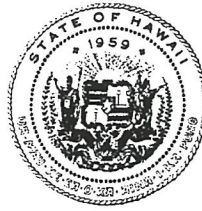


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December 1, 2010

Log No. 2010.3499
Doc No. 1012TD02

MEMORANDUM

TO: Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

FROM: Theresa K. Donham, Acting Archaeology Branch Chief 

SUBJECT: **Chapter 6E-8 Historic Preservation Review -
Conservation District Use Application, Thirty-Meter Telescope (HA-3568)
Ka'ohē Ahupua'a, Hāmākua District, Island of Hawai'i
TMK: (3) 4-4-015:009**

Thank you for requesting comments on the subject application, which we received October 22, 2010. The proposed project will involve four locations within the Conservation District: an approximately five-acre observatory site (13N); an access road connecting the telescope site with existing roads; a batch plant staging area; and transformer upgrades at the Hale Pōhaku Substation.

Project-specific archaeological inventory survey reports have been completed for this project (Hammatt 2009), and drafts were reviewed by our office in 2009 (*Log 2009.2487, Doc 0907TD32; Log 2009.1564, Doc 0910TD14*). Subsequent to our review, revised reports have been submitted and are attached to the FEIS. In addition, the archaeological inventory survey of the Mauna Kea Science Reserve (McCoy et al. 2009) was completed and accepted by our office in 2009 (*Log 2009.4076, Doc 0912TD22*). We therefore believe that the information provided in the application regarding archaeological sites in the vicinity of the project area locations is correct and accurate.

We have previously reviewed and commented on the draft EIS for this project (memos dated June 26, 2009 and October 5, 2009; *Log 2009.1470, Doc 0910TD07*). In our prior comments, we indicated that the DEIS did not address or fully recognize the significance of the Mauna Kea Summit Region Historic District or the Kūkahau'ula TCP, both of which will be affected by the project. We note that the application documents recognize the Summit Region Historic District and the Kūkahau'ula TCP area, and mitigation measures are proposed that address impacts to cultural practices as well as visual and material impacts to the summit region. Proposed mitigation measures address project-specific as well as cumulative affects to the District and the TCP that have resulted from multiple observatories at the summit.

Attached to the application document is a Draft Historic Preservation Mitigation Plan (Appendix A), which summarizes the project area locations, known historic properties in the vicinity, and proposed direct and indirect mitigation measures for the project; general descriptions of the proposed archaeological and cultural monitoring are also included. The measures outlined in this plan are scattered throughout the CDUA application; we therefore request that the Appendix A Mitigation Plan be

Sam Lemmo
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specifically referenced in the approval correspondence to ensure that all of the proposed mitigation measures for impacts to historic properties are included as conditions for permit approval.

The Office of Mauna Kea Management (OMKM) has been in contact with our office for consultation regarding this project, and SHPD staff has conducted a site visit to Mauna Kea in connection with the TMT access road. We appreciate that OMKM has made the effort to include our office in meaningful consultation regarding project impacts and mitigation measures while the plans were being prepared.

We have no further comments at this time, with the assumption that the project will follow the Historic Preservation Mitigation Plan and other pertinent historic preservation planning documents associated with the Mauna Kea Science Reserve, such as the Cultural Resources Management Plan that is attached to the Comprehensive Management Plan. We look forward to receiving an Archaeological Monitoring Plan for review and approval prior to the onset of project construction.

Please contact me at (808-933-7653) or at Theresa.K.Donham@hawaii.gov if you have any questions regarding this memo.