: Thank you.

Mr. Britton: Yes.

Mr. Giovanni: So, I take the responsibility as a commissioner for compliance with the requirements for Ka Pa'akai very seriously. That translates to me that by virtue of a report being produced by a qualified consultant to produce the Ka Pa'akai analysis is a very important exercise in the first step, but in and of itself cannot, does not constitute an affirmative adequacy of the of the report itself. That judgment in large part is up to the commission, and for myself having this not being, the report not being transmitted publicly and ahead of time, and only receiving it at the last minute, I don't feel I have had the time to make a determination whether or not it's adequate or not, and I would like the time to do that, so I don't feel comfortable going forward with the decision on this at this time.

Chair Streufert: So, we can either, from that perspective, we can either can we defer it to the end of the meeting or can we to give us some time?

Mr. Giovanni: So, what are our, what are our options?

Chair Streufert: Or to defer it to another time?

Mr. Hull: Yeah, I think there's two questions for you, Commissioner Giovanni, is one, if you're talking about just time to further review it for yourself, that would, you know, potentially allow for a scheduling as early as September, but if there's any part in which you have concerns about the testifiers who spoke not being included.

Mr. Giovanni: No.

Mr. Hull: So, to step back on how the, the Ka Pa'akai process is to unfold with this body is that this body, and ultimately the Planning Commission will be the final authority on the cultural impacts and what mitigation measures are required as part of the application, should it deem an approval. And so, this body can conduct the discussion and proposed mitigating measures with cultural practitioners that come to the hearing as part of its own process, or it can delegate it back to the applicant and state through our process of a public hearing, these cultural practitioners who are not consulted have made themselves available, now, we would like you as the applicant to reconduct this outreach with those specific individuals that made themselves known. So, that's, those are kind of the two options.

Mr. Giovanni: Yeah. So, there's two options. And I understand that. And I exercise the first option, which is on the surface, it looks like it may be adequate, but I can't deduce that in a matter of moments. So, I would like the time to review this, and I may come back and say, I would like additional consultations to be made, or I may come back and say I'm satisfied that it's sufficient and adequate. Either way, I need some time to make that determination.

Chair Streufert: Alright, would you like to make a motion to defer this until the September meeting?

Mr. Giovanni: I would like to make a motion that this application be deferred to the September meeting to provide the commission adequate time…

Chair Streufert: And the public.

Mr. Giovanni: …and the public to review the Ka Pa'akai analysis, and that has been put forth this morning, and we'll make a determination at that time.

Ms. Barzilai: How are we doing on time? We're okay?

Mr. Giovanni: Pardon me.

Ms. Barzilai: How are we doing on time with regard to our schedule…

Mr. Britton: May I make a suggestion?

Ms. Barzilai: …because we might need some (inaudible). Yes.

Mr. Britton: Grove Farm would be willing to, if we can have the commission issue tentative subdivision approval today, we would accept as a condition consulting with the people that have made themselves known and submitting an updated Ka Pa'akai, including their consultation as part of the final subdivision conditions.

Mr. Giovanni: I think that would be a very generous thing to do.

Mr. Britton: Yeah.

Chair Streufert: Before we do that, what do you mean by a tentative approval?

Ms. Barzilai: Tentative approval of the application so that there could, then there are things that happen before the final comes back to you. And what the applicant is suggesting is that they would conduct the interviews and further analysis during that process before the final came back to you. But that's not what I understand Commissioner Giovanni is asking for.

Mr. Giovanni: No, I'm not giving tentative approval.

Chair Streufert: That's what I was wondering about.

Mr. Giovanni: I misunderstood, what he said…

Chair Streufert: Because tentative approval would still mean that they could continue with whatever they're doing now.

Ms. Barzilai: They would go on to the next phase. And…but if the applicant is suggesting that they would voluntarily interview these parties and come back to you with an amendment, that's something different. That's up to whether the applicant wants to do that voluntarily. But what you're saying is that for the moment, you just need the additional time.

Mr. Giovanni: I just need additional time. Option number one, that County Director submit, clarified to review this report and determine whether I feel it's adequate or not, or whether I feel that additional interviews are required or not.

Chair Streufert: So, we'd like to, you'd like to defer it until the September meeting.

Mr. Giovanni: September meeting.

Ms. Barzilai: Your other option, as Ka'aina stated, would be to ask the two testifiers to go through their analysis of their, of the impact to their family. And you could include that in the record if you want more detail from them at this time.

Mr. Giovanni: Well, I presume that this now being available, the two testifiers are going to dig into it, and we'll see them in September anyway.

Ms. Barzilai: Okay.

Mr. Giovanni: That's sufficient. That's sufficient for me.

Ms. Barzilai: Okay.

Chair Streufert: But a Ka Pa'akai analysis is not just about the immediate impact or the direct impact upon their families, but it's about the impact upon the, the, the rest of the community also.

Ms. Barzilai: The, the affected lands, yes. But these two testifiers came forth and said that they have specific information, so…

Mr. Britton: Yeah, again, there's no change in use here in what we're discussing, which is agricultural lands with tenants, agricultural tenants on them that will be shifted over to Agribusiness Development Corporation once Agribusiness Development Corporation purchases the land. So, it's the same tenant staying in place just with a new overseeing government agency, implementing and overseeing…

Mr. Giovanni: Understood.

Mr. Britton: …the tenants. And again, I, my suggestion would be if we could obtain tentative subdivision approval, we would include an updated Ka Pa'akai that would incorporate the testimony from today's two testifiers and anyone else who made themselves known to us.

Mr. Giovanni: In my mind, that's the cart before the horse, providing tentative approval, so I do not support that.

Chair Streufert: What would what would go on between now and September if you were to have a tentative approval?

Mr. Britton: Well, it allows us to work with the various county agencies to get any kind of comments that they have. I saw that in the subdivision report, most do not have any, but we're still required to go through the process of consulting each of these agencies on various aspects of the subdivision and what impacts it might have in terms of fire and water and planning and, and all that sort of things. Here there's no streets, there's no gutters, there's no sewer that's being done. This is all just agricultural land. But, you know, there is a, a process that takes quite a while for us to work with the state to get this purchase through. So as part of that, we're trying to get the tentative subdivision approval as soon as possible, because that allows us to hit certain milestones with the state. So, deferring it puts additional pressure on the parties to get it done in the time frame that we're required to get it done in terms of funding and other things. So, not much will happen between now and the next meeting, other than consultation with the parties that have made themselves known to us and anyone else who comes forward. But it is helpful to us in terms of moving the transaction forward to hit the timelines that the parties have, have already established.

Chair Streufert: Is the timeline something that's legally mandated, or is the timeline something that you have in your own company?

Mr. Britton: And it's not legally mandated, but there's, you have to work with the various agencies at the state level. And there's, you know, timeframes that we've established that this puts additional pressure on us if we wait. I…otherwise, I think all of the conditions of tentative approval, all the conditions that would allow you to issue tentative approval have been met.

Mr. Giovanni: You want a motion?

Chair Streufert: Yes.

Mr. Giovanni: I move that this matter be deferred until September meeting to provide adequate time for the commission to review the Ka Pa'akai analysis.

Chair Streufert: As well as for the public to review it.

Mr. Giovanni: So, the public can review it and comment.

Chair Streufert: Second. It's been moved and seconded that this be deferred for one month to the September meeting. Any discussion before we continue on? Okay. Roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Commissioner Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0.

Mr. Britton: Thank you.

Ms. Barzilai: I'd like to also note that the Ka Pa'akai will be made part of the record and published. There were some copies on the table and it will be disseminated to the public.

Chair Streufert: As a note, since this has been, has come up twice now, when a subdivision application is published, can the Ka Pa'akai analysis also be attached to it for the public when it comes out?

Mr. Hull: We can work to get that done.

Chair Streufert: Thank you.

Mr. Giovanni: Yeah, and if one is not required, (inaudible) to the commission, to the department's report.

Preliminary Subdivision Extension Request

Mr. Hull: Next on the agenda, we have Agenda Item G.2. These are preliminary subdivision requests.

Subdivision Application No. S-2025-4
Po'ipu Kai Association/ County of Kaua'i
Proposed 2-Lot Subdivision
TMK: (4) 2-8-027: 022
Weliweli, Koloa, Kaua'i

1) Subdivision Report pertaining to this matter.

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

Mr. Estes: 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: Any questions for the department?

Mr. Giovanni: No.

Chair Streufert: Is the applicant here?

Mr. Michael Moule: Good morning. Michael Moule, Chief of Engineering Division, Public Works for the record.

Chair Streufert: Would you like to say anything about this application?

Mr. Moule: Yes. So, this is for our Po'ipu Road safety and mobility project. We've got a right of entry agreement or property adjustment agreement, as it's called for the property to construct the roundabout that we've pretty much finished construction on, except for the final paving and landscaping. And we want to make sure that the portion of the roundabout that would be used by the public traveling along Kōloa, sorry, along Po'ipū Road, including pedestrians and the little island on that approach is all within future county property, so that the county would have responsibility for that area, for the traveling public and for the maintenance of the landscaping in the area, which will be done through a public private partnership. And so, we're just, we're just trying to get that portion of that road right of way that's long been a publicly used, but privately owned road, getting a portion that's going to be used by the public, traveling on, not Pe'e Road, but on Po'ipū Road in the county property. So, after the subdivision, we would take the one parcel and take it to county council for dedication to be county property.

Chair Streufert: And this is your first extension on this?

Mr. Moule: I believe so.

Mr. Estes: It's the first extension.

Chair Streufert: Any questions? Are we ready for a vote or ready for recommendation?

Mr. Estes: It is recommended that an extension be granted until April 8th, 2027.

Chair Streufert: Motion, please.

Mr. Giovanni: Yeah, I move that extension be granted to 2027.

Chair Streufert: Second. Roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0. Next we have;

Subdivision Application No. S-2025-6
Niu Pia Land Company, Ltd.
Proposed 2-Lot Consolidation
TMKs: (4) 3-6-003: 017 and 061
Kalapaki, Lihu'e, Kaua'i

1) Subdivision Report pertaining to this matter.

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

Mr. Estes: Ka'aina, I'm sorry, I think we skipped one item, G.2.b.

Mr. Hull: Oh, I apologize, the next agenda item is 2.b.

Subdivision Application No. S-2025-5
State of Hawai'i - Department of Hawaiian Homelands
Proposed 2-Lot Subdivision
TMK: (4) 4-8-018: 009
Anahola, 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…

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 the applicant here?

Ms. Arismendez: Good morning, commissioners. Just like to respectfully request the extension to allow the owner and the lessee time to complete the requirements. Just for clarification purposes, the water meter, we are working with Department of Hawaiian Homelands and Aqua Engineers because Anahola is a private system.

Chair Streufert: Any questions for the applicant? In that case, I'm ready for the motion.

Mr. Giovanni: I move that the request for an extension to April 2027 be granted.

Chair Streufert: Second. Roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0.

Ms. Arismendez: Thank you.

Mr. Hull: Next, we have returning back to subdivision.

Subdivision Application No. S-2025-6
Niu Pia Land Company, Ltd.
Proposed 2-Lot Consolidation
TMKs: (4) 3-6-003: 017 and 061
Kalapaki, Lihu'e, 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: I'll summarize the report.

> 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: Any questions for the department? Is the applicant here?

Mr. Tommy Ouye: Good morning. My name is Tommy Ouye, the land surveyor for this project. Do you have any questions that need to ask me or on this project?

Chair Streufert: I think it's pretty clear from the application. Are we ready for a motion?

Mr. Giovanni: We have a recommendation?

Mr. Estes: It is recommended that an extension until April 8th, 2027, be granted.

Chair Streufert: Motion please.

Mr. Giovanni: I move the extension request be approved.

Chair Streufert: And this is the first extension that's been provided. Can we have a roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0. Next, we have the last agenda, oh sorry…the last Preliminary Subdivision Extension Request, which is G.d.

Subdivision Application No. S-2025-7
Tink Tank, LLC.
Proposed 2-Lot Boundary Adjustment
TMKs: (4) 2-1-003: 016 and 031
Ele'ele, 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, the department will turn it back over to the subdivision planner.

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: Any questions for the department?

Mr. Giovanni: No.

Chair Streufert: Is the applicant here?

Mr. Estes: Sorry, the applicant contacted the Planning Department and he's unable to, he was unable to attend this meeting.

Mr. Giovanni: The recommendation is to approve the exemption?

Chair Streufert: Yes. That's what he said, for one year.

Mr. Giovanni: Yeah. I move that the extension request be granted to, for one year.

Chair Streufert: Second. Could we have a roll call vote, please?

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

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0.

Final Subdivision Map Approval

Mr. Hull: Lastly, we have G.3 Final Subdivision Map Approval.

Subdivision Application No. S-2025-2
Kukui'ula Parcel Q Subdivision
Makai Koloa, LLC. Et Al.

Proposed 3-Lot Consolidation and Re-Subdivision into 20 lots
TMKs: (4) 2-6-014: 041 and 046 / 2-6-015: 005
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, the department would like to turn it back over to the subdivision planner.

Mr. Estes: I'll summarize the report.

> 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: Could you talk a little bit about what the Department of Housing has come back with, and their review?

Mr. Estes: Yeah. So, I think…

Chair Streufert: This does trigger potentially the workforce housing requirement. So, if you could respond to that.

Mr. Estes: Yeah. So, the housing agency responded with their pre final comments. And I think it was just to address the current status of where the Kukui'ula Master Plan Development as a whole is with the county housing agency's requirements. And so, I believe in clarification, they did not, this subdivision does not exceed the 1500 units of the max density that's outlined in the ordinance for the master planned area.

Chair Streufert: So, this is part of the overall master plan, and the housing requirements were for the overall master plan, and it fits within those constraints? Is that correct?

Mr. Estes: That's correct.

Chair Streufert: Any other questions for the department?

Mr. Giovanni: No.

Chair Streufert: Is that the applicant here?

Mr. Lindsey Crawford: Good morning, commissioners. For the record, Lindsey Crawford representing Makai Koloa, LLC. Here to answer any questions that you might have.

Chair Streufert: I believe this area is next to an area that has a heiau, and a archeological area. Is that correct?

Mr. Crawford: There's, you're talking about the preserve adjacent to the project? There is a preserve, yes.

Chair Streufert: And does this consolidation include any part of that?

Mr. Crawford: No. That was a separate parcel, completely separate isolated from it, but it is adjacent to it.

Chair Streufert: Has there been any indication that there might be something archeological in that area that might be of concern for…

Mr. Crawford: Well, the research was done a long time ago, that found all the archeology and therefore preserved it in the preserve. But that other, on parcel Q, no.

Chair Streufert: Any more questions? So, everyone has already testified on this that has wanted to testify on this. Do we…and the Ka Pa'akai analysis that was done previously would also hold for this area is that correct?

Mr. Hull: Yeah.

Mr. Estes: A Ka Pa'akai analysis was submitted at the time of receipt of the subdivision application, and it was provided to the Planning Commission at the time of preliminary subdivision map approval.

Chair Streufert: Motion please.

Mr. Giovanni: Just summarize your recommendation, please.

Mr. Estes: It is recommended, the department is recommending final Subdivision map approval of this application.

Mr. Giovanni: I so move that application be approved as recommended by the Planning Department.

Chair Streufert: Second. Roll call vote, please.

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

Mr. Giovanni: Aye.

Mr. Hull: Chair Streufert?

Chair Streufert: Aye.

Mr. Hull: Motion passes, Madam Chair. 2:0.

Mr. Crawford: Thank you, commissioners.

Mr. Hull: That concludes the Subdivision Committee meeting. We will be reconvening around approximately 9:15 for the Planning Commission meeting. Thank you.

EXECUTIVE SESSION (None)

ADJOURNMENT

Chair Streufert: Meeting adjourned.

Chair Streufert adjourned the meeting at 9:06 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

TRANSMITTAL OF PUBLIC TESTIMONY TO

PLANNING COMMISSION

DATE: October 7, 2026

PERMIT NUMBER(S): S-2027-1

APPLICANT(S): Grove Farm Company, Inc./State of Hawaii-Agribusiness Development Corporation

Attached for the Planning Commission's reference is public testimony pertaining to the permit application referenced above.

F.1.a.4.
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Kauai County Farm Bureau
Affiliated with Hawaii Farm Bureau Federation
P.O. Box 3895, Lihue HI 96766-6895
808-855-5429
admin@kauaicountyfarmbureau.org
The Voice of Kauai's Agriculture
*KCFB a registered **501(c)5** non-profit organization*

KAUA'I COUNTY FARM BUREAU

September 5, 2026

Planning Commission
c/o County of Kauai
Planning Department
4444 Rice Street Suite A473
Lihue HI 96766

Aloha Mr. Kenneth Estes and Members of the Planning Commission

Subject: Subdivision Application Number S-2027-1, Grove Farm Company, Inc to the State of Hawaii – AgriBusiness Development Corporation(ADC) ~ proposed consolidation and re-Subdivision of Tax Map Key's: (TMK's) (4) 3-8-018:001 and 009

Kauai Farm Bureau wishes to go on record in support of this subdivision application. We understand that this consolidation and re-subdivision-ing will secure and preserve 1,000 acres of "agricultural" lands in perpetuity. Keeping these lands in productive and long-term agriculture for the benefit of farmers and ranchers. To have secure and long-term access to these agricultural lands with irrigation water is essential to successful farming ventures. We continue to work towards enhancing our resilient and successful diversified agricultural industry.

We humbly ask that the Kauai Planning Commissioners approve this application. Thank you for this opportunity to express our support for saving these "agricultural" lands for "agriculture!"

Respectfully submitted,

Laurie K. Ho

Laurie Ho for
Jaime Barna
Gary Ueunten;
Eric Hansen;
Bill Spitz;
Randy Uyehara;
James Robinson;
& Yawadee Srimake-Yadao

"Kaua'i County Farm Bureau **(KCFB)** cultivates a thriving and prosperous agricultural sector, firmly rooted in the community, by working collaboratively to build long term support and providing a respected voice for Agriculture on Kauai " **adopted July 2013**

JOSH GREEN, M.D.
GOVERNOR

SYLVIA LUKE
LT. GOVERNOR



MARK H. TAKEMOTO
ACTING EXECUTIVE DIRECTOR

STATE OF HAWAI'I
AGRIBUSINESS DEVELOPMENT CORPORATION
HUI HO'OULU AINA MAHIAI

September 9, 2026

TRANSMITTED VIA EMAIL ONLY: planningdepartment@kauai.gov

Mr. Ka'āina Hull
Planning Director
County of Kaua'i Planning Department
4444 Rice Street, Suite 473
Līhu'e, Hawai'i 96766

Subject: ADC Explanatory Letter Regarding Subdivision S-2027-1 – Agribusiness Development Corporation and Grove Farm

Dear Planning Director Hull:

The Agribusiness Development Corporation (ADC) submits this explanatory letter in support of its request, with Grove Farm Company, Inc., for approval of Subdivision S-2027-1. This letter explains ADC's statutory mandate and the public agricultural purpose served by the proposed acquisition and subdivision. It is distinct from, and should be considered together with, any independent letters of support submitted by agricultural organizations and community stakeholders.

On April 30, 2026, the ADC Board approved the purchase of approximately 1,000 acres of agricultural land from Grove Farm Company, Inc., located along the eastern boundary of Ma'alo Road in Līhu'e, Kaua'i. The requested subdivision is necessary to create the parcel that ADC proposes to acquire, subject to the approval of the Kaua'i Planning Commission. ADC is not requesting a change in land use.

The Legislature established ADC in 1994 through Act 264, Session Laws of Hawai'i 1994, now codified in chapter 163D, Hawai'i Revised Statutes. ADC was created during the historic downsizing of Hawai'i's sugar and pineapple industries. That transition released thousands of acres of agricultural land, approximately fifty million gallons per day of irrigation water, and plantation infrastructure, including irrigation systems, roads, drainage systems, processing facilities, workshops, and warehouses, that could either be lost and fragmented or conserved and converted to productive agricultural use.

Chapter 163D created ADC as the public vehicle to make optimal use of these agricultural assets for the economic, environmental, and social benefit of Hawai'i's people. Under HRS § 163D-1, ADC is charged with supporting economically and environmentally sustainable production for local consumption; facilitating the transition of former plantation lands and infrastructure to diversified agricultural enterprises; increasing local agricultural production; reducing reliance on imported agricultural products; and expanding access to farmland and related infrastructure for small local farmers and cooperatives. HRS § 163D-4 expressly authorizes ADC to acquire, own, improve, rehabilitate, and manage real property and agricultural infrastructure for these purposes.

This acquisition carries out that mandate directly. The approximately 1,000-acre property is contiguous to ADC's existing approximately 5,720.4 acres on Kaua'i. Bringing it into public agricultural ownership would preserve a large, connected block of working agricultural land; reduce the risk of fragmentation or conversion away from productive agriculture; and allow land, access, water, roads, and other infrastructure to be planned and managed as an integrated agricultural resource. ADC anticipates working to provide continuity for existing farmers and ranchers on the property, including continued agricultural access associated with Kaua'i Cattlemen's weigh station, while offering long-term opportunities for diversified production at rents intended to remain accessible to local producers.

The acquisition also supports Hawai'i's broader food-security policies. Act 151, Session Laws of Hawai'i 2019, advanced the State's strategic goal of doubling local food production and agricultural exports by 2030. Act 175, Session Laws of Hawai'i 2021, established the Department of Education's goal that at least thirty percent of food served in public schools be locally sourced by 2030. These goals require more than purchasing directives: farmers and ranchers need stable access to land, infrastructure, and sufficient production capacity to supply public institutions and other local markets consistently. Preserving and coordinating this acreage creates the production base needed to increase local supply, strengthen aggregation and distribution opportunities, reduce dependence on imports, and help local producers compete for institutional purchasing opportunities.

The proposed subdivision is also consistent with the County of Kaua'i's agricultural and land-use objectives, including the Kaua'i Agriculture Master Plan and the County's General Plan. It supports agricultural sustainability, economic diversification, environmental stewardship, food security, and preservation of Kaua'i's rural character and working agricultural landscape.

In short, this acquisition is precisely the type of action for which ADC was established: conserving a strategically located agricultural asset, integrating it with existing public

agricultural lands and infrastructure, maintaining access for working farmers and ranchers, and positioning the land to produce more food for Hawai'i. ADC therefore respectfully requests approval of Subdivision S-2027-1.

Sincerely,

Mark Takemoto
Mark H. Takemoto
Acting Executive Director

c: Mr. Donald Horner
Mr. Casey Watabu
Mr. David Brittin
Mr. Dane Wicker

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

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

Supplement #2 to Subdivision Report

RE: Subdivision Application No. S-2027-1

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

The Applicant has submitted an updated Ka Pa'akai Analysis prepared by Exploration Associates, Ltd., dated September 2026, for the Subdivision Committee's review and consideration (refer to Exhibit 'A'). The updated Analysis incorporates additional community outreach conducted.

Based on the information presented in the September 2026 Analysis, 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 Kenneth A. Estes
KENNETH A. ESTES
Planner

Date: 10.07.2026

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EXHIBIT 'A'

(Applicant's updated Ka Pa'akai Analysis dated September 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 and September 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 Ananlysis 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 subdivison 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 chages 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.

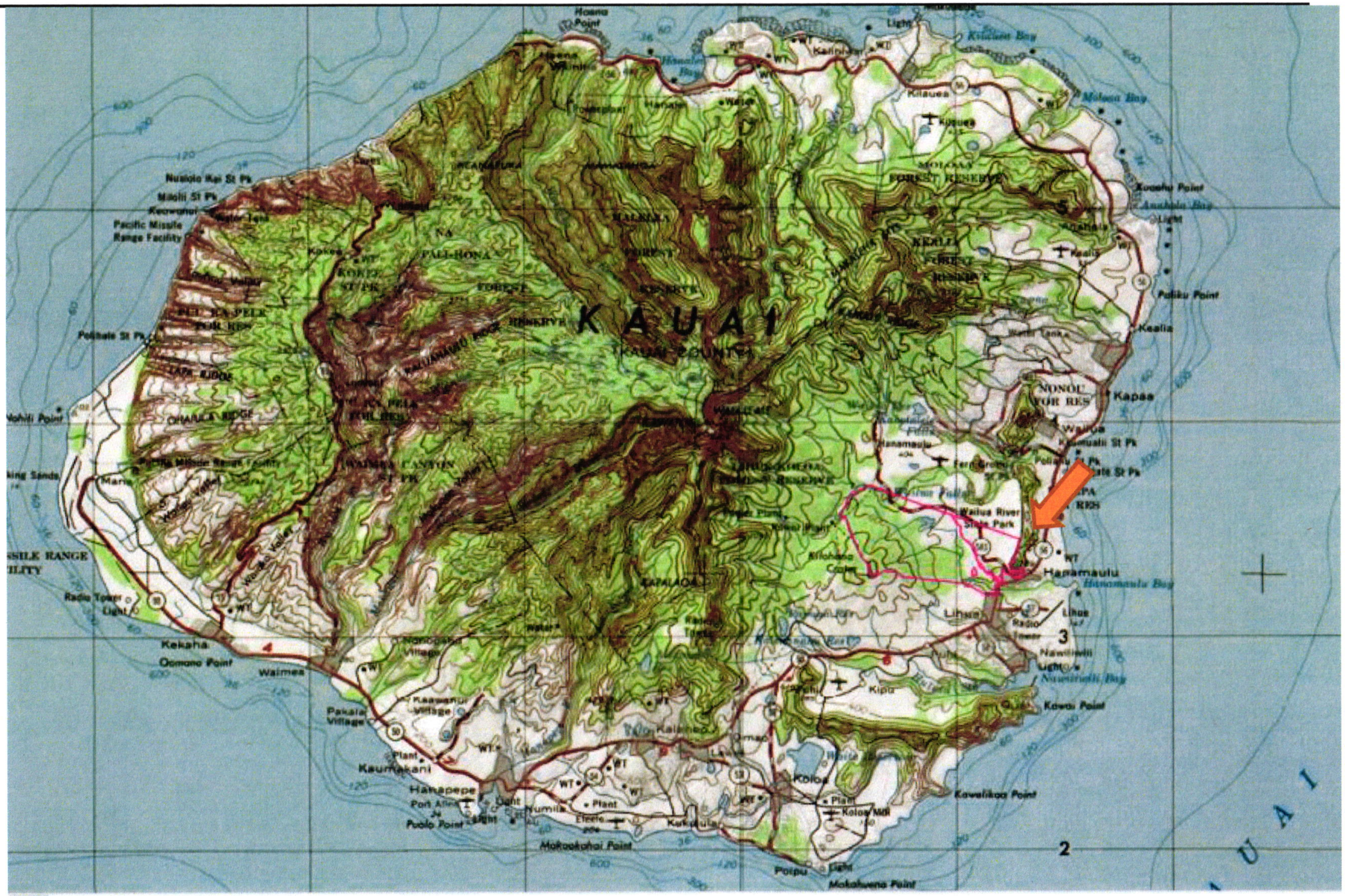


Figure 1. USGS Map of the Project Area in red outline.

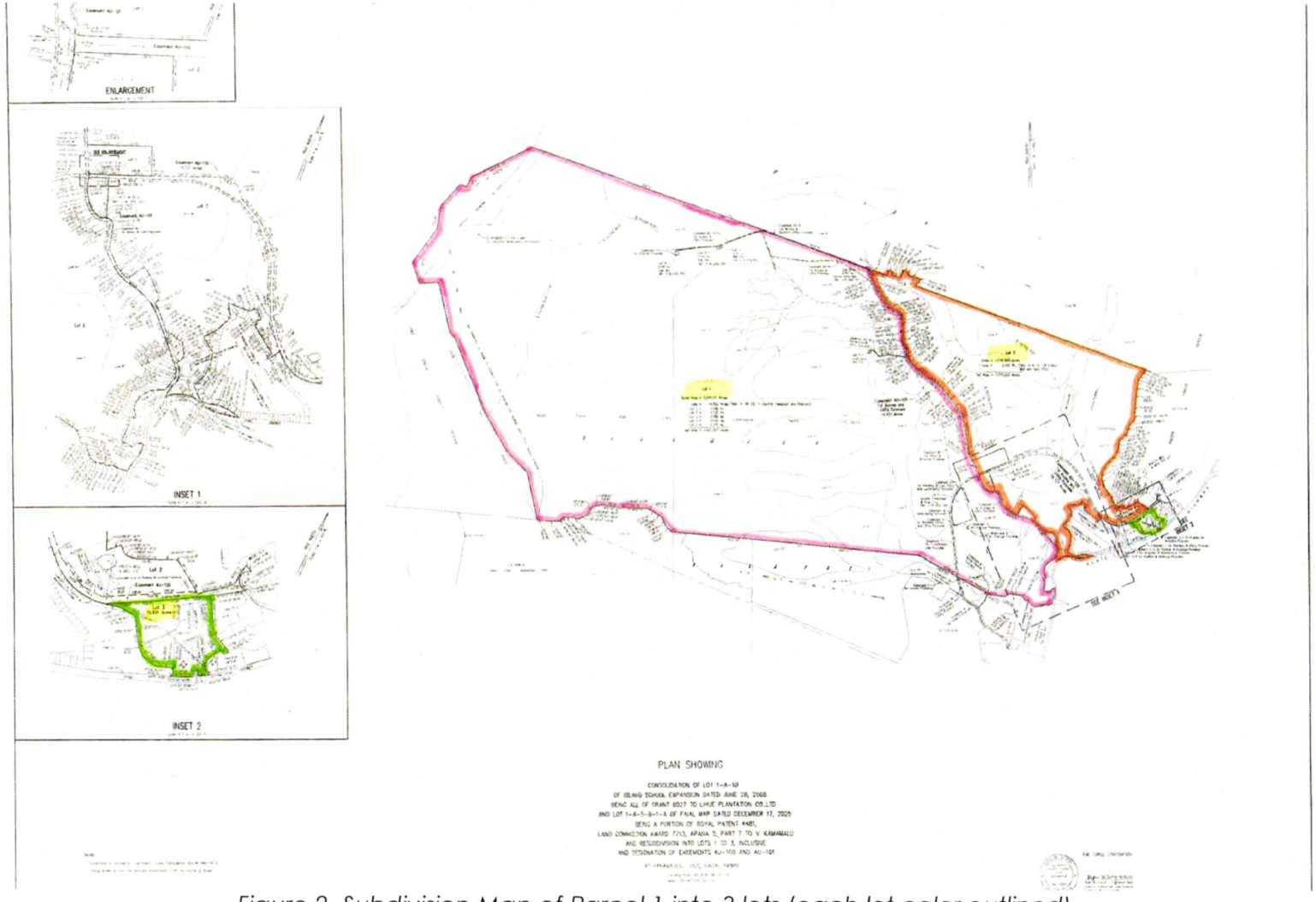


Figure 2. Subdivision Map of Parcel 1 into 3 lots (each lot color outlined).

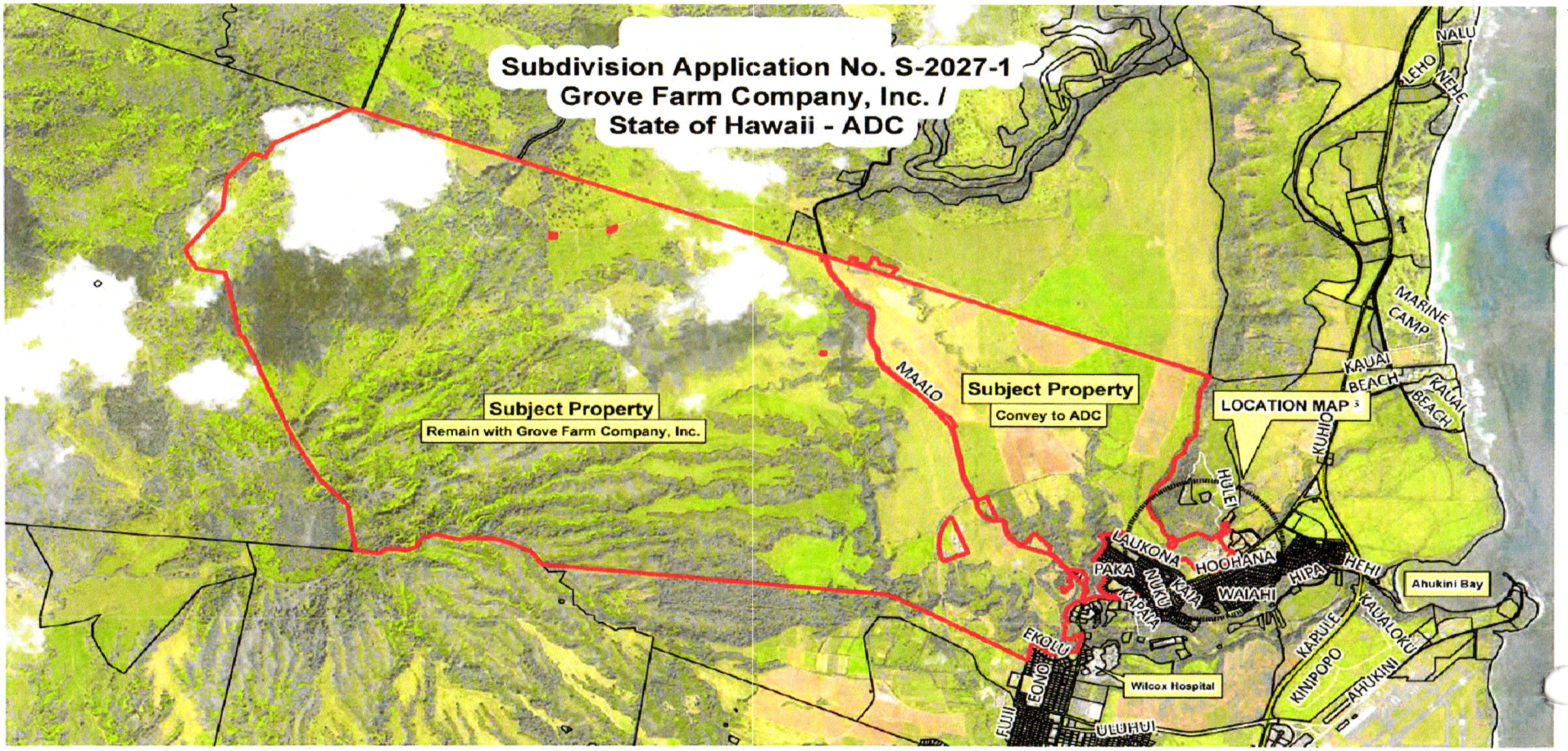


Figure 3. Imagery of the purposed parcels, in red outline.

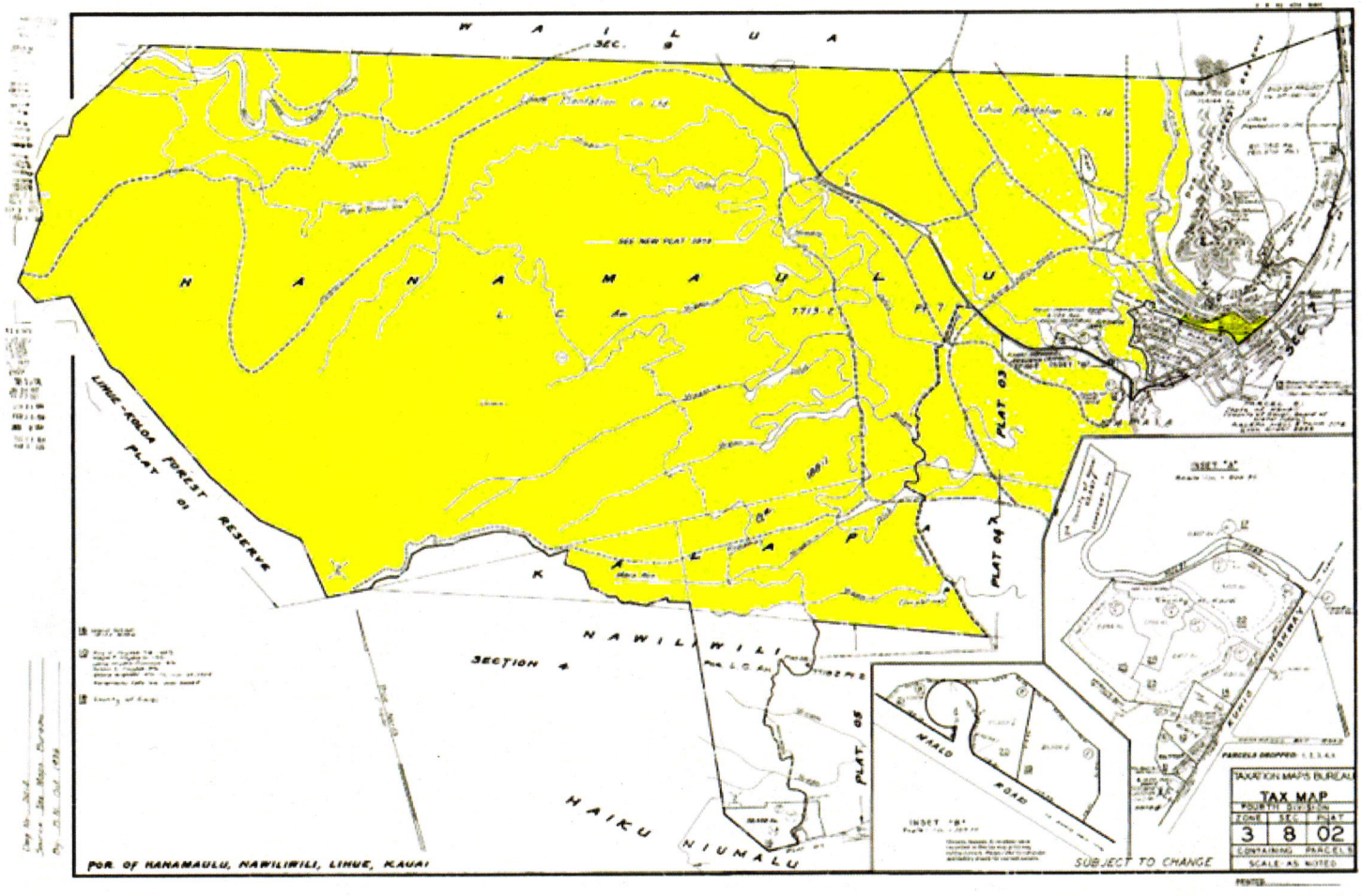


Figure 4. TMK: (4) 3-8-002:0001.

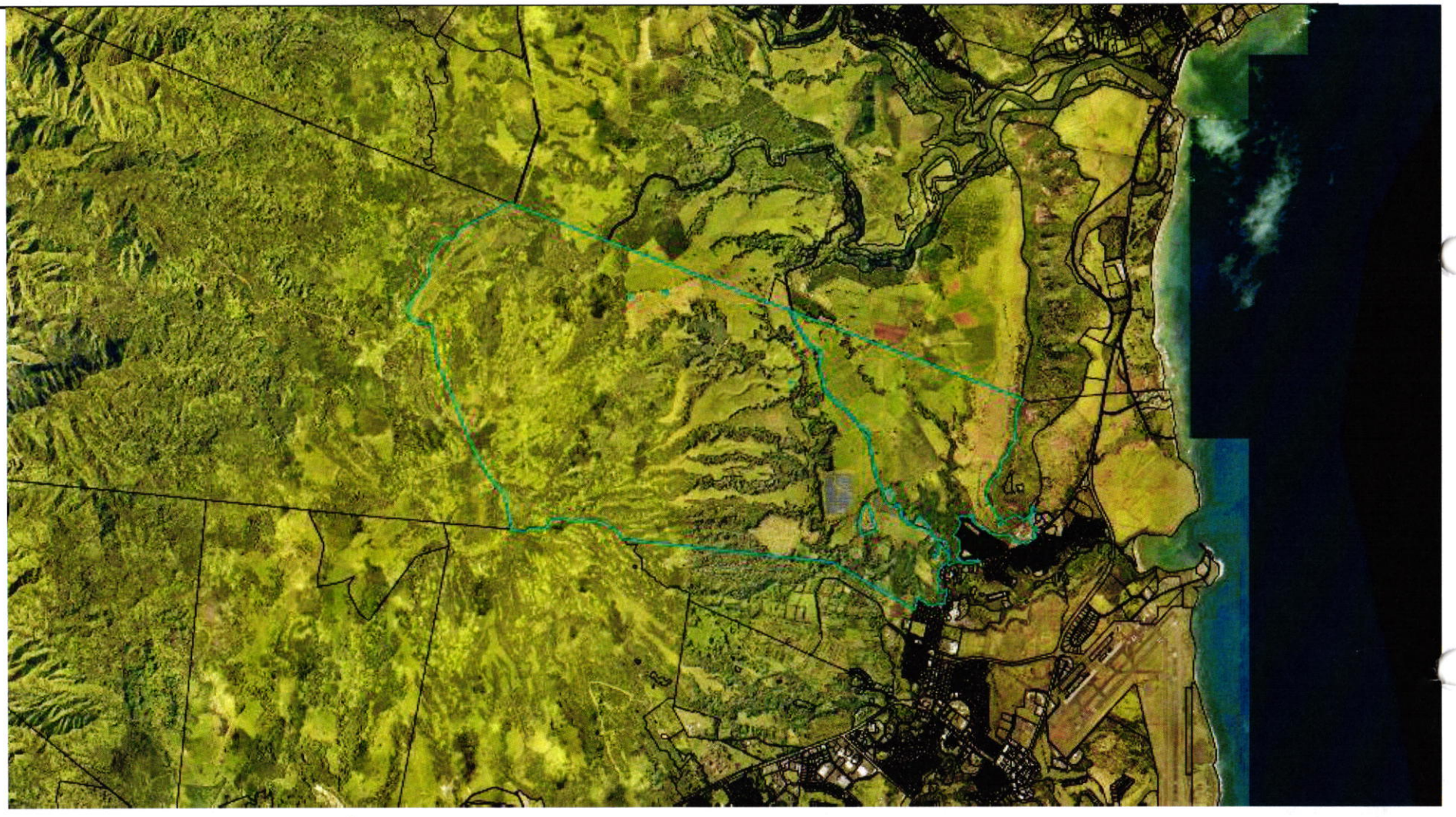


Figure 5. The aerial of the project area is outlined in blue. Source qpublic.net Kauai County.

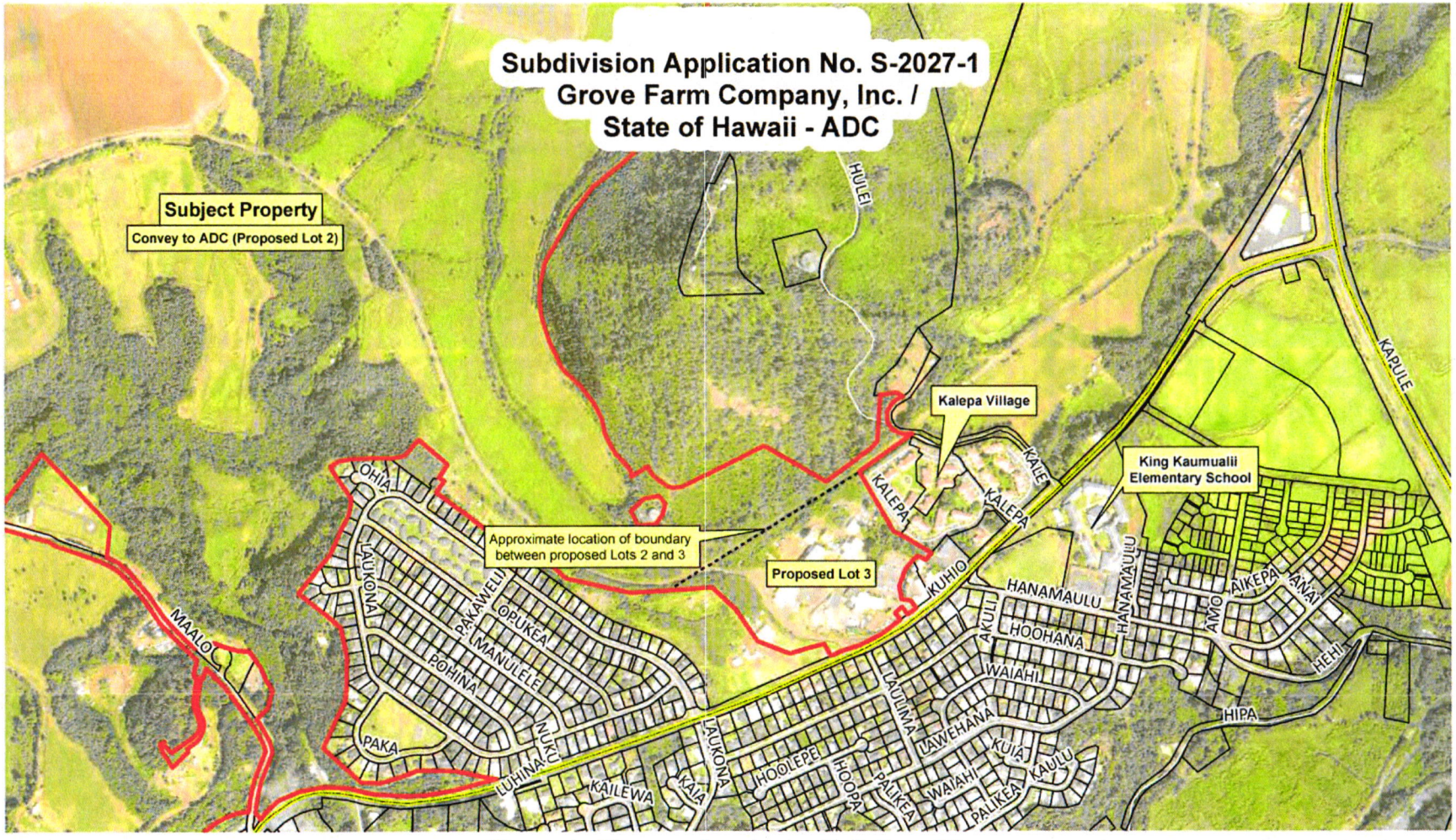


Figure 6. Close-up imagery of lots 2 and 3.

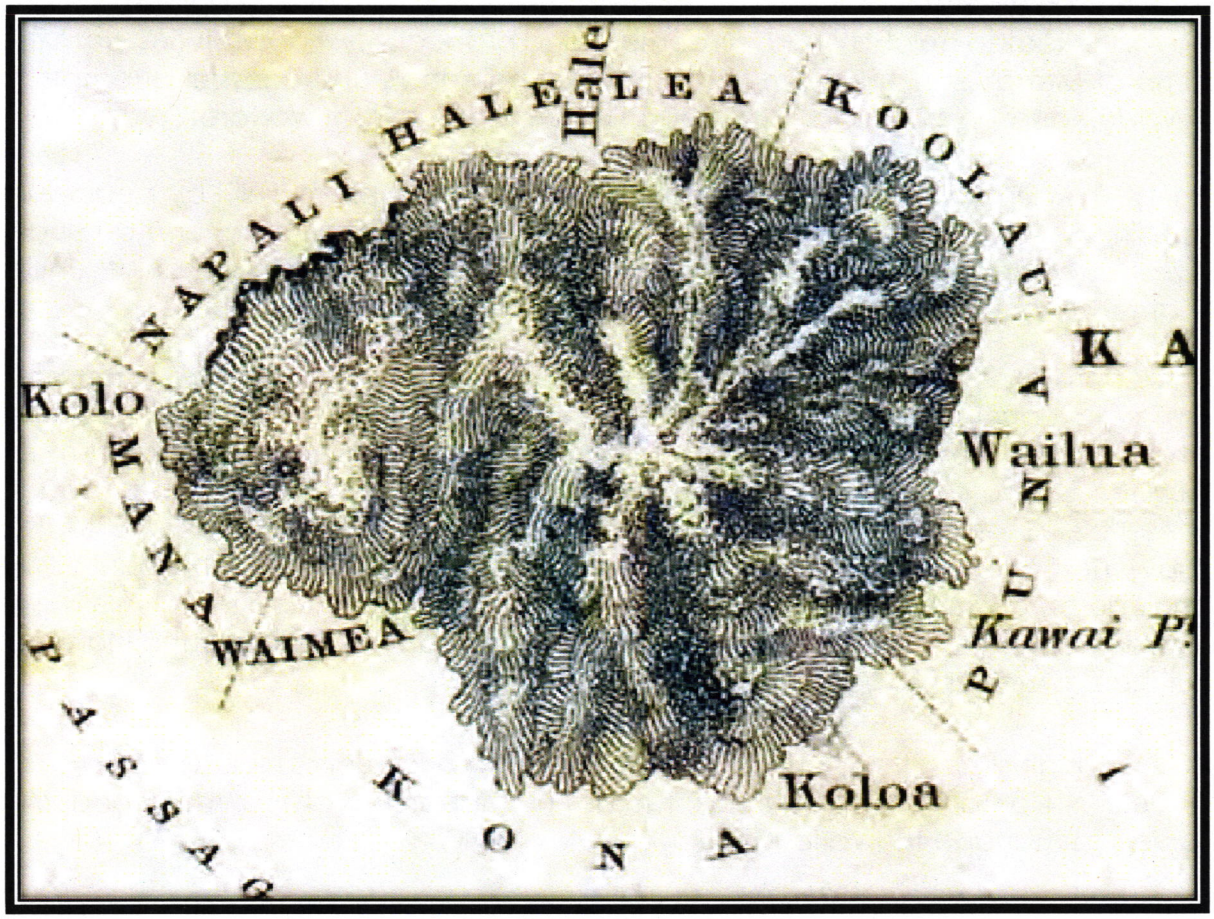


Figure 7. 1845 Map of Kaua`i by Charles Wilkes for U.S. Mapping Expedition. Note that it shows 6 moku or districts including Ko`olau, Halele`a, Nā Pali, Kona and Mānā. Typically, Kaua`i is dividied into 5 moku. Mānā is usually considered as part of the Kona moku.

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 proect 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 Kalapaki 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."

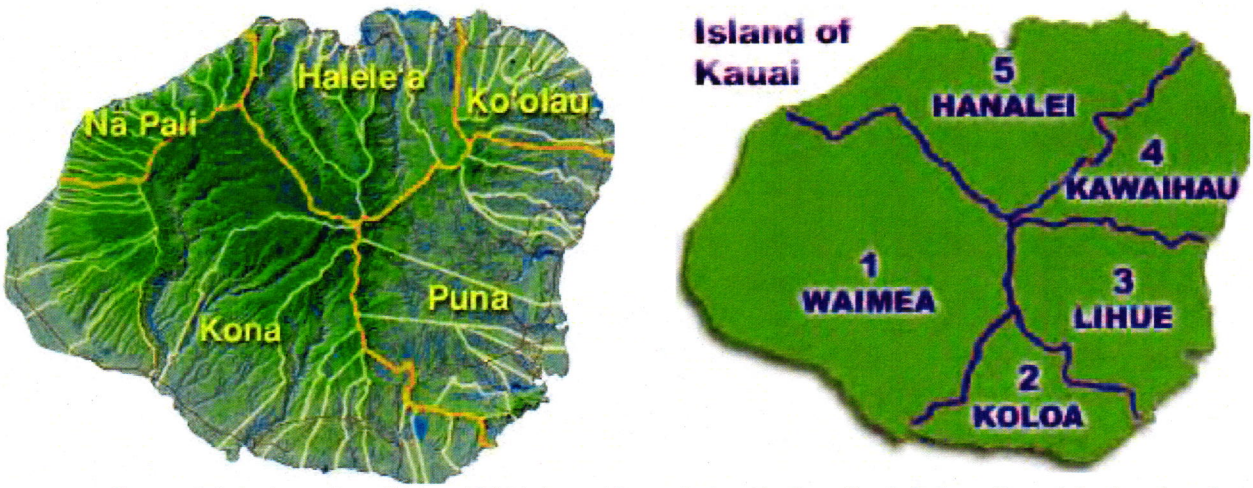
Historic documentation records the changing name of the district in which the *ahupua'a* of Hanamā`ulu is located. In earlier days, the *ahupua'a* was in the *moku* (district) of Puna, but today it is in the judicial district of Lihu'e (meaning "cold chill," or "gooseflesh").

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 ofHanama'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 'olua,* 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 ofKalopaki,
> *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 steams 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'iliahi, 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, Kahoewa	Four lo'i kalo (in the 'ili of Kapuahala) House lot near the seashore (at Kahoewa)
3558	Keke	Hoewa, Waiaoao, Hoena	Three lo'i kalo in the 'ili of Waiaoao 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	ʻĀpana 1: Six loʻi kalo in the ʻili of Kapaia ʻĀpana 2: House lot in the ʻili of Kapaia Claimant received his land from Keo in the days of Kaikioewa
3644	Kaualupa	Hanamāʻulu	ʻĀpana 1: Three loʻi kalo in the ʻili of Hanamāʻulu ʻĀpana 2: House lot in the ʻili of Hanamāʻulu Claimant received his land from Pau soon after Kanoa came to Kauaʻi 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 makaʻāinana 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 ʻili kūpono; nearly independent ʻili land division within an ahupuaʻa paying tribute to the ruling chief, not the chief of the ahupuaʻa) of Papuaʻa	ʻĀpana 1: One loʻi kalo called Moala in the ʻili of Waieo ʻĀpana 2: Eight loʻi cultivated (an additional 23 loʻi that are not under cultivation) ʻĀpana 3: House lot in the kū of Papuaʻa
3648	Kala, Gapeliela	Hoa, Wailua, Kalaniuli	ʻĀpana 1: Three loʻi cultivated and several not cultivated; kula ʻāina in the ʻili of Hoa ʻĀpana 2: Three loʻi cultivated and several not cultivated; kula ʻāina in the ʻili of Wailua ʻĀpana 3: House lot in the ʻili of Kalaniuli
3649	Kamalo	Noni	Five loʻi kalo in the ʻili of Noni and a small kula ʻāina adjoining; house lot (on kula ʻāina)
3650	Kaluhiwaha	Kaʻaukai, Pukakolu Village	Two loʻi kalo in the ʻili of Kaʻaukai; claimant has a house lot in the kūlanakauhale (village) of Puakakolu

LCA Number	Claimant	ʻIli	Land Use
3653	Koliʻi	Maulili, Kamakaihanahana Village	Four loʻi kalo with a small kula ʻāina adjoining in the ʻili of Maulili; the kula ʻāina is not being cultivated; enclosed house lot in the village of Kamakaihanahana
3657	Niho	Limawela	Four loʻi kalo in the ʻili of Limawela with a small kula ʻāina 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 loʻi kalo because they were old kōʻele (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 hoʻoponopono (to correct) the lands he took these two old kōʻele; 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	Kumakahachao	Kamakahanahana, Limawela	Four loʻi kalo and a small kula ʻāina 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 modem wharf was needed where ships could draw up alongside and load and unload supplies and passengers. Operations for this large harbor, the most modem 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 heaiu 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 1) 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 (Morriss et al., 2016) for the proposed Kaua'i landfill and resource recovery park identified SIHP #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 chie£ 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 mākua 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 mākua 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.	Wiilam Pavao	Grove Farm Security and Rancher Former Resident of land
12.	Lei Rivera	School Teacher
13.	Kanai Viado	Cultural Practioner
14.	Sabra Kauka	Kupuna, Līhu'e Resident
15.	Pat Kahawaiolaa	Hilo Resident
16.	Sherri Cummings	Līhu'e Resident
17.	Kanani Kagawa Fu	Hanamā'ulu Resident
18.	Russell Fu	Grove Farm Leasee
19.	Ryan Fu	Hanamā'ulu Resident
20.	Kurt Souza	Connected to Hanamā'ulu
21.	Lewellyn "Billy" Kaohelaulii	Ahu Moku Chair, Koloa Resident
22.	Jamie Olivas-Shanks	Hanamā'ulu Resident

Most of the interviews were conducted by EAL in May 2024 – December 2025.

Based on a Planning Commission Hearing on August 11, 2026, additional All additional informants attempted to be reached before the end of August 2026 but several occurred in September. 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. Two of the previous 14 were interviewed again by Leialoha Sanchez to verify their information (Appendix A - Notification Letter). Appendix B is a correspondence log. The additional interviews are in Appendix C of this report. 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. Līhu'e 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 throught 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. Occasionly hunters tried to hunt but not claiming any TCR. He was reinterviewed again by Leialoha Sanchez.

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 Pavio 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. He was reinterviewed again by Leialoha Sanchez.

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.

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

Mr. Kaohelauli'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 be 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.

Per the Planning Commission wishes to defer the material, they asked that the following be interviewed: Kanani Fu, Sherry Cummings and Pat Kahawaiolaa.

Pat Kawaiolaa was in discussion with Leialoha Sanchez and said he would email his responses. Never received.

Kanani Fu was interviewed by Leialoha Sanchez. No specific practices were stated for these parcels.

Nineteen attempts were made to interview Sherry Cummings. To date this has not happened yet.

Recently additional interviews concluded the same findings from back in December 2025.

Several Cultural Impact Assessemtnt 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

Exploration Associates Ltd
Consulting Archaeology – Land Use Planning – Construction – Project Management
3-2600 Kaumualiʻi Hwy 1300 - #306 LĪHUʻE, KAUAʻI, HAWAIʻI 96766
CELL: (808) 639-6695: Email: explorationassociates@outlook.com

E Welina mai,

The Ka Paʻakai Analysis remains open for cultural consultation regarding the consolidation and re-subdivision located at Maʻalo Road in the Hanamaʻulu Ahupuaʻa, Puna Moku, Kauaʻi [TMK: 3-8-018:001 and 009]. The landowner is proposing a consolidation of two (2) lots and re-subdividing under Kauaʻi 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 Maʻalo Road and containing approximately 1,076 acres, to the State of Hawaiʻi, 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 Paʻakai 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 Hanamaʻulu Ahupuaʻa, including:

- Cultural associations, moʻolelo (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 Paʻakai Analysis are invited to contact Leialoha Sanchez at Phone: 808-977-2127 or Email: community@leialohaliving.com by August 26, 2026.

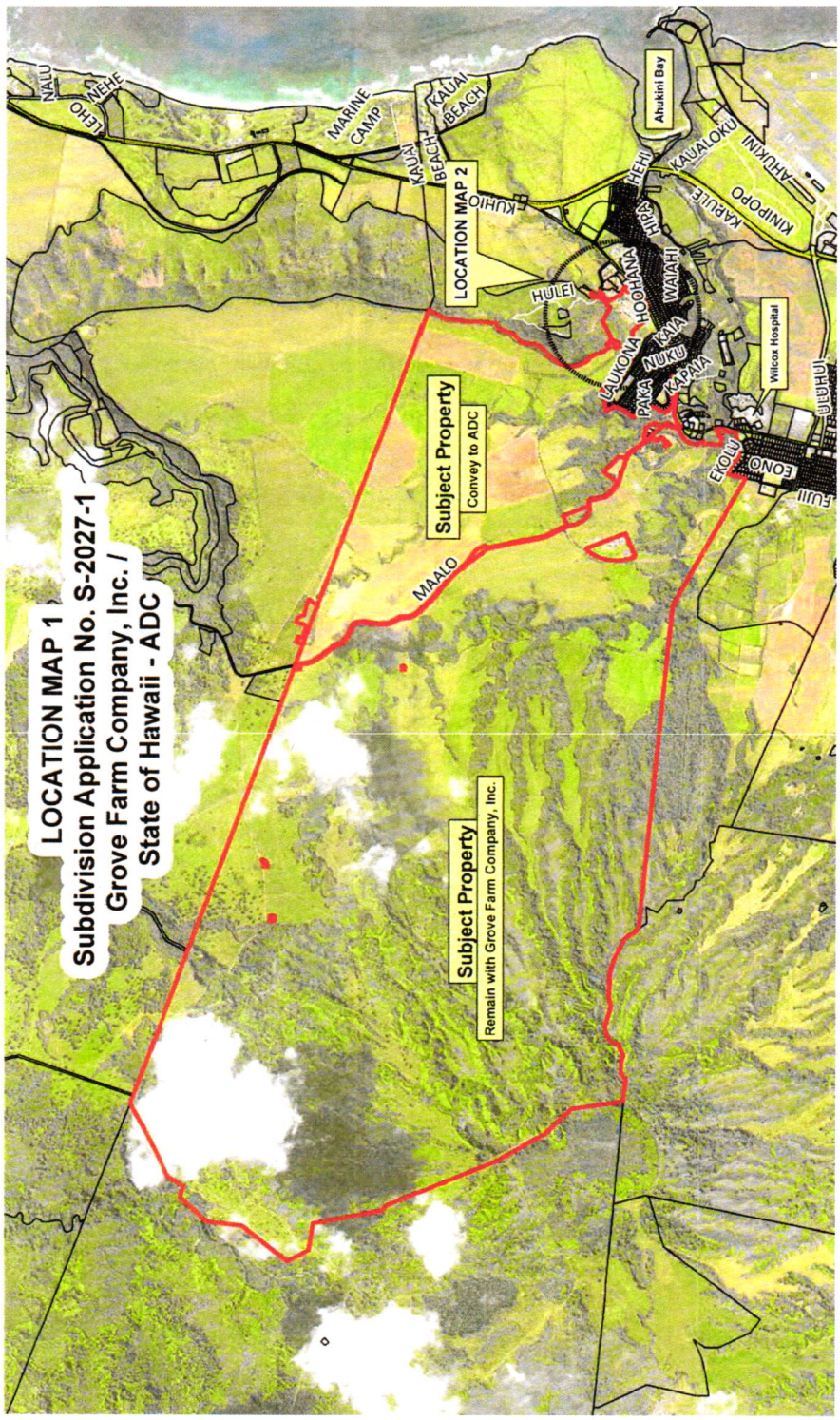
Very truly yours,

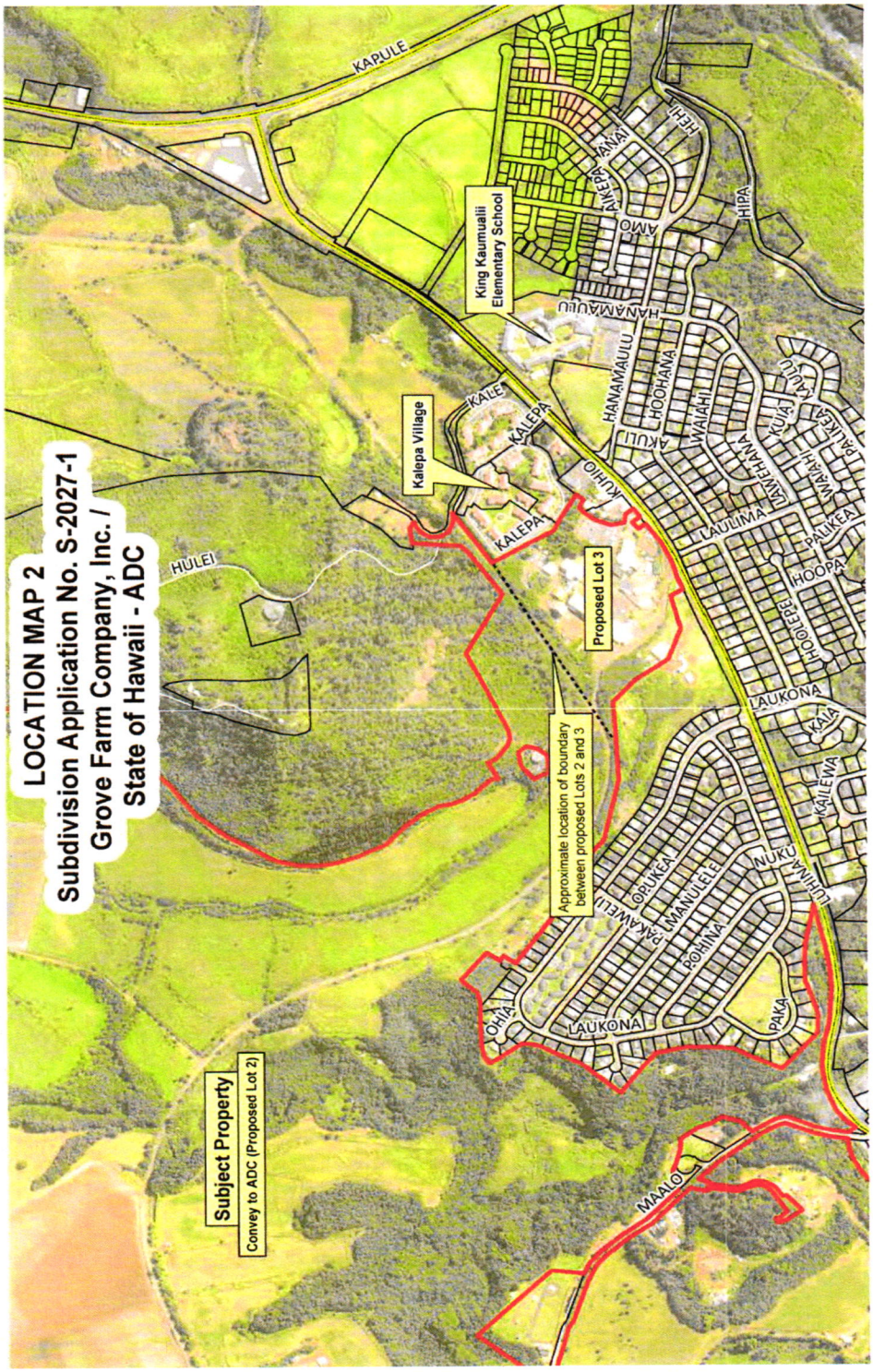
Nancy McMahon

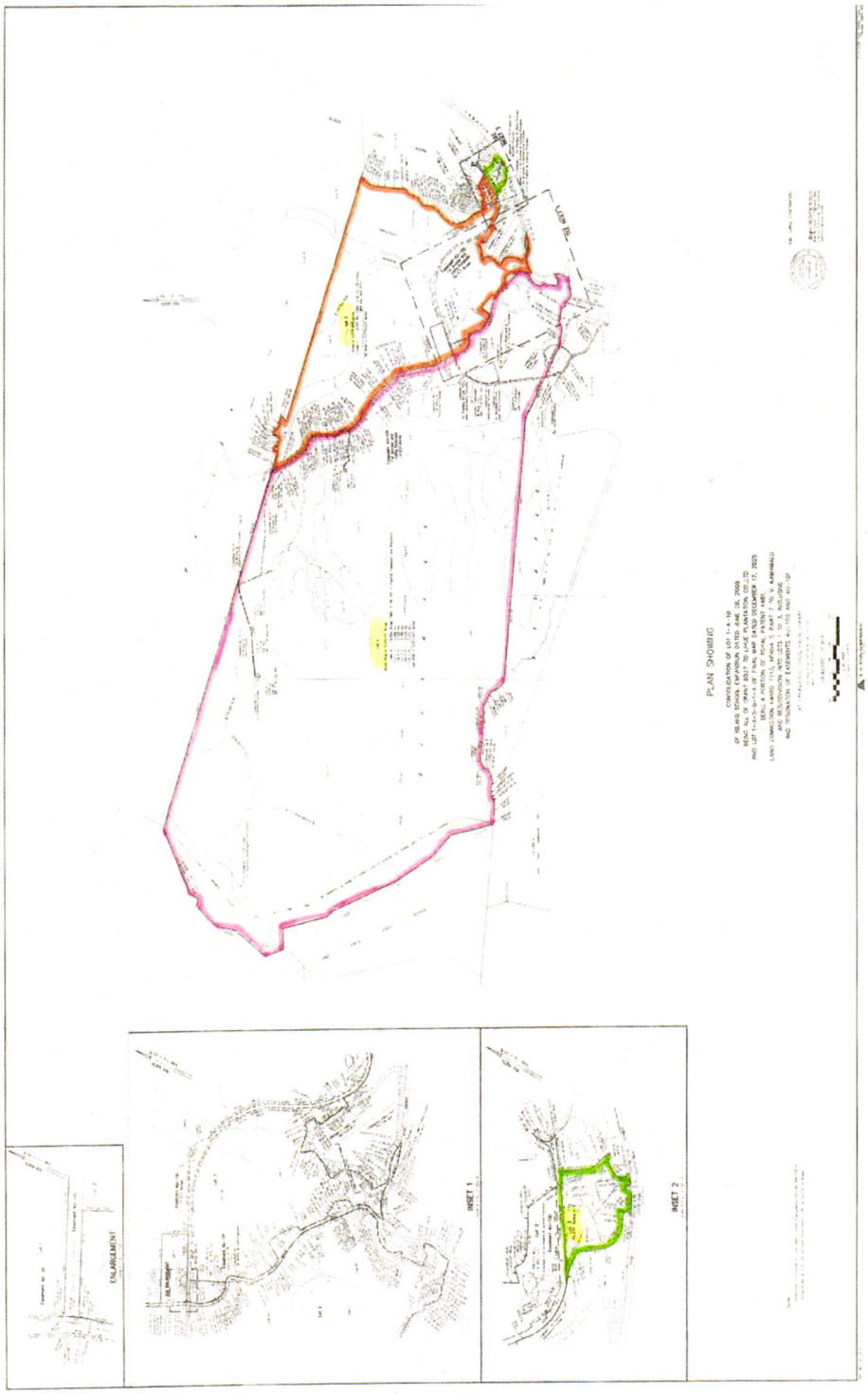
Nancy McMahon

Interview Questions

1. *Please provide your name.*
2. *What is your profession?*
3. *Where were you born and raised?*
4. *Where do you live now?*
5. *What is your association, if any, with the Project Area(s)? Based on the provided map, what place names do you know for the project area(s) or near the project area(s)?*
6. *Are you aware of any cultural resources in the Project Area(s) or near the Project Area(s)? And have you ever accessed those resources?*
7. *Are you aware of any traditions or customs that may take place near the Project Area(s) or are otherwise associated with the Project Area(s)?*
8. *Is there anything about the project area that's particularly significant you would like to share?*
9. *Are there any stories associated with the project area we should be aware of?*
10. *The proposed project is intended for future residential development. Are you aware of any resources that may be impacted by such a project? What might those impacts be? Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*
11. *Are you aware of any traditions or customs that may be impacted by such a project, including your ability to access cultural resources? What might that impacts be? Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?*
12. *Do you have any recommendations for conditions or best management practices for the project, should it proceed?*
13. *Is there anything else you would like to share?*
14. *Is there anyone else we should talk with about the projects or the Project Areas?*
15. *Is there anything in this interview you would like us to omit from the summary?*


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
KUHIO
HULEI
NALU
NEHE
LEHO
MARINE CAMP
KAUAI BEACH
KAUAI BEACH
Ahukini Bay
KAUALOKU
AHUKINI
KINIPOPO
KAPULE
HEHI
HIPA
HOOHANA
WAIAHI
KAIA
NUKU
KAPAIA
JAUKONA
PAKA
Wilcox Hospital
EKOLU
EONO
FUJII


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
KAPULE
HULEI
KALEPA
KUHIHIO
HANAMAULU
HOOHANA
WAIAHILI
AKULI
LAULIMA
HOOPA
PALIKEA
LAUKONA
KAILEWA
NUKU
LUHIHIWA
POHINA
MANULELE
OPUKEA
KAWELI
OHIA
PAKA
MAALOC
HIPA
AMO
HEHI


PLAN SHOWING
INSET 1
INSET 2
ENLARGEMENT

APPENDIX B

Correspondence Log

Contact Date/ Time	Contact Method	Response	Title/Position	First Name	Last Name
8/19/2026 11:42AM **8/25/2026 12:00PM**	In-Person In-Person at his residence	8/25/2026 Interviewed	Chair/Koloa	**Lewellyn "Billy"**	**Kaohelaulii**
8/20/2026 2:08PM **8/25/2026 12:05PM**	Phone Phone	8/25/2026-confirmed received Awaiting reply 10/1/2026 - no response	Familial Connection-'Ohana Shanks	**Jamie**	**Olivas-Shanks**
8/19/2026 6:15PM **8/26/2026 8:52AM**	Phone Text	Interview Scheduled for 8/26 @ 10am Reschedule 8/28/25026 Interviewed on 9/2/2026	Familial Connection	**Kurt**	**Souza**
8/21/2026 12:13PM **8/25/2026 3:25PM** **9/4/2026 10:35AM**	Email Email In-Person at her residence	No Response Replied with mtg dates Interviewed 9/4/2026	Resident/ Lineal Descendant	**Kanani**	**Kagawa (Fu)**

8/21/2026 12:46PM	Email	No Response	Kaua'i Resident /	**Sherri**	**Cummings**
8/25/2026 2:47PM	Email	No Response	Lineal Descendant		**(Pia)**
8/28/2026 3:34PM	Email	No Response			
9/01/2026 10:39AM	Phone	Replied mtg scheduled 9/4/26			
9/03/2026 5:54PM	Text	Rescheduled mtg due to family			
9/4/2026 6:24PM	Text	Rescheduled due to hurricane prep.			
9/22/2026 2:20PM	Text	Requesting new mtg			
9/22/2026 5:43PM	Phone (40min)	Questions regarding methodology			
9/23/2026 11:09AM	Phone	Questions regarding methodology			
9/29/2026 12:05PM	Phone (35min)	Questions regarding methodology			
9/30/2026 4:55PM	Phone (52min)	Questions regarding methodology			
10/1/2026 6:31PM	Text/Phone	Provided documentation unrelated			
10/1/2026 8:51AM	Phone (1hr. 21min)	Questions regarding methodology			
10/1/2026 11:15AM	Phone (2 hr. 53 min)	Questions regarding methodology			
10/1/2026 7:47PM	Phone (8 hrs. 10min)	Questions regarding methodology			
10/3/2026 8:36PM	Phone (52min)	Schedule interview for 10/4/2026			
10/4/2026 2:07PM	Text	Reschedule 10/4/2026 interview			
10/5/2026 9:56AM	Text	Request Interview mtg			
10/5/2026 11:18PM	Phone	Schedule phone interview for today by 4:30PM			
8/21/2026 1:02PM	Email	No Response	Lineal Descendant	**Pat**	**Kahawaioloaa**
8/26/2026 10:19AM	Phone	8/26/2026 Phone conversation. He will email his response			

8/24/2026 11:17AM **8/26/2026 9:09AM** **8/26/2026 9:36AM** **8/26/2026 1:05PM**	Phone (VM Recorded) Phone (VM Recorded) Phone Email Response received	No Response No Response Tracy (wife) called back asked for email 8/26/2026 response received	Grove Farm Lessee/ Familial Connection	**Russel**	**Fu**
8/24/2026 11:30AM **8/24/2025 11:50AM** **8/26/2026 9:19AM** **8/28/2026 5:16 PM**	Phone (VM Recorded) Text Text Phone Interview	No Response 8/28/2026 Interviewed	Familial Connection	**Ryan**	**Fu**
8/28/2026 1:31PM	Phone Interview	8/26/2026 Interviewed	Grove Farm former Property Manager, former resident, and current lessee	**Boyd**	**Gayagas**
9/1/2026 10:25AM **9/1/2026 11:44AM** **9/1/2026 2:38PM**	Phone (VM Recorded) Phone (VM Recorded) Phone Interview	9/1/2026 Interviewed	Grove Farm Property Manager and current lessee	**Will**	**Pavao**

APPENDIX C

Interviews

Interview Questions

1. Please provide your name: Russell Fu
2. What is your profession? Farmer & Rancher
3. Where were you born and raised? Kauai
4. Where do you live now? Kauai
5. What is your association, if any, with the Project Area(s)? None Based on the provided map, what place names do you know for the project area(s) or near the project area(s)? I know the same place names you have already listed on your Location Map 1 & Location Map 2
6. Are you aware of any cultural resources in the Project Area(s) of near the Project Area(s)? No. And have you ever accessed those resources? No
7. Are you aware on any traditions or customs that may take place near the Project Area(s) or are otherwise associated with the Project Area(s)? No
8. Is there anything about the project area that's particularly significant you would like to share? No
9. Are there any stories associated with the project area we should be aware of? No
10. The proposed project is intended for future residential development. **Your solicitation for comments specifically states:** '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.' Are you aware of any resources that may be impacted by such a project? No What might those impacts be? Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?
11. Are you aware of any traditions or customs that may be impacted by such a project, including your ability to access cultural resources? No. What might that impacts be? Can you think of ways in which any potential impacts can be minimized, mitigated, or avoided?
12. Do you have any recommendations for conditions or best management practices for the project, should it proceed? No
13. Is there anything else you would like to share? As a 26-year lessee of Grove Farm land, I want to make it clear: My 'ohana and I have never had any gathering or hunting rights.
    I am IN FAVOR of the consolidation and application S-2027-1.
14. Is there anyone else we should talk with about the projects or the Project Areas? No
15. Is there anything in this interview you would like us to omit from the summary? No

Interview with Boyd Gayagas

On August 28, 2026, a representative from Exploration Associates Limited (EAL) interviewed Mr. Boyd Gayagas. The interview was conducted via telephone and lasted one (1) hour and Sixty (60) minutes.

Mr. Boyd Gayagas previously served as Property Manager for Grove Farm and resided within the project area for approximately 14 years. Through his professional responsibilities and long-term residency, he developed extensive firsthand familiarity with the project area, including its terrain, access routes, land management activities, historic and contemporary land uses, and general environmental conditions.

In his capacity as Property Manager for Grove Farm, Boyd's responsibilities included accommodating request from cultural practitioners, lineal and cultural descendants, and to other individuals seeking access to wahi pana (sacred sites) and culturally significant places on Grove Farm lands. However, Boyd stated that during his tenure, he did not receive any request for cultural access specifically within this project area.

While Boyd's professional responsibilities provided him with firsthand experience regarding Grove Farm's process for accommodating cultural access, he did not personally observe or facilitate access associated with traditional or customary Native Hawaiian practices within the project area. His testimony should therefore not be interpreted as establishing that such practices did not or do not occur; rather, it documents that no requests for such access were brought to his attention during the period in which he managed the property.

Interview with Ryan Fu

On August 28, 2026, a representative from Exploration Associates Limited (EAL) interviewed Mr. Ryan Fu. The interview was conducted via telephone and lasted one (1) hour and thirty-three (33) minutes.

Raised in Hanama'ulu Mr. Ryan Fu has strong familial and community ties to the area. Ryan and his brother Russell have spent their lives in Hanama'ulu and possess extensive knowledge of the area, including its history, cultural landscape, and community.

Ryan recalled, during his childhood, his father was granted access by the Luna (Manager) of Lihu'e Plantation to gather 'opae (freshwater shrimp) from the irrigation ditches in the Hanama'ulu area. The gathering of 'opae was for family gatherings and celebrations. Ryan shared that his aunts would contact his father and ask him to gather 'opae for the occasion. Unfortunately, this is a practice that the family no longer continues.

Ryan shared that he later joined his brother, Russell, in raising and ranching cattle in the area. Ryan was careful to clarify that the lease with Grove Farm was held by Russell's wife, Tracie Fu, and Ryan himself was not the lessee. Through his involvement in the family's ranching activities, Ryan and his children spent additional time within the area and further developed familiarity with the land. While this experience contributes to Ryan's personal history and place-based familiarity with the area, he did not identify the ranching activity as a traditional or customary Native Hawaiian cultural practice.

Known as an avid hunter, Ryan participated in the hunting and eradication program facilitated by then-Grove Farm Property Manager Body Gayagas, which focused on controlling the wild pig population in the area. Through his participation in the program. Ryan spent considerable time on the land and developed an intimate familiarity with the surrounding landscape. His involvement extended beyond hunting and pig eradication, as he also assisted with clearing and maintaining trails throughout the area.

Ryan's experiences demonstrate a longstanding connection to the area and substantial firsthand knowledge of its terrain, access routes, natural environment, and historical uses. His knowledge is derived from having spent considerable time in the area through hunting, wild pig eradications efforts, trail clearing, ranching, and other activities. However, Ryan indicated that he does not have firsthand knowledge of traditional or customary Native Hawaiian cultural practices being conducted within this project area. Accordingly, his observations provide valuable place-based knowledge of the area but do not identify specific traditional or customary Native Hawaiian practices presently occurring within the proposed project area.

Interview with Will Pavao

On September 1, 2026, a representative from Exploration Associates Limited (EAL) interviewed Mr. Will Pavao. The interview was conducted via telephone and lasted sixty (60) minutes.

Will Pavao was born and raised in Kalaheo, Kaua'i, where ranching and the care of livestock were a familiar part of his upbringing. Will shared that his ʻohana has longstanding familial and community ties to ranching, and from an early age he was exposed to the responsibilities and practices associated with raising and caring for animals. Through these experiences, he developed firsthand knowledge of ranching and connection to Kaua'i's broader ranching community.

Will's familial experiences also provided him with exposure to Native Hawaiian cultural traditions and the relationship between cultural and ʻaina (land). His late sister, Kumu Hula Leina'ala Pavao Jardine, held a deep love and commitment to hula. Through her practice and perpetuation of hula, Will and the Pavao ʻohana had a unique opportunity to witness and understand the interconnected relationship that weaves together, ʻaina, ʻohana, cultural knowledge, and traditional Hawaiian cultural practices. These experiences contributed to Will's awareness of the importance of place and the ways in which cultural practices and ʻike (knowledge) are connected to sustained by the ʻaina.

For the past five years, Will has served as Property Manager for Grove Farm. Through his professional responsibilities, he has developed firsthand familiarity with lands under Grove Farm management, including property conditions, land uses, access routes, ranching activities, and the broader landscape, including areas relevant to the proposed project.

In his capacity as Property Manager for Grove Farm, and informed by his ʻohana's longstanding connection to hula and Native Hawaiian cultural traditions, Will indicated that he has not received any requests from cultural practitioners, lineal or cultural descendants, or other individuals seeking access to the proposed project area of the purpose of exercising Native Hawaiian traditional and customary practices.

Interview with Kurt Souza

Mr. Kurt Souza was consulted to provide information regarding his familiarity with Hanama'ulu and the surrounding project area. On September 2, 2026, a representative from Exploration Associates Limited (EAL) conducted an in-person interview with Mr. Kurt Souza and his wife Terry Souza. Kurt was born and raised in the Lihu'e, Kauai and currently lives in his childhood home with his wife.

Kurt has hunted throughout Kaua'i for much of his life and spent a considerable time traveling through the island's upland and undeveloped areas. His years of hunting have taken him across varied terrain, where he has traveled extensively by foot and utilized old cane haul roads, trails, and other established access routes to reach interior areas.

Through these experiences, Mr. Souza has encountered and become familiar with features that reflect the historical and cultural use of the land, including ancient lo'i terraces, historic sites, and artifacts encountered or exposed along the landscape. These firsthand experiences have provided Kurt with a practical familiarity with recognizing areas where evidence of pervious occupation and land use may be present.

Kurt has similarly traversed the proposed project area and surrounding lands by foot, including traveling and accessing old cane haul roads and routes within the broader area. Based upon his personal experiences and observations while hunting and traveling through these lands, Kurt state that he has not observed cultural sites, lo'i terraces, relics, artifacts, or other physical evidence of Native Hawaiian traditional or historical use within the boundaries of the proposed project area.

Kurt's observations are based upon his firsthand familiarity with the physical presence on the landscape and are presented as part of the broader cultural consultation. His observations do not constitute an archaeological determination regarding the presence or absence of historic properties or cultural resources.

Interview with Kanani Kagawa

On September 4, 2026, a representative from Exploration Associates Limited (EAL) interviewed Ms. Kanani Kagawa, formally known as Kanani Fu. The interview was conducted in person at her residence.

Like many individuals born and raised on Kaua'i, Kanani spent much of her life outdoors, developing place-based knowledge through sustained engagement with the island's lands and waters. Grounded in daily experiences, careful observation, and familiarity with the places where cultural activities occur, this knowledge reflects the intergenerational Native Hawaiian traditional practice of learning through director interaction with the natural and cultural environment. Her professional experiences further expanded her understanding of Kaua'i's communities, lands resources and the relationship that connect people to place. In her former roles as an Office of Hawaiian Affairs Community Liaison, Director of Makaweli Poi Mill, and County of Kaua'i Housing Director, Kanani gained experience working directly with community members and navigating issues involving land, resources, housing, and community well-being.

Following her parents' divorce, Kanani spent much of her childhood and teenage years between Anahola and Hanama'ulu. While living in Hanama'ulu with her father, Donald Kagawa, she learned to fish and gather from the land and sea. He taught her these practices, and together they regularly visited Ahukini Landing, Hanama'ulu Bay, and Kalapaki.

These activities were closely connected to Donald's work and family responsibilities. Although he was best known in the community as an attorney, he was also a licensed commercial fisherman. He gathered limu, including limu kohu and wawae'iole, which he sold to Big Save Stores. By accompanying and learning from her father, Kanani gained firsthand exposure to fishing, gathering, and the utilization of marine resources for both family subsistence and economic livelihood. These experiences provided Kanani with an understanding of the relationship between ʻohana, ʻaina, kai and the resources that sustained families within the community.

Although Kanani no longer personally gathers marine resources, the family's connection to fishing continues through the next generation. Her daughters continue to engage in fishing practices with their father, reflecting the continuation of fishing knowledge and practices within the ʻohana. Kanani's experiences with her father, together with the continuation of fishing among her daughters, demonstrate an intergenerational relationship with the marine environment and the transmission of knowledge and practices across generations.

Kanani described environmental changes she has observed over her lifetime, including the disappearance of Job's tears and wood-rose from areas where they were once abundant and the decline of prawns in the stream adjacent to her children's home on Laukona Street. The water flow changes informed her broader concern about the effects of continued development and land subdivision on the land and its resources. She noted that contacted Grove Farm and Dave Hinazumi about these concerns but received no response.

These observations also led Kanani to consider who will be responsible for stewarding the lands as ownership of the land use change. She understood Princess Victoria Kamamalu to have entrusted Grove Farm with stewardship of the lands and questioned who will assume that responsibility as portions are subdivided and sold. Kanani emphasized the need for long-term stewardship of the land and its resources and asked how the land and cultural resources will be protected and cared for through these changes. She requests that the landowner provide current, authoritative documentation sufficient to establish the landowner's legal interest in the property, including a current title report or title commitment, the recorded deed or other instrument conveying title, the current legal description and tax map key (TMK) designation, and documentation identifying any recorded liens, easements, covenants, restrictions, leases, or other encumbrance affecting the property.

Kanani further questioned what criteria will govern futures leases as the lands are subdivided and transferred to new landowners, including whether priority will be given to applicants committed to responsible land use, cultural preservation, and long-term stewardship, and whether cultural practitioners will have meaningful access to continue practicing, teaching, and cultivating traditional Hawaiian cultural practices. More broadly, she emphasized the need for clear requirements and accountability measures to protect the land for future generations and ensure that its cultural significance, including Native Hawaiian practices, knowledge, and relationships with the land, remains central to lease, development, and land-use decisions rather than being subordinated to economic interests.