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DEPARTMENT OF LAND AND NATURAL RESOURCES

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

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May 26, 2010

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

LOG NO: 2010.0066  
DOC NO: 1005TD05  
Archaeology

Dear Dr. McCoy:

Subject: **Chapter 6E-7 Historic Preservation Review –  
Archaeological Inventory Survey Report, Mauna Science Reserve (11,288 Acres)  
Ka'ohē Ahupua'a, Hāmakua District, Island of Hawai'i  
TMK: (3) 4-4-015: 009 (por.)**

Thank you for submitting the draft report entitled *Archaeological Inventory Survey of the Mauna Kea Science Reserve, , Ka'ohē Ahupua'a, Hāmakua District, Island of Hawai'i, TMK: (3)4-4-015: 09 (por.)* (P. C. McCoy and R.C. Neese, January 2010). We received this submittal January 21, 2010 and we apologize for the delay in returning our comments.

The report is based on inventory survey work conducted between 2005 and 2009 (20 weeks of field work), and was prepared at the request of the Office of Mauna Kea Management, University of Hawai'i at Hilo, in connection with the 2000 Master Plan and the 2009 Comprehensive Management Plan (CMP) for the Science Reserve. The survey was a continuation of DLNR-SHPD reconnaissance efforts within the Science Reserve that occurred in 1982, 1984, 1995, 1997 and 1999. The current survey was not triggered by a specific permit; however, it provides the baseline data for the Cultural Resources Management Plan (CRMP), a Sub-Plan of the 2009 CMP, which was designed to ensure that the Office of Mauna Kea Management is in compliance with the conditions of its 1968 lease agreement with DLNR.

The report consists of two volumes: Volume 1 contains the background, summary, analysis and recommendation sections (353 pages) and thirteen appendices. Volume 2 contains site descriptions organized by functional group (588 pages), and appended maps. A total of 263 historic properties are described and analyzed, 97 of which were previously recorded. In-depth analysis is included for the shrines (173 identified) and for artifacts collected from adze manufacturing workshops. Controlled subsurface testing was conducted at two sites (Sites 21449 and 26253), and one radiocarbon date (AD 1420-1480) was obtained from charred wood. In addition, information is provided for 339 find spots, which are assumed to be less than 50 years in age. Some of the find spots could not be definitely dated and could possibly be over 50 years in age. All of the identified sites are located within the Mauna Kea Summit Region Historic District (SIHP 50-10-23-26869), which is significant under all five of the Hawai'i Register of Historic Places and Hawai'i Administrative Rule (§13-275) Criteria; and under all four of the National Register Criteria.

The report includes full discussions of previous archaeological work in and around the project area, environmental features, and a summary of the survey findings. The data analysis section is very well

done, and includes theoretical concerns, detailed typology development, and clear data tables and graphs. The shrine analysis considers attributes of the component parts of a shrine (uprights, pavement, court); shrine location and orientation; and topographic setting. Artifact analysis includes metric and non-metric attribute analysis of adze performs and hammerstones, based on measurements taken in the field and in the laboratory. Findings and conclusions are compared with other interpretations of the technology and social framework of adze production and distribution. Site descriptions are consistent and adequate maps and photographs are included.

We concur with the significance evaluation that all the identified sites are contributing properties within the Mauna Kea Summit Region Historic District because they were present during the period of significance, they possess historic integrity and they independently meet one or more of the National and Hawai'i Register significance criteria. As noted above, the Mauna Kea Summit Region Historic District meets all four National Register Criteria and all five Hawai'i Register Criteria.

All of the identified sites within the Mauna Kea Science Reserve will be preserved. Twenty-six recommendations are included in the report, most of which are measures that will directly or indirectly ensure that the sites are preserved. These recommendations include provisions for consultation, prohibitions for off-road vehicular traffic, preparation and implementation of a burial treatment plan, preparation and implementation of a monitoring program, a staff training program, an education and interpretation program, a collection curation program, a GIS database, and other measures that are included in the Cultural Resources Management Plan (CRMP) for the Science Reserve. We concur with these recommendations and wish to add that we would like to work with the Office of Mauna Kea Management and DLNR to complete the State and National Register nomination paperwork for the Summit Region Historic District. We also have one question regarding the status is the Mauna Kea Adze Quarry National Historic Landmark (see attachment).

The report exceeds minimal requirements for inventory survey reports as found in Hawaii Administrative Rule §13-276 and is accepted. Please address the attached comments and send revised hardcopy sections of the document to the Hilo office, along with a cover sheet and title page marked FINAL. Please send one hard copy of the revised report, 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,



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

### ATTACHMENT

Comments and Questions: *Archaeological Inventory Survey of the Mauna Kea Science Reserve, , Ka'ohē Ahupua'a, Hāmākua District, Island of Hawai'i, TMK: (3)4-4-015: 09 (por.)* (P. C. McCoy and R.C. Neese, January 2010).

1. A complete reference check was not conducted during this review; however a sample indicates that a number of citations are missing from Section 10. Examples include the following:
  - Page 4-4: Johnson 2007, Pauketat 2004, Kirch 1984
  - Page 5-5: Lewontin 1994 – is this 1994a or 1994b as listed in Section 10?
  - Page 5-8: Hommon 1980b (there is no Hommon 1980a or 1980b in Section 10)
  - Page 5-15: Schaafsma 1989
  - Page 5-17: Cowgill 1989 – is this 1989a or 1989b? Grover 1974, 1979
  - Page 5-22: Reinman & Pantaleo 1998
  - Page 5-33: McCallister 1930 (1933 listed in Section 10)
  - Page 5-41: McCoy and Nees 2007 (2006 listed in Section 10)
  - Page 5-56: Menzies 1920
  - Page 6-1: Stern 1990 is incomplete (highlighted in Section 10)
  - Page 6-2: Gould 2000
  - Page 6-20: Cox and Davenport 1988
  - Page 6-30: Bringham 1908 (1902 listed in Section 10)
  - Page 6-54: Bayman and Moniz 2001 (2000 listed in Section 10)
  - Page 6-59: Isaac 1972
  - Page 6-61: Phagan 1972
  - Page 6-86: Abbott 1992, Van Riper 1990
  - Page 6-87: Mills and Lunblat 2006 (2008 listed in Section 10), Wilson 1997
  - Page 6-94: Figure citation Porter 1979 – is this a, b or c?
  - Page 7-13: Geertz 1996
  - Page 7-14: Colpe 1987
  - Page 7-17: Douglas 1975
  - Page 7-21: Ortner 1989
  - Page 7-30: Clark 1995, Renfrew 1975
  - Page 7-42: Welch 1991
  - Page 7-58: Gell 1998 (is this supposed to be Gill?)
  - Page 7-59: Firth 1970
  - Page 8-1: Bowdler 1977
2. SIHP Sites 27579 – 27618 were assigned numbers in December 2009. Our records show that the UTM coordinates for these sites were not submitted with the site number requests. This information is not in the report. Please resend the site request spreadsheet (excel) with the UTM data via email to [Theresa.K.Donham@hawaii.gov](mailto:Theresa.K.Donham@hawaii.gov). UTM data was not required at the time site numbers were assigned in 2007 (Sites 26178-26256); however, if this data is already in an electronic file, we would appreciate if you could send it as well.
3. In Sections 6, Vol. 1 and Section 3, Vol. 2, it is stated that the previously unrecorded Pohakuloa Gulch Adze Quarry and Workshop Complex is considered to be within the Mauna Kea Adze Quarry Complex, which is a national historic landmark. It appears that the boundaries of the Mauna Kea Adze Quarry (and the information on file in the HRHP and NRHP) may need to be updated. If you agree, we request that you include a recommendation for the update in Section 9.
4. The map provided for Site 27606 (Vol. 2, page 3-99) is labeled “Showing Locations of Site Components”. According to the site description, there are four components. The map shows only one (the rockshelter). Please include locations of the terrace, the wall remnant and the workshop on the site map.

5. In Section 4, Vol. 2, it is noted that some of the burial/possible burial sites were not mapped or photographed due to adverse weather conditions. Please include a statement in Item 3 of the Recommendations (Section 9, Vol. 1) that includes full documentation of these burial sites as part of the BTP preparation. The need for the BTP should be emphasized, given the presence of exposed human remains at sites on Pu`u Makanaka.