

8 November 2006

Sea Mountain Five
6 Marin Lane
Honolulu, HI 96817

Re: Draft Environmental Impact Statement, Sea Mountain at Punalu`u

Sirs:

I have reviewed the DEIS referenced above. I have a multitude of concerns regarding the wisdom of developing such a large-scale project in what is a rural community, from its adverse impacts on the natural and cultural environment, to its direct and indirect effects on existing infrastructure. As is too typical with DEIS documents, this study seems to focus on token mitigation measures for direct adverse effects, and avoids much consideration of negative indirect impacts. Despite these overall objections to the scope of the report, I will address specific concerns that I have with cultural and archaeological sections of the DEIS.

Appendix A is under-scoped. This critique is not aimed at your archaeological consultants, Cultural Surveys Hawaii, Inc. (hereinafter referred to as "CSH"). They have followed a commonly employed inventory survey methodology. The problem lies with the ability of the inventory, as scoped, to identify the full range of historic properties and burial sites within the project footprint prior to the initiation of the massive development project. HAR Title 13, Chapter 276-2 defines an archaeological inventory survey as "the process of identifying and documenting the archaeological historic properties and burial sites in a delineated area, gathering sufficient information to evaluate significance of the historic properties and burial sites, and compiling the information into a written report for review and acceptance by the department [SHPD]." Further information regarding the process of the field survey states, "The presence or absence of subsurface sites shall be evaluated for areas which have no visible historic properties. This evaluation shall include findings of test excavations, if deemed necessary, or a conclusion, with supportive documentation, that *historic properties are not anticipated to be present*" (emphasis added, HAR 13-276-4[b]).

Instead of following 13-276-4(b), the DEIS states in multiple contexts that other historic properties and burials are expected to be encountered in the construction phase of the project. This is an implicit acknowledgement that buried sites exist that have not been identified by the initial inventory survey, and in fact could not have been located given the survey methodology employed. CSH conducted a surface pedestrian survey and "limited subsurface testing" in known archaeological sites, but the methodology did not incorporate any subsurface investigations or remote-sensing studies to identify other buried archaeological sites and human burials. This strategy follows in the ignominious path of the early phases of the Hokuli`a project in Kona. If we are to learn from the history of large development projects in rural areas of the state, one lesson should be that it is in everyone's best interest to intensify the scope of the archaeological inventory

survey before any potential development begins. Geomorphological issues in the Punalu`u area include historical era tsunamis and the construction of golf-course greens (and other large scale earth-moving events), that most likely buried many significant sites within the 430-acre project area. The scope of the inventory survey seems to leave these sites and burials to be identified during the construction phase, when preservation in place becomes a less viable option.

I request that in order to comply with the intent of Chapter 6E HRS and the specific administrative rules outlined in 13-276, that a much greater effort be made to identify buried archaeological deposits and burials in the 430-acre project area. This should include a subsurface testing strategy and remote sensing surveys that can better assess the presence or absence of buried cultural deposits.

Secondly, I object to the opening statement in the section dealing with cultural impacts (page 5-23) that “A probable positive impact of the project development would be the provision of a cultural center to provide a place to showcase the history and culture of the area.” This section of the report should instead begin by recognizing that the project will have significant negative impacts on traditional cultural practices and cultural landscapes. *Punalu`u, as it is now, IS a cultural center that provides a place to showcase the history and culture of the area.* As such, Punalu`u is a “traditional cultural property” as defined by 13-275 HAR as

any historic property associated with the traditional practices and beliefs of an ethnic community or members of that community for more than fifty years. These traditions shall be founded in an ethnic community’s history and contribute to maintaining the ethnic community’s cultural identity. Traditional associations are those demonstrating a continuity of practice or belief until [the] present or those documented in historical source materials, or both.

Despite your profit incentives for developing a large-scale resort, it is most arrogant for the DEIS to suggest that the development would result in a probable positive impact on the history and culture of the area. The cultural center would be a token mitigation measure to lessen the adverse effects your project would cause to this highly significant traditional cultural property. It should not be represented as a positive impact, nor should it be implied that those who object to the development on the grounds that it adversely affects this traditional cultural property are standing in the way of community improvement.

I look forward to these comments being addressed with something less dismissive than a “thank you for your comments” reply.

Regards,

Peter R. Mills, Ph.D.

CC: Hawaii County Planning Dept.
Melanie Chinen, SHPD