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December 28, 2009

Patrick McCoy, Ph. D.
Principal Investigator
Pacific Consulting Services, Inc.
720 Iwilei Road, Suite 424
Honolulu, Hawai'i 96817

LOG NO: 2009.4076
DOC NO: 0912TD22
Archaeology

Dear Dr. McCoy:

Subject: **Chapter 6E-7 Historic Preservation Review –
Draft Archaeological Inventory Survey of the Astronomy Precinct, Mauna Kea
Science Reserve, Ka`ohe Ahupua`a, Hāmākua District, Island of Hawai`i
TMK: (3) 4-4-15: 009 (por.)**

Thank you for submitted the draft report titled *Archaeological Inventory Survey of the Astronomy Precinct in the Mauna Kea Science Reserve, Ka`ohe Ahupua`a, Hāmākua District, Hawai`i Island, Hawai`i*. TMK (3) 4-4-15: 09 (por.); McCoy, Neese and Clark, November 2009. We received this submittal November 9, 2009, and we apologize for the delay in returning our comments.

The report presents the findings of a systematic pedestrian survey conducted of the 525-acre astronomy precinct August 29-September 6, 2005. Additional testing fieldwork was conducted August 25, 2008. As indicated in the report, this inventory survey follows a 1982 reconnaissance survey that included all of the astronomy precinct, and fieldwork within the precinct by SHPD in 1995. Four of the six historic properties reported here are previously identified. The six sites identified within the precinct include five shrines (SIHP Sites 50-10-23-16166, 16167, 16169, 16172 and 21447) and one terrace, function unknown (SIHP Site 50-10-23-21449). Subsurface testing was conducted at Site 21449; however no cultural material or information was collected to aid in determining age or function of the terrace.

A comprehensive and thorough background discussion of the project area setting and previous archaeological work within the astronomy precinct and larger Science Reserve and NAR areas is presented, with good maps. A discussion of the findings includes consideration of two hypotheses which attempt to explain the occurrence and patterning of shrines in the mountain summit region. We concur with the assessment that all the identified sites are contributing properties within the Mauna Kea Summit Region Historic District (SIHP Site 50-10-23-26869), which is significant under HAR §13-275-6 Criteria a, b, c, d and e. The recommended treatment for these sites is preservation.

Seven "find spots" comprised of stacked rocks or upright stones that appear to be modern are also documented and discussed in the report. Six of these finds were newly identified in 2005, suggesting an increase in the number of constructions as the visitor count increases. The report references the recently completed CRMP for the Mauna Kea Management Areas, which requires that the Office of Mauna Kea Management develop a policy for dealing with the construction of new shrines and stacked rock features. We believe that the analysis of findings in this report provides a good model for the development of a policy that could follow a historically accurate reflection of traditional Hawaiian cultural values regarding the placement of shrines and rock tokens in the summit region. As indicated in the report, there is a marked decrease and near absence of human modifications within the Kūkahau`ula Summit TCP area,

reflecting traditional concepts of appropriate behavior regarding this sacred space that was "...adhered to and strictly enforced in the more remote past" (page 6-5).

The report is accepted pursuant to HAR §13-276. Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention of "SHPD Library". If you have any questions or wish to further discuss the conclusion of this letter, please contact Theresa Donham at (808) 933-7653.

Aloha,

A handwritten signature in cursive script that reads "Nancy A. McMahon". The signature is written in black ink and is positioned above the typed name.

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