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February 20, 2020

William A. Kucharski, Director  
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IN REPLY REFER TO:  
Log No.: 2019.00550  
Doc. No.: 2002SCH08  
Archaeology

David Albright, Manager  
Groundwater Protection Section  
Water Division  
U.S. Environmental Protection Agency  
Region IX  
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San Francisco, CA 94105  
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Dear Mr. Kucharski and Mr. Albright:

**SUBJECT: Chapter 6E-8 and National Historic Preservation Act Section 106 Review - Pāhala Wastewater Treatment Plant and Sewer System Project United States Environmental Protection Agency (EPA) Grant XP-96942401-6 Request for Concurrence with Effect Determination of "No Historic Properties Affected" Archaeological Inventory Survey Report Hionamoa, Pālima, and Pā'au'au 1 and 2 Ahupua'a, Ka'ū District, Island of Hawai'i TMK: (3) 9-6-002:016 por., and 018 por., (3) 9-6-005:036 por., and 044; (3) 9-6-016:041 por., and County of Hawai'i Rights-of-Way (ROW)**

This letter provides the State Historic Preservation Division's (SHPD's) review of the subject project and the draft report titled, *Archaeological Inventory Survey for the Pāhala Wastewater Treatment Plant and Sewer System Project, Hionamoa, Pālima, and Pā'au'au 1 and 2 Ahupua'a, Ka'ū District, Hawai'i Island, TMKs: [3] 9-6-002:016 por. and 018 por., 9-6-005:036 por. and 044, 9-6-016:041 por. and County of Hawai'i Right-of-Ways* (Bautista et al., March 2019; revised February 2020). On March 13, 2019 (Log No. 2019.00550), SHPD received a letter dated March 11, 2019 from the County of Hawaii Department of Environmental Management (DEM) submitting the draft archaeological inventory survey (AIS) report prepared by Cultural Surveys Hawaii, Inc. (CSH). SHPD previously requested an AIS be conducted and had approved the AIS testing strategy in a letter dated August 20, 2018 (Log No. 2018.00722, Doc. No. 1808JA02). SHPD subsequently received on October 9, 2019 a letter dated September 26, 2019 from the United States Environmental Protection Agency (EPA) requesting concurrence with an effect determination of "no historic properties affected" pursuant to 36 CFR 800.4(d) (October 9, 2019; Log No. 2019.02292), a letter dated October 9, 2019 from DEM requesting SHPD to review and accept the findings of the AIS report (October 15, 2019; Log No. 2019.02345) and, lastly, a DEM email on January 19, 2020 (Diane Noda [Deputy Director, DEM] to Susan Lebo [SHPD]) requesting concurrence with DEM's project effect determination of "no historic properties affected" pursuant to HAR §13-275-7.

This County of Hawaii DEM project is subject to review under the Hawaii Revised Statutes (HRS) Chapter 6E-8 historic preservation review process. Additionally, the project will use EPA Grant funding and funding from the State Revolving Funds which includes federal and state monies. The EPA has determined that the project is a federal undertaking as defined by 36 CFR 800.16(y) and is therefore subject to the National Historic Preservation Act (NHPA) Section 106 process.

The EPA's letter dated September 26, 2019, defines the area of potential effects (APE) as the entire project area where work will occur, as well as staging and laydown areas (Figure 1); provides a summary of consultation with SHPD, Native Hawaiian organizations, and other interested parties; a detailed description of the proposed project and copies of several earlier EPA and DEM letters sent to SHPD; and lastly, provides EPA's effect determination in accordance with 36 CFR §800.4(d). The EPA indicates that the proposed project includes closure of two Large Capacity Cesspools (LCCs); abandoning the existing wastewater collection system in place; acquiring the right to develop and use a 42.5-acre parcel currently owned by Kamehameha Schools and constructing a new wastewater treatment and disposal facility within a 14.9-acre portion of a 42.5-acre property; constructing a wastewater collection system, primarily within County road rights-of-way (ROWs) as well as within two short segments within easements; and collecting and conveying sanitary waste from the residential lots to the new treatment and disposal facility. Construction of the treatment and disposal facility will involve grading, excavating, and fill activities. The proposed wastewater collection system will be located within 8 public streets: Maile, 'Ilima, Huapala, Hinano, Hala, Puahala, Kaimani, and Pikake. The system will consist of approximately 12,150 linear feet of PVC piping, ranging from 8-inch diameter to 16-inch diameter. Construction of the new collection system will require trenching at least 6 feet deep, while the closure of the two LCCs and existing collection system will require minor earthwork.

The AIS (Bautista et al., March 2019) indicates that the HRS 6E-8 project area consists of 29.3 acres within the 57.7-acre APE defined by the EPA. Specifically, it consists of locations 1-5 of the 6 locations comprising the APE and described below:

1. The 14.9-acre Pāhala wastewater treatment plant (WWTP) site, including all project-related staging;
2. An approximately 1,500-ft-long by 25-ft-wide utility easement (about 0.94 acre) located entirely within TMK: (3) 9-6-002:018 to connect the collection system line and other utilities to the Pāhala WWTP;
3. The path of the new sewer collection lines, to be located within the 22- to 24-ft wide travel lanes of selected County streets;
4. Sewer line easements of similar width (22-24 ft) through TMK: (3) 9-6-005:036 and 044 connecting the collection lines to the proposed Pāhala WWTP site;
5. The existing LCC 1 and 2 locales within TMK: (3) 9-6-002:016 and (3) 9-6-016:041 por., respectively, and an approximately 100-m (328-ft) long by 15-m (49-ft) wide corridor along the existing sewer line easement in TMK: (3) 9-6-002:016 between Maile Street and LCC 1; and
6. Numerous single-family residential/other properties with existing sewer laterals, some of which may need to be replaced/repared/rehabilitated by the County at some future date.

The AIS (Bautista et al., March 2019) fieldwork involved a 100% pedestrian survey with field crew spaced 3-5 meters apart depending upon the density of vegetation; no survey was conducted for LLC 2 as access was not granted to this location on private property. The report indicates ground visibility was very good throughout most of the inspection area. Subsurface testing included mechanical excavations of seven test trenches measuring approximately 5 m long and 1 m wide with an average depth of 1.6 m. No subsurface features or deposits were exposed during AIS testing.

The AIS documented two newly identified historic properties: the historic Wood Valley Road/Coastal Road corridor (SIHP # 50-10-69-31088), and the historic Volcano Road corridor (SIHP # 50-10-69-31089). The report assessed both Sites 31088 and 31089 as significant under Criterion d, pursuant to HAR §13-275-6. Furthermore, the report recommends SIHP # 50-10-69-31099 and SIHP # 50-10-69-31089 as not eligible for inclusion on the National Register of Historic Places, as none of the constructed elements of the subject portions of the original roadway are evident today, and these portions of the historic properties lack integrity apart from their location. The report recommends a project effect determination of "no historic properties affected" and archaeological monitoring during all construction activities for the proposed project.

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In their letter dated September 26, 2019 (Log No. 2019.02292), the EPA made a project effect determination of “no historic properties affected” pursuant to 36 CFR 800.4(d) and requested concurrence. **The State Historic Preservation Officer (SHPO) concurs** with the EPA’s determination of “no historic properties affected.” The two historic properties identified in the APE, SIHP # 50-10-693108 (historic Wood Valley Road/Coastal Road) and SIHP # 50-10-69-31089 (historic Volcano Road corridor) exhibit integrity of location only and were evaluated as not eligible for inclusion in the National Register of Historic Places. The proposed project will not adversely affect the location of these two roadways.

On February 19, 2020, DEM (Diane Noda, Deputy Director, DEM, email correspondence to Susan Lebo, Archaeology Branch Chief, SHPD), requested SHPD’s concurrence with DEM’s project effect determination of “No historic properties affected” pursuant to HAR §13-275-7(a)(1), and with DEM’s stipulation that the project shall proceed under archaeological monitoring for identification purposes as a precautionary measure due to the cultural sensitivity of the area and the proximity of several significant historic properties to the project area. In addition to the two historic properties within the project area, DEM indicates that the proposed project is within the “Pāhala Historic District” (SIHP 50-10-69-07362), and three significant historic properties are near the project area: (1) a lava tube system (SIHP 50-10-69-27570) with some cultural modifications beneath Pāhala town; (2) Ka’ū and Pāhala Elementary School (SIHP 50-10-69-07522), a National Register-eligible historic property; and (3) the Hawai’i Belt Road (SIHP 50-10-47-30187), a National Register-eligible historic property south of the project area.

Based on the AIS findings, **SHPD concurs** with DEM’s HRS 6E project effect determination of “No historic properties affected” and with DEM’s stipulation of archaeological monitoring for identification purposes.

The report meets the requirements of HAR §13-276-5 and the Secretary of Interior’s Standards for Archaeological Documentation. **It is accepted.** Please send two hard copies of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version of the report, to the Kapolei Office attention SHPD Library. Please also provide a PDF copy of the report to [Lehua.K.Soareshawaii.gov](mailto:Lehua.K.Soareshawaii.gov).

**The SHPD looks forward to** discussing the provisions of the archaeological monitoring plan (AMP) with DEM and their archaeological consultant and, subsequently to receiving for review and acceptance an AMP meeting the requirements of HAR §13-279-4 prior to project work commencing.

**SHPD shall notify DEM when** the AMP is reviewed and accepted and project work may commence.

The EPA and DEM 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 Samantha C. Hemenway, Historic Preservation Archaeologist III, at [Samantha.Cragen@hawaii.gov](mailto:Samantha.Cragen@hawaii.gov) or at (808) 692-8011 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

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