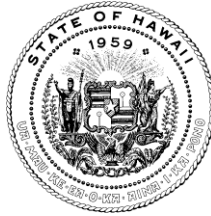


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**STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES**

STATE HISTORIC PRESERVATION DIVISION
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February 1, 2021

Michael Moule, P.E.
Chief, Engineering Division
County of Kaua'i
Department of Public Works
4444 Rice Street, Suite 255
Lihue, HI 96766
Email: mmoule@kauai.gov

IN REPLY REFER TO:
Project No.: 2020PR35121
Submission No.: 2020PR35121.001
Doc No.: 2102SH01
Archaeology

Dear Michael Moule:

**SUBJECT: National Historic Preservation Act (NHPA) Section 106 Review –
Request for Information and Concurrence with the Revised Area of Potential Effects
Po'ipū Road Multi-Modal Improvements
Federal Aid Project No. STP-0520(004)
Kōloa and Weliweli Ahupua'a, Kona District, Island of Kaua'i
TMK: (4) 2-6-004:041; (4) 2-6-008:013; (4) 2-6-008:018; (4) 2-6-008:021; (4) 2-6-008:022;
(4) 2-8-014:008; (4) 2-8-014:019; (4) 2-8-014:021; (4) 2-8-014:026; (4) 2-8-014:029;
(4) 2-8-014:018; (4) 2-6-015:006; (4) 2-6-015:026; (4) 2-8-015:082; (4) 2-8-022:004;
(4) 2-8-022:016**

The State Historic Preservation Division (SHPD) received a letter dated November 25, 2020 from the County of Kaua'i, Department of Public Works (Kaua'i County) on behalf of the Federal Highway Administration (FHWA) to request information and the State Historic Preservation Officer's (SHPO's) concurrence on the revised Area of Potential Effects (APE) for the Po'ipū Road Multi-Modal Improvements project on the island of Kaua'i. The SHPD received this submittal on December 31, 2020. This letter also addresses the HDOT consultation letter dated July 23, 2020 and received by SHPD on July 27, 2020 (SHPD Log No. 2020.01715).

The proposed Kaua'i County project, in coordination with the Hawai'i Department of Transportation (HDOT), will receive funding from the FHWA and has been determined a federal undertaking as defined in 36 CFR 800.16(y). The proposed project is subject to compliance with Section 106 of the NHPA and historic preservation review under Hawaii Revised Statutes (HRS) §6E-8. Pursuant to the Programmatic Delegation of Authority (May 2016), the FHWA has delegated Section 106 consultation to Kaua'i County and the HDOT.

The SHPD reviewed the APE as described in a letter from Kaua'i County dated April 13, 2020 and in a response letter dated May 12, 2020 (SHPD Log No. 2020.00826, Doc. No. 2005SH09) stated no objections to the APE as it was described. The APE is within the existing operational Po'ipū Road right-of-way, between Kōloa Road and approximately 275 feet east of Keleka Road. There are some areas where work will occur on parcels adjacent to the right-of-way, including minor grading work and intersection improvements at select locations. The revised APE includes an additional approximately 3.94 acres which brings the total APE acreage to approximately 45.64 acres.

According to the County of Kaua'i's letter, the construction staging areas will be located on the shoulder of Po'ipū Road from the edge of pavement to the right-of-way boundary. These areas are within both the APE and the road right-of-way and are further described as follows: on the mauka side of Po'ipū Road between Kiahuna Plantation Drive and Kīpuka Street, adjacent to TMK: (4) 2-8-014:029; (4) 2-8-014:026; (4) 2-8-014:021; (4) 2-8-014:019, on the western side of Po'ipū Road south of Pa'anau Road, adjacent to TMK: (4) 2-6-008:013; (4) 2-6-008:018; (4) 2-

6-08 :021; and (4) 2-6-008:022 and on the western side of Po'ipū Road south of Lopaka Paipa Boulevard adjacent to TMK: (4) 2-6-015:006 and (4) 2-6-015:026.

The revised APE is further described in Table 1 of the County of Kaua'i's letter. Based on the information received, the State Historic Preservation Officer (SHPO) has **no objections** to the revised APE as it is defined.

The County of Kaua'i has requested SHPD provide information on all eligible historic properties or cultural sites listed on the state inventory that are within the boundaries of the APE and that SHPD include the dimension of each site (length, width, and depth). SHPD notes it is the responsibility of the lead federal agency to conduct the efforts to identify historic properties, however SHPD staff conducted a search for historic properties recorded within the SHPD GIS database and has provided our findings below.

Based on a modest review of the SHPD GIS database the following sites and features were recorded and designated State Inventory of Historic Places (SIHP) numbers either within or near the APE:

- The Koloa Habitation and Agricultural Complex appears to have been assigned three SIHP numbers and two span across two TMKs. This includes SIHP 50-30-10-01934 within TMK: (4) 2-6-004:034 and SIHP 50-30-10-01949 and SIHP 50-30-10-01950 within TMK: (4) 2-6-015:009;
- SIHP 50-30-10-01906, recorded as Koloa Habitation with Associated Agricultural Features is within TMK: (4) 2-6-014:007;
- SIHP 50-30-10-01908, recorded as Koloa Historic [Historical] Habitation, is within TMK: (4) 2-6-014:005;
- SIHP 50-30-10-01911, recorded to be a Historical House Remnant likely associated with SIHP 50-30-10-01908-01910 within TMK: (4) 2-6-014:003;
- Directly adjacent to, or within, the right-of-way at the junction of Poi'pu Road and Koloa Road is SIHP 50-30-10-09302, described in the SHPD GIS database as a "massive square foundation at the 1841 sugar mill chimney built by Ladd and Co." and associated with the Old Koloa Sugar Mill within TMK: (4) 2-8-007:999;
- Directly south of the Kōloa Road right-of-way near Kahuna Plantation drive is SIHP 50-30-10-03086, a shelter site and rock mound(s) within TMK: (4) 2-8-014:018 and (4) 2-8-014:999; and
- SIHP 50-30-10-03195, the Weliweli Wall, recorded as a 1.4 meter wide wall, 1.0 meters high with an indeterminate length according to the SHPD GIS database, within TMK: (4) 2-8-027:018.

Please note the boundaries of these sites may not be known or accurately defined within the SHPD database. This may be for a number of different reasons which are not limited to the following: because additional research is needed to identify feature or site boundaries, because the data was gathered inaccurately or using antiquated methods, or because what is recorded in the GIS database is often displayed as only as a point on the landscape and therefore does not accurately reflect the known boundaries. Due to these reasons, further research is needed to identify features and sites within, or adjacent to, the APE. Additionally, the SHPD GIS database is not comprehensive and does not reflect all SIHP sites that have been recorded in Hawai'i.

To identify historic properties within the APE, SHPD recommends the County of Kaua'i and FHWA seek information from the public and consulting parties, which may include person(s) affiliated with Native Hawaiian Organizations, historic preservation groups, and civic clubs. Additionally, SHPD recommends the County of Kaua'i and FHWA conduct research by consulting the SHPD reports library in the HDOT office on Kaua'i, archival records, and the State and National Register of Historic Places.

The County of Kaua'i has also requested SHPD communicate any potential concerns relating to the project's potential effect(s) on historic properties. In order for the SHPD to respond to this request, the County of Kaua'i /FHWA will first need to have identified historic properties within the APE, determine if they are eligible for listing on the National Register of Historic Places, and provide a description of the historic property's characteristics that qualify it for listing, as well as how the proposed project will, or will not, impact the historic property. Upon receipt of this information the SHPO can provide a response to HDOT's inquiry. SHPD recommends expanding research efforts to nearby areas because sites, features, and historic properties that have been identified nearby, or adjacent to the ROW, may speak to the likelihood that subsurface archaeological historic properties would be present within the APE. Based on SHPD's preliminary findings, it appears the APE is within an area rich with cultural resources dating

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to the pre-contact era and up to the historical era; therefore SHPD notes concern that there may be high potential for historic properties, some not yet identified and documented, to be located within or directly adjacent to the APE.

If adequate records of previous efforts to identify and document architectural and/or archaeological historic properties within or closely nearby the APE do not exist, then additional efforts to identify historic properties may be needed. The SHPD highly recommends consulting with our office prior to conducting any efforts to identify historic properties by means of a field survey or subsurface testing to ensure efforts are agreed to be adequate. Upon identification of cultural, archaeological, and/or architectural resources it may be necessary for a person or persons qualified under the Secretary of the Interior's Professional Qualification Standards in a field relevant to the resource to assess the resource for integrity and significance.

The SHPD looks forward to continuing the Section 106 process for the proposed project.

The County of Kaua'i, HDOT, and the FHWA are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Please contact Stephanie Hacker, Historic Preservation Archaeologist IV, at Stephanie.Hacker@hawaii.gov or at (808) 692-8046 for matters regarding archaeological resources or this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Meesa Otani, FHWA (meesa.otani@dot.gov)
Troy Tanigawa, County of Kaua'i (publicworks@kauai.gov)
Christie Bagley, County of Kaua'i (cbagley@kauai.gov)
Justin Rush, HDOT (justin.se.rush@hawaii.gov)