



UNIVERSITY  
OF HAWAII  
HILO

Nov. 7, 2023

Hawai'i Historic Places Review Board  
601 Kamokila Boulevard, Suite 555  
Kapolei, Hawaii 96707

Re: Traditional Cultural Place/Property Nomination for the summit region of Mauna Kea

Aloha HPRB members:

I am a former board member of the HPRB, director of the Heritage Management MA program at UH Hilo, an anthropology professor at UH Hilo for the last 26 years who regularly teaches classes in cultural resource management, and a former staff member of a State Historic Preservation Office (SHPO), the Massachusetts Historical Commission. Much of my own research over the last two decades has been on the upper slopes of Mauna Kea through investigations of the Mauna Kea Adze Quarry in the Ka'oho district and nineteenth century ranching sites in the Humu'ula district. I write to you today in full support of KAHEA's Traditional Cultural Place designation for the upper slopes of Mauna Kea with a boundary at 6500 ft. asl. A unifying justification for this TCP boundary is the existence of all these summit regions within the "Wao akua" (realm of the gods) in Hawaiian cosmology, or the region above the dense forests that occupy the mid-slopes of Mauna Kea.

Although TCP nominations have been relatively uncommon in Hawai'i compared with historic architecture (usually nominated under criteria A, and/or B, and C) and archaeological sites (usually nominated under Criterion D), the National Park Service and the Advisory Council on Historic Preservation provide specific guidelines for evaluating the suitability of traditional cultural place nominations (which can often include all criteria A through D, as the Mauna Kea summit region does). The main guidelines are found in National Register Bulletin 38 "Guidelines for Evaluating and Documenting Traditional Cultural Places," first published in 1990. In 1992 the guidelines were revised to encourage more consideration of indigenous sacred areas with *intangible characteristics* such as Mauna Kea. Beginning in 2014 and continuing to the present, the NPS has been circulating a revised draft of the guidelines that provides clearer language and more case-study examples of just what should be considered a TCP, with the most current draft in circulation from the NPS being dated to October 27, 2022. While many HPRB members may be used to boundary justifications for historic properties drawn around tangible human constructs, TCP boundaries are instead justified by patterns of traditional and customary practices by living communities, and tend to be much more expansive.

**SOCIAL SCIENCES**

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Both the 1992 revisions to Bulletin 38 and the new draft bulletin language support broad boundary justifications through the case examples they provide. These examples include the Helkau Historic District in northern California where topographic lines were used to define a broad area used for the collection of medicinal material. In Wyoming, Medicine Wheel/Medicine Mountain NHL consists of a single tangible medicine wheel feature, with the surrounding 4,080 acres of storied natural parts of the landscape included in the boundaries. In southern California, Kuchamaa (Tecate Peak) is a sacred mountain to the Kumeyaay, and boundaries to the TCP are drawn at the 3,000 ft. contour (see NPS Bulletin entitled "Defining Boundaries for National Register Properties" for the last example).

The 2022 UH recommendations for the Mauna Kea summit region limit TCP designations to 3 circumscribed portions of the summit region (sites 50-10-23-21438 [Kūkahau'ula], 50-1-23-21439 [Pu'u Līlinoe], and 50-1-23-21440 [Lake Waiau]). In my opinion and based on Bulletin 38 and the NPS bulletin "Defining Boundaries for National Register Properties," these circumscribed boundaries exclude many aspects of cultural practice on the upper mountain from consideration of traditional and customary practices, including burial, astronomical observation, umbilical cord placement, and various ongoing ritual practice, all of which are amply covered in the nomination before you, and that justify the boundaries proposed in the current nomination.

If you have any questions or comments, please feel free to contact me directly on my cell at 808 937-4417, or by email at [millsp@hawaii.edu](mailto:millsp@hawaii.edu).

Sincerely,

A handwritten signature in blue ink that reads "Peter R. Mills". The signature is fluid and cursive, with the first name "Peter" and last name "Mills" clearly legible.

Peter R. Mills, Ph.D.,  
Professor of Anthropology  
University of Hawai'i at Hilo

Cc: Alan Downer, SHPD Director:  
Mary Kodama: [mary.kodama@hawaii.gov](mailto:mary.kodama@hawaii.gov)

[EXTERNAL] Maunakea our Historical/Water Source

Eileen Rodrigues

Tue 11/7/2023 5:13 PM

To:Kodama, Mary ML

*Aloha kākou, My name is Eileen Rodrigues and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places."*

Sent from my iPhone

**[EXTERNAL] Mauna Kea**

Lauralee Baoy

Tue 11/7/2023 7:10 PM

To:Kodama, Mary ML

*Aloha Mary,*

*My name is Lauralee Dice, I am Native Hawaiian, born and raised on the Island of Maui, with direct familial paternal and maternal lineage on Hawaii Island. I am writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.*

Mahalo,

Lauralee Dice

1479 Thurston Avenue #201

Honolulu, HI 96822

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**From:** Jaron Hurlbut  
**Sent:** Tuesday, November 7, 2023 4:11 PM  
**To:** Downer, Alan S  
**Subject:** [EXTERNAL] Please protect

*Aloha kākou, My name is Jaron Hurlbut and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places."*

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**From:** Miriam Paisner  
**Sent:** Wednesday, November 8, 2023 11:11 AM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Cc:** Miriam Paisner  
**Subject:** [EXTERNAL] Mauna Kea

i do not live on the Islands but i used to; i fully believe in the history of the kanaka maoli and their ancestry; Mauna kea is to be saved forever as a place of history, culture and indigenous worship; it is part of ancient Hawai'i and so it Must remain so.

stop messing around with telescopes up there; we do NOT need more of them

aloha  
sincerely  
m. Pumehana paisner  
boulder, colorado

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**From:** Taylor Campbell  
**Sent:** Wednesday, November 8, 2023 8:59 AM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Mauna Kea as a TCP

*Aloha kākou, My name is Taylor Campbell and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.*

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**From:** Laudan Chaffin  
**Sent:** Wednesday, November 8, 2023 8:04 AM  
**To:** Kodama, Mary ML; Downer, Alan S  
**Subject:** [EXTERNAL] Nominate Mauna Kea as a Cultural Property

Aloha kākou,

My name is Laudan and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue.

Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.

Thank you,

--  
Laudan Chaffin



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**From:** Chai Blair-Stahn  
**Sent:** Wednesday, November 8, 2023 6:53 AM  
**To:** Kodama, Mary ML; Downer, Alan S  
**Subject:** [EXTERNAL] Designate Mauna Kea as Traditional Cultural Property

*Aloha kākou,*

*My name is Chai Blair-Stahn, and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.*

*Mahalo for your consideration,  
Chai*

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**From:** Tonee Burley  
**Sent:** Wednesday, November 8, 2023 5:26 AM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] TCP nomination Testimony

Aloha kākou, My name is Tonee Burley and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places. Mahalo.

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**From:** Kainoa Wilson  
**Sent:** Tuesday, November 7, 2023 9:55 PM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Mauna Kea

*Aloha kākou, My name is Kainoa Wilson and I am writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today, for many generations past and, with your help, for many of our future generations. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places. When you visit Mauna Kea with an open heart and an open mind you can feel the mana that the Mauna possesses, the sense of peace and great power that resides there. Please do not take this from our Kanaka Maoli.*

*Mahalo*

*Kainoa Wilson*

*Honokohau, Maui*

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**From:** Ho'oululāhui Erika Perry  
**Sent:** Tuesday, November 7, 2023 6:41 PM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Nominate Mauna Kea as a Traditional and Cultural Property on the State and National Registers of Historic Places

Aloha Director Alan Downer & Mary Kodama,

My name is Ho'oululāhui Erika Perry and I'm writing in support of the effort to nominate Mauna Kea (Mauna Awākea) as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.

Mālama pono,

Ho'oululāhui Erika Perry

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**From:** Karuna Hub for the Heart  
**Sent:** Tuesday, November 7, 2023 6:27 PM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Mauna Kea: Traditional and Cultural Property

Aloha kākou, My name is Kathryn Wiese and I live on the Hamakua Coast, near Kalopa State Park on the Big Island.

I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.

Mahalo nui loa,

Kathryn Wiese

Honokaa, HI 96727

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**From:** Luana Keakealani  
**Sent:** Tuesday, November 7, 2023 5:15 PM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Mauna Kea as TCP

*Aloha kākou,*

*My name is Luana Keakealani and I am writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.*

Mahalo,

Luana Keakealani, LCSW  
MSW Social Work  
University of Southern California  
BA Cultural Anthropology  
Indiana University

[Sent from Yahoo Mail for iPhone](#)

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**From:** Ikaika Torres  
**Sent:** Wednesday, November 8, 2023 12:36 PM  
**To:** Downer, Alan S; Kodama, Mary ML  
**Subject:** [EXTERNAL] Mauna Kea

*Aloha kākou, My name is Ikaika Torres and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.*

*Mahalo,*

--

Ikaika Torres  
he / they

“Aloha kākou, My name is Robert Cheshire and I'm writing in support of the effort to nominate Mauna Kea as a Traditional and Cultural Property. Mauna Kea is a sacred wahi pana, treasured by Kānaka Maoli cultural practitioners, today and for many generations past. Formal recognition of Mauna Kea as a TCP is long overdue. Please nominate Mauna Kea as a Traditional and Cultural Property on the state and national Registers of Historic Places.”

Sincerely

Robert Cheshire  
Kailua Kona, HI