

JOHN WAIHEE
GOVERNOR OF HAWAII



KEITH W. AHUE, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTIES
JOHN P. KEPPELER, II
DONAL L. HANAIKE

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

P. O. BOX 621
HONOLULU, HAWAII 96809

May 12, 1993

Ref. LM-GA

RECEIVED
MAY 12 1993

OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

AQUACULTURE DEVELOPMENT
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AQUATIC RESOURCES
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RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

Mr. Brian J. J. Choy, Director
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
Central Pacific Plaza, 4th Floor
220 South King Street
Honolulu, O'ahu, Hawai'i 96813

Ref. to: HA-93:942

Dear Mr. Choy:

Subject: Final Environmental Assessment, Notice of Determination and Negative Declaration for Direct Sale of State-Owned, Government Road Remnant Parcels to F. Newell Bohnett, Et al. (dba) Pu'u Lani Ranch Corporation at Pu'u Anahulu Homesteads, Pu'u Anahulu, North Kona, Hawai'i; Tax Map Keys: 3rd Div./7-1-05: Road Remnant Parcels Abutting Parcels 7, 13, 14, 15, 16, 18, 42, and 44

The draft environmental assessment for the above-captioned direct sale of State-owned, government road remnant parcels to Mr. F. Newell Bohnett, et al. (dba) Pu'u Lani Ranch Corporation was submitted to your office on November 17, 1992. A Notice of Availability of Draft Environmental Assessment for this land disposition project was then published in the OEQC Bulletin on December 8, 1992. The deadline for comments from concerned individuals and organizations was January 7, 1993.

By the deadline date of January 7, 1993, letters concerning the land disposition project were received from the following persons and organizations that they represent:

1. Honorable Keola Childs, Councilmember, County Council of the County of Hawai'i;
2. Mr. Ron Reilly, Executive Director, People's Advocacy for Trails Hawai'i (P.A.T.H.);
3. Mr. Keith Wallis, Director, 'E Mau Na Ala Hele; and,

Mr. Brian J. J. Choy
(TMK: 3rd/7-1-05:Rd. Remn.)
Page 2.

4. Mr. Brian J. J. Choy, Director, Office of Environmental Quality Control.

Copies of those letters and written reponses thereto are attached to and made a part of the Final Environmental Assessment for the Disposition of State Road Remnants.

We are satisfied that the concerns or issues raised by these individuals and organizations that they represent have been sufficiently mitigated. As evidence that these concerns/issues have been mitigated, we are enclosing copies of the following pertinent documentation which are also attached to and made a part of the Final Environmental Assessment:

1. April 13, 1993 memorandum addressed to Mr. Glenn Taguchi, Hawai'i District Land Agent, Division of Land Management, from Mr. Don Hibbard, Administrator, State Historic Preservation Division. A sentence in this memorandum reads, in whole, as follows: "Thus, any proposed sale of the road will have no effect on historic sites. (Emphasis added.)"
2. April 20, 1993 letter addressed to Mr. Glenn Taguchi, Hawai'i District Land Agent, Division of Land Management, from Mr. Ken Margerum, Vice President of Pu'u Lani Ranch Corporation. A major portion of this letter reads, in whole, as follows: "This letter constitutes Pu'u Lani Ranch Corporation's commitment to provide trail access through its subdivision in Pu'u Anahulu. The ingress and egress locations will be finalized with the cooperation of Pu'u Lani Ranch and Na Ala Hele, along with P.A.T.H. These trails will be open during daylight hours and can be utilized by bicycles, equestrian activity, and hiking."

Based on the preceding mitigation procedures, we have determined that the proposed direct sale of the State-owned, government road remnant parcels to the applicant will not have a significant impact on the environment. Based on our determination and findings, we are filing a negative declaration for this land disposition project in conformance with the requirements of Chapter 343, Hawai'i Revised Statutes, as amended, relating to Environmental Impact State-ments.

Further, we are enclosing the following environmental assessment documents for your information and perusal.

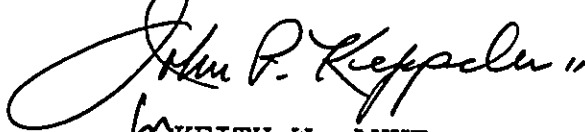
Mr. Brian J. J. Choy
(TMK: 3rd/7-1-05:Rd. Remn.)
Page 3.

1. OEQC Bulletin Publication Form; and,
2. Four (4) copies of the final environmental assessment.

In my position as the accepting authority, I wish to have the final environmental assessment notice for the direct sale of road remnants published in the OEQC Bulletin on May 23, 1993.

Your assistance in this matter is appreciated. Should your OEQC staff have any questions with regards to this matter, they may call Mr. Glenn Abe of our Land Management Division staff at 587-0414.

Very truly yours,


for KEITH W. AHUE

Enclosure

cc: Hawai'i District Land Office
Hawai'i Land Board Member
Ms. Donna Leong, Esq./Cades Schutte Fleming & Wright

1993-05-23-HI-FEA-Puuanahulu Homestead - Dixie Rd
of State owned gov't "Paper" Road Remnant Parcels MAY 23 1993

FINAL

ENVIRONMENTAL ASSESSMENT

FOR THE DISPOSITION OF STATE ROAD REMNANTS

PUUANAHULU, NORTH KONA, ISLAND OF HAWAII, STATE OF HAWAII

ADJOINING TAX MAP KEYS: 7-1-05:7, 13, 14, 15, 16, 18, 42 AND 44.

SUBMITTED BY:

PUU LANI RANCH CORP. and F. NEWELL BOHNETT

FEBRUARY 1993

I. SUMMARY

CHAPTER 343, HAWAII REVISED STATUTES ("HRS")
ENVIRONMENTAL ASSESSMENT

APPLICANT: Puu Lani Ranch Corp. and F. Newell Bohnett

ACTION: Acquisition of State road remnants (the "remnants")

PROJECT DESCRIPTION: The applicants propose to acquire certain State road remnants fronting the applicants' property. The applicants intend to consolidate their land ownerships with title to the remnants, and to resubdivide all of this property into lots one acre or more in size consistent with applicable County zoning. The applicants will construct a private access through the proposed subdivision, connecting to the existing Puu Lani Ranch subdivision roadways.

AREA: The proposed acquisition consists of approximately 4,375 lineal feet of paper roads. The roads are 25 feet wide.

PROJECT LOCATION: The remnants are located in Puuanahulu, North Kona, Southeast of Mamalahoa Highway.

PRESENT USE: The remnants are unimproved, have generally not been used as roads or utility corridors for many years and currently serve no practical purpose.

STATE LAND USE: Agriculture

ZONING: A-1A Agriculture

LANDOWNER: State of Hawaii

ACCEPTING AUTHORITY: Department/Board of Land and Natural Resources, State of Hawaii
P. O. Box 621
Honolulu, Hawaii 96809

CONSULTING AGENCIES: Department of Land and Natural Resources
P.O. Box 936
Hilo, Hawaii 96721-0936

II. PROJECT BACKGROUND

A. Project Location

The remnants are located in Puuanahulu, North Kona, designated and highlighted in red on the tax map attached hereto as Exhibit A. The remnants are unimproved, have not been used for many years and serve no practical purpose.

On the east, the remnants adjoin other land owned by the State (Tax Key 7-1-4-1) and used by F. Newell Bohnett under General Lease No. S-3589. Tax Key 7-1-4-1 has substantial frontage on Mamalahoa Highway and does not need the remnants for access. The applicants own the parcels that abut and adjoin the remnants on both sides.

While there are some residences in the general area, none of them gain access through the remnants, except that the resident of tax key 7-1-5:44 gains access by a dirt road that crosses one of the remnants. That road will be replaced by a much improved access as part of the consolidation and resubdivision intended by the applicants.

B. Project Description

The proposed acquisition consists of approximately 4,375 lineal feet of road. The remnants are 25 feet wide.

The applicants intend to consolidate ownership of their lands with the remnant title and to resubdivide all of this land into lots one acre or more in size as allowed by County zoning. The applicants intend to construct a private access to service the subdivision, as shown on the proposed plan attached hereto as Exhibit B.

If the proposed plan is implemented, the interior land area or lots will have access via the subdivision road system. Thus, acquisition of the remnants will not result in the loss of any legal or practical access and land uses but will actually facilitate improved access to the interior land.

C. Project Funding

The applicants will fund the acquisition of the remnants. The cost of acquiring the remnants will be determined by appraisal.

III. RELATIONSHIP OF THE PROPOSED ACTION TO STATE AND COUNTY LAND USE POLICIES

A. State Land Use Law

The area of the requested acquisition is located within the State Land Use Agriculture District. State Land Use Commission action is not required for the proposed remnant acquisition.

B. County Zoning

The subject site is zoned A-1A Agriculture. To effectuate the proposed subdivision, a subdivision application must be reviewed and approved by the County. The applicants intend to pursue such an application, contingent upon approval of the remnant acquisition request.

IV. DESCRIPTION OF AFFECTED ENVIRONMENT

A. Existing Land Use

The remnants are unimproved. The remnants and adjoining parcels have been used by Puuwaawaa Ranch for grazing when there is adequate forage. Portions of the remnants are lined by rock walls on one side of the remnant. These rock walls served as pasture enclosures. Portions of the remnants roughly coincide with an existing dirt road used by Puuwaawaa Ranch for pasture access.

B. Soil and Topographic Characteristics

The land including and surrounding the remnants is comprised primarily of rock from an a'a lava flow and a thin layer of top soil in some places. The subject area is, therefore, unfit and undesirable for crop cultivation.

C. Vegetation

Attached hereto as Exhibit C is a report from local resident Frank Hulce identifying the plant and animal species that exist on the remnants. Insofar as the existing ranch road coincides with the remnants, there is no appreciable plant or animal life. The other portions of the remnants are characterized by fountain grass and other non-native ranch and forage grasses. Scarce and unpredictable rainfall in this area, coupled with the poor soil quality, limits the range of plant species. As reported in Exhibit C, other plant species present on portions of the remnants include castor bean, century plant, silver oak, lantana, tenaru, panini cactus and pepper tree, plus a few norfolk pines planted in the vicinity of Tax Key 7-1-5-44. Similar vegetation covers large areas on the Island of Hawaii and is not unique to this area.

D. Wildlife

The remnants and surrounding land are marginal pasture areas used by Puuwaawaa Ranch. The area surrounding the remnants does not serve as a nesting ground for any endangered species of birds, waterfowl or other wildlife nor does it serve as a special habitat for any other animal. As reported by Frank Hulce, animal life prevalent in the immediate area, and throughout the larger area of Puuanahulu, Puuwaawaa and much of the rest of West Hawaii includes black francolin, grey francolin, khalig pheasant, Hawaiian owl, saffron finch and mongoose.

E. Archaeological

Acquisition of the remnants and development of the proposed subdivision will not endanger or threaten any historical or archaeological sites, features or remains. This is consistent with the lack of such sites, features or remains in the general vicinity of the remnants. There are some rock walls on or adjoining portions of the remnants. Those walls are characteristic of the many miles of pasture boundary walls prevalent throughout West Hawaii and have no particular historic significance.

F. Traffic

Mamalaha Highway fronts the applicants' properties. This highway has a right-of-way width of 50 feet, with a 24-foot wide pavement. Tax Key 7-1-4-1 has substantial frontage directly on Mamalaha Highway and does not need the remnants for access.

Principal access to the interior lots of the subdivision will be by way of a private 50 foot right-of-way width road. There is also an emergency access road to be located to meet the requirements of the County of Hawaii.

V. ALTERNATIVES TO THE PROPOSED ACTION

The existing remnants have not been used for a long time, are largely nonfunctional and serve no practical purpose. The private access proposed for the subdivision will be more serviceable to the existing land areas and the interior lots.

Development of the subdivision, private access and related improvements will be done in a manner consistent with appropriate County standards for subdivision and related improvements. Thus, there should not be any significant adverse impacts to the physical and natural environment.

The alternative of no action is undesirable because it would interfere with optimum use of both the remnants and the adjoining land. If the applicants were to perform their subdivision without incorporating the remnants, the remnants would be relatively isolated. In that condition the remnants would tend to be further overgrown and may pose fire hazards or otherwise increase the need for maintenance by the State.

VI. FINDINGS AND REASONS SUPPORTING DETERMINATION

The proposed action will not result in any significant environmental impact. The proposed action is merely to acquire certain State road remnants adjacent to the applicants' property. These remnants are unimproved, have not been used as roads or utility corridors for many years, and currently serve no practical purpose. The proposal will not have any significant historic/archeological, flora, or fauna impacts. There will be no significant impact on traffic since the remnants have not been used as roads for many years and principal access to the subdivision will be by way of a 50-foot right-of-way. ✓

VII. COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT AND RESPONSE LETTERS.

A Notice of Availability of the Draft Environmental Assessment for the proposed project was published in the OEQC Bulletin on December 8, 1992. The deadline for comments was January 7,

1993. Letters were received from the following persons or organizations:

Keola Childs, Councilmember, County of Hawaii
Ron Reilly, Executive Director, Peoples Advocacy
for Trails Hawaii
Keith Wallis, Director, E Mau Na Ala Hele
Brian Choy, Director, Office of Environmental Quality
Control, State of Hawaii

Copies of those letters and responses thereto are attached to this Final Environmental Assessment.

pj1/05600/0001/91docs/Env.Assess

KEOLA CHILDS
Commissioner



JAN 9 0 34 AM '93

COUNTY COUNCIL
COUNTY OF HAWAII
HAWAII COUNTY BUILDING
25 AUPUNI STREET
HONO, HAWAII 96720

January 7, 1993

Mason Young
Department of Land and Natural Resources
PO Box 821
Honolulu, HI 96809

RE: Direct sale of Government "Paper Road" Remnant Parcels
TMK: (3) 7-1-05:7,13,14,15,16,18, 42 & 44
North Kona

Dear Mr. Young:

The old highway corridors throughout our island present a unique opportunity for bicycle path recreation, particularly in West Hawaii, a region well suited for such. Sections where an essentially level, historic road bed already exists can save development costs normally associated with bikeways development, and can provide aesthetic and safety benefits unavailable along the shoulder of a high speed and usually narrow road.

In the subject case, I understand the Board has already committed itself to a sale. While regrettable for the reasons given above, a substitute routing between the north/south termini of these remnants is always a possibility, weighed against any loss of historic and aesthetic value provided by historic road sections. The options should be laid out for public consideration.

In the future, the potential of such corridors and remnants for bikeway use deserves to be explicitly addressed prior to any sale commitment being made, especially because these resources are so precious.

Sincerely

A handwritten signature in dark ink, appearing to read "Keola Childs".

Keola Childs

JAMES S. CAMPBELL
ROBERT B. BURN
WILLIAM M. SWOME
DOUGLAS E. PHOP
E. GUNNER SCHULL
MICHAEL P. PORTER
DONALD E. SCHARCE
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OF COUNSEL
J. RUSSELL CADES
WILLIAM L. FLEMING
HAROLD S. WRIGHT
A. SINGLETON CAULE
CALIFORNIA BAR ONLY
C. FREDERICK SCHUTTE
11921-10881
WRITERS DIRECT DIAL NUMBER

February 16, 1993

(808) 521-9328

Councilmember Keola Childs
County Council
County of Hawaii
Hawaii County Building
25 Aupuni Street
Hilo, Hawaii 96720

Re: Direct Sale of Paper Road Remnants;
Pu'u Lani Ranch Corp.

Dear Councilmember Childs:

Thank you for your letter dated January 7, 1993, regarding the Draft Environmental Assessment for the direct sale of road remnants by the State of Hawaii to Pu'u Lani Ranch Corp. This letter responds to your comments.

Pu'u Lani Ranch is committed to working with the State of Hawaii, the County of Hawaii, E Mau Na Ala Hele, and Peoples Advocacy for Trails Hawaii ("PATH") to create alternative bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. These trails would be a part of the State's, County's, and communities' efforts to create a system of bike paths and trails on the Island of Hawaii.

Since a bike/pedestrian plan has not been finalized, it is difficult at this time to establish accurately the location of the bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. However, this letter serves as Pu'u Lani Ranch's commitment to work with the State, County, E Mau Na Ala Hele, and PATH in establishing these trails. Pu'u Lani Ranch has also secured the commitment of neighboring Pu'u Wa'a Wa'a Ranch to participate in establishing these trails.

Councilmember Keola Childs
February 16, 1993
Page 2

The person to contact at Pu'u Lani Ranch concerning this subject is Mr. Ken Margerum, its Vice President, at 325-6660.

Thank you for the time that you spent reviewing and commenting on the Draft Environmental Assessment. If you have any questions or would like additional information, please call me.

Very truly yours,



Philip J. Leas

for

CADES (SCHUTTE FLEMING & WRIGHT

cc: Pu'u Lani Ranch Corp.

P.A.T.H.
Peoples Advocacy for Trails Hawaii
Ron Reilly
P.O. Box 458
Volcano Village, HI 96785
phone and fax 985-8516

RECEIVED
DIVISION OF
LAND MANAGEMENT
JAN 7 2 28 PM '93

Dec 31, 1992

Mr. Mason Young
Department of Land and Natural Resources
Division of Land Management
P.O.Box 621
Honolulu, Hawaii 96809

Dear Mr. Young,

The following comments register my organizations concerns regarding the proposed sale of state owned government road parcels located in North Kona TMK: 3rd 7-1-05:7, 13, 14, 15, 16, 18, 42 and 44 to Pu'u Lani Ranch Corporation.

I wish to draw your attention to major changes that have occurred at the federal level, and action that is pending at the state and county level that may significantly alter the way these and other such parcels of land may have been viewed in the past.

FEDERAL INITIATIVES

Enclosed is a brochure entitled "A Summary of BICYCLE AND PEDESTRIAN PROVISIONS under the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991", published by the U.S. Department of Transportation, Federal Highway Administration.

In it you will find source information and references which outline a "rethinking of attitudes and actions" on the part of the Federal Highways Administration regarding bicycle and pedestrian facilities, and the recognition of the beneficial societal value of increased utilization of these two modes of transportation.

There are eight major funding sources identified in this brochure:

1. National Highway System Funds
2. Surface Transportation Program Funds
3. Congestion Mitigation and Air Quality Improvement Program Funds
4. Federal Lands Highway Funds (Section 1032)
5. Scenic Byways Programs Funds (Section 1047)

P.A.T.H.
Peoples Advocacy for Trails Hawaii
Ron Reilly
P.O. Box 458
Volcano Village, HI 96785
phone and fax 985-8516

6. Section 1003 Funds for staff coordinators, and bridges.
7. Section 402 Funds for Safety Programs
8. Federal Transit Funding

These funding sources are available as 100% federal, 90:10, and 80:20 federal-local.

STATE OF HAWAII INITIATIVES

At present the State of Hawaii Department of Transportation has the draft of a statewide plan entitled "BIKE PLAN HAWAII" ready for public review and comment. Meetings on the Big Island are scheduled for February 1993.

In its final form this plan will significantly change highway design emphasis toward construction of highways that are safe for shared use between bicyclists and motor vehicles. A future plan to identify off road trails suitable for walking, hiking, equestrian and bicycling throughout the state is a recommendation of "BIKE PLAN HAWAII", and this recommendation has the full support of the Big Island bicycling community and P.A.T.H.

COUNTY INITIATIVES

The County of Hawaii has before it a request from P.A.T.H. for funding of a Hawaii County Bike/Pedestrian Corridor Plan, similar in scope to the Maui Bikeways Capital Improvement Plan. We regard this level of planning as an essential first step to be followed by prioritization, requests for funding and finally implementation of a network of recreational and utilitarian trails suitable for alternative modes of transportation.

It is our view that the parcels of land in question are prime candidates for review and consideration in light of the new and expanded guidelines of the Intermodal Surface Transportation Efficiency Act 1991. Given this shift in emphasis at the federal level, and the pending state and county initiatives we urge you to regard these parcels of state land as far more significant than "road remnants" or merely "paper roads" that "serve no practical purpose". Abandoned roadways on the Big Island are key links in an island wide network of trails designed for walking, hiking, jogging, equestrian and off road bicycling use.

P.A.T.H.
Peoples Advocacy for Trails Hawaii
Ron Reilly
P.O. Box 458
Volcano Village, HI 96785
phone and fax 985-8516

We respectfully ask that you postpone approval of the sale of these lands until the completion of the County Bike/Pedestrian Corridor Plan and/or the State of Hawaii Department of Transportation plan which together will address the on-road and off-road trail needs for the Big Island as part of a comprehensive trails development plan.

Sincerely,



Ron Reilly
Executive Director

enclosed: Pub No. FHWA-PD-92-028

cc: Mr. Tetsuo Harano Chief of Highways Division State D.O.T.
Mr. Kenneth Au Bicycle/Pedestrian Coordinator State D.O.T.
Mr. Hugh Ono State District Engineer, Hawaii State D.O.T.
Mr. Keola Childs Hawaii County Council
Mr. Jim Rath Hawaii County Council
Mr. Larry Tanimoto Consultant
Ms. Virginia Isbell State Representative
Mr. Mike O'Kieffe State Representative

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(1921-1988)
WRITER'S DIRECT DIAL NUMBER

February 16, 1993

(808) 521-9328

Mr. Ron Reilly
Executive Director
Peoples Advocacy for Trails Hawaii
P.O. Box 458
Volcano Village, HI 96785

Re: Direct Sale of Paper Road Remnants;
Pu'u Lani Ranch Corp.

Dear Mr. Reilly:

Thank you for your letter dated December 31, 1992, regarding the Draft Environmental Assessment for the direct sale of road remnants by the State of Hawaii to Pu'u Lani Ranch Corp. This letter responds to your comments.

Pu'u Lani Ranch is committed to working with the State of Hawaii, the County of Hawaii, E Mau Na Ala Hele, and Peoples Advocacy for Trails Hawaii ("PATH") to create alternative bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. These trails would be a part of the State's, County's, and communities' efforts to create a system of bike paths and trails on the Island of Hawaii.

Since a bike/pedestrian plan has not been finalized, it is difficult at this time to establish accurately the location of the bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. However, this letter serves as Pu'u Lani Ranch's commitment to work with the State, County, E Mau Na Ala Hele, and PATH in establishing these trails. Pu'u Lani Ranch has also secured the commitment of neighboring Pu'u Wa'a Wa'a Ranch to participate in establishing these trails.

The person to contact at Pu'u Lani Ranch concerning this subject is Mr. Ken Margerum, its Vice President, at 325-6660.

Mr. Ron Reilly
February 16, 1993
Page 2

Thank you for the time that you spent reviewing and commenting on the Draft Environmental Assessment. If you have any questions or would like additional information, please call me.

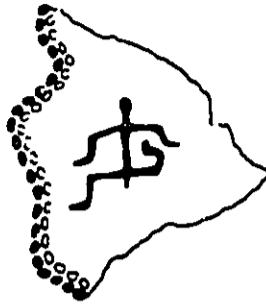
Very truly yours,



Philip J. Leas
for

CADES SCHUTTE FLEMING & WRIGHT

cc: Pu'u Lani Ranch Corp.



RECEIVED
DIVISION OF
LAND MANAGEMENT
NA ALA HELE
P.O. BOX 621
KAMUELA, HAWAII 96743

December 31, 1992

Mason Young
Department of Land and Natural Resources
Division of Land Management
P.O. Box 621
Honolulu, Hawaii 96809

Re: Pu'u Anahulu Homesteads Sale of Old Government Road

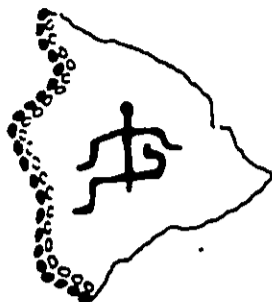
Dear Mr. Young,

Our organization would like ask for the postponement of the land sale of the road remnant to Puu Lani Ranch Corporation at this time. The reasons (and explanations to follow) for our opposition to the immediate sale are:

1. Permanent public access to the old Waimea-Hu'hu'e road is in the best interests of the residents of Hawaii, and this access should be assured with-in the sale agreement.
2. There are discrepancies with-in the Environmental Assessment as submitted by Puu Lani Ranch Corp. that should be corrected before a properly informed judgement can be made.
3. An archaeological survey should be done as is required by the Historic Preservation Division for the rest of the proposed subdivision.

Explanation of reasons:

1. Several community groups (E Mau Na Ala Hele, Peoples Advocacy for Trails Hawaii, North Hawaii Trails and Greenways Coalition, Kona Community Safety Lane, North Kohala Trails and Greenways) are strongly recommending the use of this and other old road beds as part of a system of bike paths and trails that will connect communities across the Big Island. The use of existing abandoned roadways is currently under consideration by the State of Hawaii Department of Transportation which is in the process of developing a state-wide bike plan. Where these old roadways are accessible from existing highways, they can be improved at much less expense than the widening of existing roads and bridges. These transportation corridors would be useable by equestrians, hikers, joggers, as well as bicyclists in a



NA ALA HELE

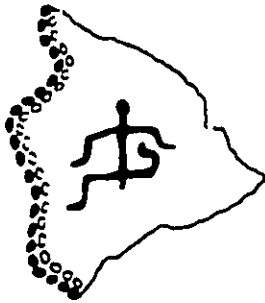
P.O. BOX 8384
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much safer manner than the existing bike lane on the highway combination. In the last several years there have been several deaths and serious injuries on our island by people who have been riding their bikes legally in there appropriate lanes. It would be wise for the State and County to utilize these existing transportation corridors (disguised as road remnants) especially where they run more or less parallel to existing roads and are economically less expensive to establish than adding bike routes or paying liability settlements and court costs after accidents on the highways.

The current State's Draft Bike Plan Hawai'i proposes spending as over \$51,000,000 in the County of Hawai'i on bike lanes, bike paths, and bike routes over the next 15 years. This coupled with the funds that are available from federal sources (including the "ISTEA" funds that are added at a 80% to 20% ratio) can provide significant funding to create these pathways.

When the proposed Waimea/Pu'u Wa'awa'a bike path is completed, the access to the south end of the old road at Puu Anahulu Homesteads could be provided partially by this "remnant" proposed for sale. With out this parcel, an alternate public access agreement would need to be negotiated with Puu Lani Ranch, or a new roadway would have to be built over about one quarter mile across rough lava terrain at much greater expense than sprucing up the existing right of way. Losing this section of the old road could also mean that trail users and vehicle drivers would be together on the Mamalahoa Highway for about an extra mile and a half. It is much smarter and safer to separate bikes and cars whenever possible.

2. There are discrepancies with-in the Environmental Assessment:
 - a) The Department of Land Management refers to sale parcel as "paper roads" (and the applicant uses the words "unimproved", "dirt road" and "old paper roads") which wrongly implies that there was never a roadway or publicly used right of way on the site.

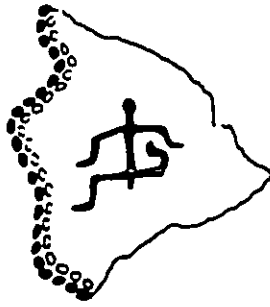


NA ALA HELE

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In fact, part and possibly the entire section proposed for sale was the main thoroughfare between Hu'ehu'e in Kona and Waimea in Kohala for nearly one hundred years. This roadway was constructed in the mid 1800's (possibly following the general route of an ancient Hawaiian trail) with great physical effort before the era of the bulldozer and dump truck. The main characteristic of this road is the hand placed, lava stone retaining walls with rubble and cinder fill. An example of this can be seen on the proposed sale property.

- b) The applicant states that the sale of the remnant "will not result in the loss of any legal or practical access" but will "facilitate improved access to the interior land." Our concern is that usable public access to the old road be maintained for future recreational and transportation needs. The sale of the State land should be done so as not to block access to the existing old road bed and to the many miles of the old road (an excellently preserved example of pre-automobile road construction that does not exist in such a length, in fact any where else in the Hawai'i.) The roadways being built at Puu Lani are private, and are referred to as such several times in the document.
 - c) The ahupua'as of Pu'u Anahulu and Pu'u Wa'awa'a have been recently reported to contain rare, indigenous bird and plant species as well as remnants of prehistoric extinct birds. Under these circumstances, it may be appropriate to have qualified biologists do the biological sections of the assessment prior to the land sale.
3. An archaeological survey is required for the entire proposed Puu Lani subdivision, and I suggest the DLNR should follow the example of the Division of Historic Preservation in requiring a survey of the sale property by a "qualified and approved" archaeologist. A determination of significance of sites should be completed prior to issuing the "right of entry". According to State policy, archaeological sites include construction (roads and trails, too) determined to be at



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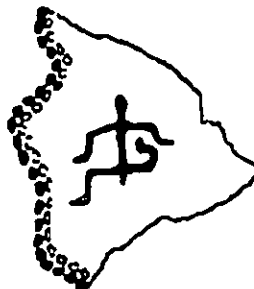
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least 50 years old. We suggest that the old Waimea-Hu'ehu'e road, because of it's length, method of construction, great number of excellent retaining walls, length of time used, and its general condition qualify it as a significant historical site. At least the northern section of the proposed sale property is part of the this old road, and a study should be done to determine if the entire remnant is also part of the same old road.

Our organization urges the DLNR Land Management Division to insure adequate permanent public access to the old Waimea-Hu'ehu'e road where it enters and proceeds onto Puu Lani property. Although the creation of the bike/pedestrian/equestrian trail may not happen within the next couple years, we feel the access is important to the future recreation and transportation needs of the residents of the Big Island. If the state feels the sale is appropriate, please consider asking the applicant to provide alternate improved (suitable for horses, bikes and hikers) access that will connect the highway with the end of the old roadway. Since the subdivision permits have not been issued, it should be possible to work this access in with a practical lay-out for the proposed subdivision on Puu Lani property.

Sincerely,

Keith Wallis
Board of Directors, E Mau Na Ala Hele



NA ALA HELE

P.O. BOX 4384
KAMUELA, HAWAII 96743

January 07, 1993

Mason Young
Department of Land and Natural Resources
Division of Land Management
P.O. Box 621
Honolulu, Hawaii 96809

Re: Pu'u Anahulu Homesteads Sale of Old Government Road

Dear Mr. Young,

I would like to update my last letter with comments regarding the sale of road remnants at Puu Anahulu.

I have talked to both Mr. Bohnett and Ken Hargerum, Vice President of Puu Lani Ranch. I appreciate their willingness to talk about my concerns. I was glad to hear that they also have an interest in equestrian and bike trails, and included a great number (private) pathways within the Puu Lani subdivision. They even propose to create a grade separated, under the highway pathway for bikes and horses to connect with (private) trails surrounding the proposed private golf course at Puu Anahulu. They also intend to provide an access from their property to State owned, Bohnett leased land for resident equestrians. With this focus on equestrian and bike activity for Puu Lani residents, the proposed "old road trail" will become an adjacent amenity to subdivision residents.

Given this interest on the part of Puu Lani Ranch, and their willingness to discuss possible solutions to the access problem to the "old road" resource, I suggest that State, Puu Lani Ranch, and interested public groups such as PATH and E Mau Na Ala Hele work together to solve the access problem. This solution might be one of the following (my suggestions):

- 1) Create a usable access outside of Puu Lani property.
- 2) Use of proposed Puu Lani trails and roads to access the highway until such time as an acceptable alternate is created.
- 3) Simply the use of a designated right of way (improved trail or road) with in Puu Lani as permanent access to the old road. Check in with the security guard upon entering the property?

JAN- 7-93 THU 7:56

P. 03



Realistically, the "old road trail" will not become a reality for several years, and in the mean time public access to the old road will be minimal. However it is of great importance that agreements be made now concerning access to this significant recreational and transportation resource.

Thank you,

A handwritten signature in cursive script that reads "Keith Wallis".

Keith Wallis
Board of Directors, E Mau Na Ala Hele

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C. FREDERICK SCHUTTE
(1921-1988)

WRITER'S DIRECT DIAL NUMBER

February 16, 1993

(808) 521-9328

Mr. Keith Wallis
Board of Directors
E Mau Na Ala Hele
P.O. Box 6384
Kamuela, Hawaii 96743

Re: Direct Sale of Paper Road Remnants;
Pu'u Lani Ranch Corp.

Dear Mr. Wallis:

This letter responds to the comments in your letters dated December 31, 1992, and January 7, 1993, regarding the Draft Environmental Assessment for the direct sale of road remnants by the State of Hawaii to Pu'u Lani Ranch Corp.

As you discussed with Mr. Ken Margerum and Mr. Newell Bohnett of Pu'u Lani Ranch, the Ranch is committed to working with the State of Hawaii, the County of Hawaii, E Mau Na Ala Hele, and Peoples Advocacy for Trails Hawaii ("PATH") to create alternative bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. These trails would be a part of the State's, County's, and communities' efforts to create a system of bike paths and trails on the Island of Hawaii.

The person to contact at Pu'u Lani Ranch concerning this subject is Ken Margerum, its Vice President, at 325-6660.

Since a bike/pedestrian plan has not been finalized, it is difficult at this time to establish accurately the location of the bikeway/pedestrian trails in the vicinity of Pu'u Lani Ranch. However, this letter serves as Pu'u Lani Ranch's commitment to work with the State, County, E Mau Na Ala Hele, and PATH in establishing these trails. Pu'u Lani Ranch has also secured the commitment of neighboring Pu'u Wa'a Wa'a Ranch to participate in establishing these trails.

Mr. Keith Wallis
February 16, 1993
Page 2

Because of the configuration and physical condition of the remnants, they do not present the most likely alternative for siting a bikeway or pedestrian trail. In particular, the intersection points with Mamalahoa Highway are considered dangerous and inappropriate by the Department of Transportation. Where the western terminus of the remnant exits Puuanahulu Homesteads and intersects the highway, the remnant grade is as steep as 38%, and the highway is simultaneously descending and curving. The eastern terminus of the remnant is a substantial distance from the highway and would strand the remnant user in rough terrain characterized by lava fields, heavy brush and other difficult conditions.

Your December 31 letter also inquires about an archaeological survey. Attached is a report from Chiniago Inc. dated December 8, 1992, which summarizes the results of its archaeological investigation of the road remnants. That report refers to Chiniago's archaeological survey of Puu Lani Phase II and concludes, "It was the conclusion of that archaeological survey report that sufficient information has been recorded about the site [the road remnant], and that it is no longer significant."

Finally, your December 31 letter refers to recent reports of rare, indigenous bird and plant species and remnants of prehistoric birds. Careful scrutiny of the remnants by community residents, the archaeologist, and ranch personnel does not substantiate the existence of rare bird or plant species nor suggest that a change in the use of the remnants would appreciably affect habitat conditions of plant and animal species on and in the vicinity of the remnants. The Botanical Assessment of the neighboring Royal Vista Estates Golf Course site by Char & Associates (February 15, 1990) and the Survey of the Avifauna and Feral Mammals at Puuanahulu, North Kona by Phillip L. Bruner (February 7, 1990) corroborate these observations. Char encountered no officially listed threatened and endangered species on that site and notes that none of the native species inventoried on that site are considered rare. Bruner concludes with respect to endemic birds, including the Hawaiian Hawk or 'Io, "This property does not offer anything unusual or unique for these birds. Abundant habitat of the type found on this site occurs in the North Kona and South Kohala region."

In view of the foregoing observations and corroborative reports, we believe that the additional biological assessment suggested in your letter is unnecessary.

Mr. Keith Wallis
February 16, 1993
Page 3

Thank you for the time that you spent reviewing and commenting on the Draft Environmental Assessment. If you have any questions or would like additional information, please call me.

Very truly yours,



Philip J. Leas

for

CADES SCHUTTE FLEMING & WRIGHT

Enclosure

JOHN WAIHEE
GOVERNOR



FILE COPY

BRIAN J. J. CHOY
Director

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL
320 SOUTH KING STREET
FOURTH FLOOR
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4186

November 19, 1992

Mr. Glenn Y. Taguchi
Hawai'i District Land Agent
Department of Land and Natural Resources
P. O. Box 936
Hilo, Hawaii 96721-0936

Dear Mr. Taguchi,

SUBJECT: DIRECT SALE OF STATE-OWNED GOVERNMENT "PAPER" ROAD REMNANT PARCELS

When submitting the Final Environmental Assessment (EA) for the above project please include a listing of "findings and reasons supporting the determination", pursuant to Title 11, Chapter 200 §11-200-10 of the Hawaii Administrative Rules.

If you have any questions, please contact Karen Mau at 586-4185. Thank you for your cooperation.

Sincerely,

Brian J. J. Choy

Brian J. J. Choy
Director

BC:km

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C. FREDERICK SCHUTTE
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WRITER'S DIRECT DIAL NUMBER

February 16, 1993

(808) 521-9328

Mr. Brian J. J. Choy
Director
Office of Environmental Quality Control
State of Hawaii
220 South King Street
Fourth Floor
Honolulu, Hawaii 96813

Re: Direct Sale of Paper Road Remnants;
Pu'u Lani Ranch Corp.

Dear Mr. Choy:

Thank you for your letter dated November 19, 1992, regarding the Draft Environmental Assessment for the direct sale of road remnants by the State of Hawaii to Pu'u Lani Ranch Corp. This letter responds to your comment.

Your letter states that the Final Environmental Assessment should include a listing of "findings and reasons supporting the determination". The Final Environmental Assessment will include a section VI with those findings and reasons.

Thank you for the time that you spent reviewing and commenting on the Draft Environmental Assessment. If you have any questions or would like additional information, please call me.

Very truly yours,

Philip J. Leas
Philip J. Leas
for

CADES SCHUTTE FLEMING & WRIGHT

CHINIAGO INC.

Archaeological Consulting
P. O. Box 2649
Kamuela, Hawaii 96743
(808) 885-7262
FAX: 885-5655

December 8, 1992

Mr. Ken Margerum, Vice President
Puu Lani Ranch, Inc.
P. O. Box 2590
Kamuela, Hawaii 96743

Dear Mr. Margerum:

Subject: Archaeological Investigation of Puu Anahulu Homestead Road Remnant

We have completed an investigation of the Puu Anahulu Road remnant situated between the paved North Kona Belt Road and the paved Puu Lani Phase I access road. This inspection consisted of personal observations at several locations along the approximately one half of one mile length of the feature.

The United States Department of Agriculture Soil Conservation Service indicates two soil types in the area traversed by the road remnant:

"Rock Land

"—Rock land (rRO) is a miscellaneous land type that consists of pahoehoe lava bedrock covered in places by a thin layer of soil material. The dominant slope is between 10 and 15 percent. Pahoehoe outcrops occupy 50 to 90 percent of the surface. The average depth of the soil material is between 6 and 8 inches, although in some places the material extends into the cracks of the lava. Rock land is at an elevation ranging from near sea level to 13,000 feet and receives from 10 inches to more than 150 inches of rainfall annually. The vegetation is confined mainly to the soil-covered areas and the cracks in the lava. It varies according to rainfall and temperature, and suffers from drought during dry spells. The hazard of water erosion is slight. Rock land is used for pasture, wildlife habitat, and watershed. (Capability subclass VIIc, nonirrigated)

"Rough Broken Land

"Rough broken land (RB) is a miscellaneous land type that consists of very steep, precipitous land broken by many intermittent drainage channels. It occurs primarily in gulches, and the slope is dominantly 35 to 70 percent. The soil material ranges from very shallow to deep. Stones and rock outcrops are common in some areas. Elevation ranges from near sea level to 3,000 feet, and the annual rainfall ranges from 50 inches to more than 150 inches. Vegetation varies with rainfall. Kukui trees are common in the gulches. There are a few, scattered waterfalls.

"Rough broken land is used for pasture, woodland, wildlife habitat, and recreation areas. Adapted pasture plants and yields are similar to those for soils associated with this land type. (Capability subclass VIIc, nonirrigated)" [USDA 1973: 51]

Vegetation associated with the remnant includes scattered castor bean, century plant, silver oak, lantana, tenaru, panini and pepper tree. By far the dominant vegetation is a thick stand of cane grass.

During our recent archaeological survey of Puu Lani Phase II, we recorded this as Hawaii Register of Historic Places Site 18492, and described it as follows:

"This site comprises the historic Homestead Road which crosses the project area from west to east for a distance of approximately 1200 meters. It is marked by parallel stone walls measuring 1.0 meter in width and standing as high as 1.5 meters, and averages about 8.0 meters in width. The roadbed is not paved, but traverses the natural ground surface. It is quite overgrown with vegetation, and has been bulldozed in places. It clearly has not been used for a long time."

It was the conclusion of that archaeological survey report that sufficient information has been recorded about the site, and that it is no longer significant.

Sincerely yours,



William Barrera, Jr.
President

JOHN WAIHEE
GOVERNOR OF HAWAII

RECEIVED
DIVISION OF
LAND MANAGEMENT

APR 14 2 30 PM '93



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 8TH FLOOR
HONOLULU, HAWAII 96813

April 13, 1993

KEITH AJIUE, CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCE

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DONA L. HANAIKE

AQUACULTURE DEVELOPMENT
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FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
DIVISION


LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

LOG NO: 8007

DOC NO: 9304ks04

MEMORANDUM

TO: Glenn Taguchi, Hawaii District Land Agent
Land Management

FROM: Don Hibbard, Administrator
State Historic Preservation Division 

SUBJECT: **State Land Disposition--Sale of Road Remnant, Puu Lani Ranch
Puuanahulu, North Kona, Island of Hawaii
TMK: 7-1-05: Roadway**

HISTORIC PRESERVATION PROGRAM CONCERNS:

Our office has reviewed an archaeological report (entitled "Puu Anahulu, North Kona, Hawaii Island: Archaeological Inventory Survey of TMK 7-1-0: multiple" by Barrera [1992]) from Chiniago Inc. documenting the findings of an inventory survey conducted for Puu Lani Ranch Phase II in parcels 13, 14, 15, 16, 18, and 42 in plat map TMK 3-7-1-05. The report includes the identification and recording of the subject homestead road as an historic site, numbered -18492. Pages 4, 8, 13, and 14 of the report showing relevant information regarding the road, are enclosed.

We agree with the survey results that Site -18492 is significant for its information content and sufficient documentation of the site has been undertaken during the inventory survey. Thus, any proposed sale of the road will have "no effect" on historic sites.

Our office does have several concerns on other aspects of the report and the development project, particularly the presence of graves within the project area. Our office will be requesting additional data from the consulting archaeological firm before we can accept

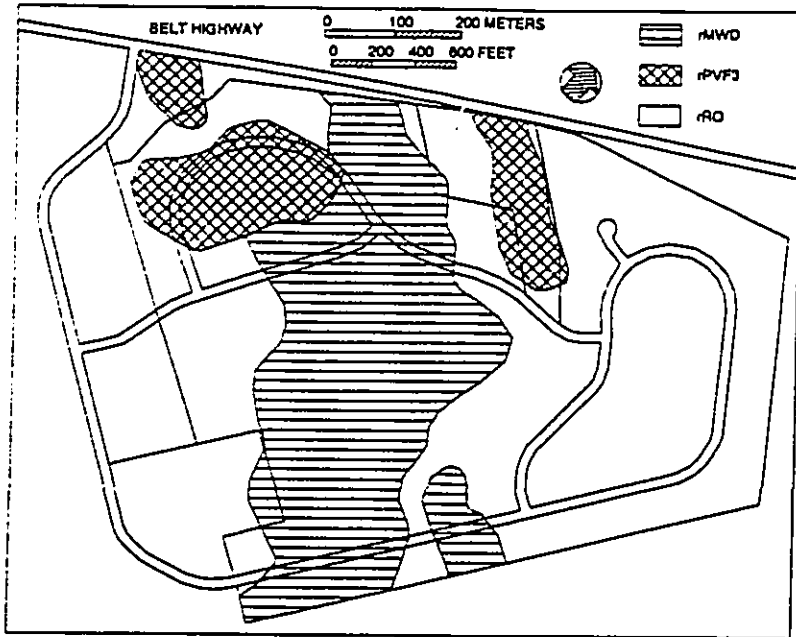
Glenn Taguchi
Page 2

the report as a final product; however, we do not anticipate this element of our concerns to affect the status of any proposed sale of the homestead roadway within the Phase II Puu Lani Ranch development.

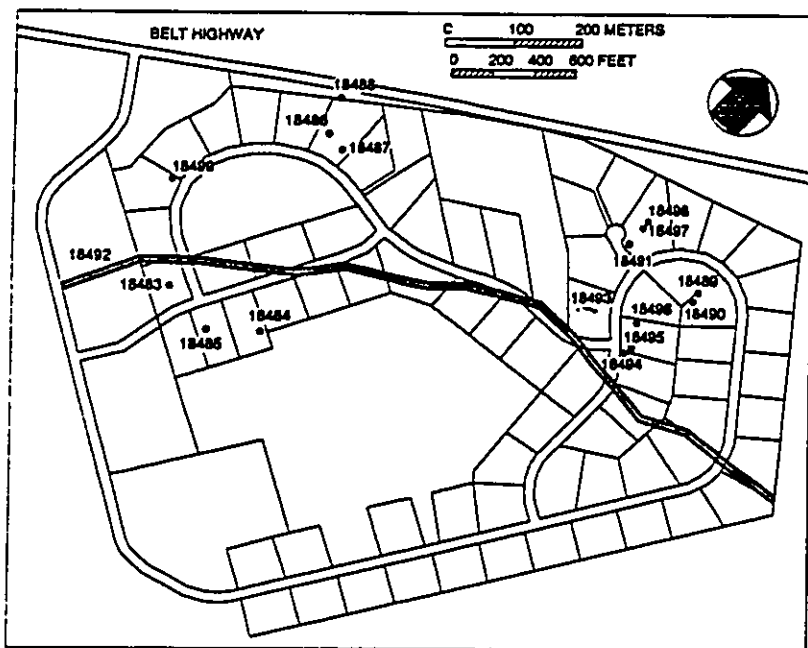
We would like to point out that our office has had letters from a couple of community groups in the area expressing great interest in the sale of the road and who apparently would rather have access to the road left in State hands. If you should have any further questions, please contact Kanalei Shun at 587-0007 or Marc Smith at Hilo at 933-4346.

KS:amk

Enclosure



5. USDA Soil Types in Project Area



6. Site Location Map

has been done between here and the coast to permit positing a prehistoric sequence, and it was expected that gravesites and various walls associated with ranching would be located.

The property was searched by one person who walked sweeps at intervals of between 15 and 25 meters, depending upon the terrain and vegetation. Sites were marked in one phase, and returned to and recorded in a second phase. Mapping was accomplished by tape and compass, using lot corners staked by professional surveyors as reference points. The client was able to provide information furnished by a representative of the State Historic Preservation Division regarding the location of two grave sites pointed out by a local resident. Because there is such a source of local information regarding burial sites, the normal procedure of test excavating suspected graves was not followed. It was felt that the proper procedure would be to consult with local residents following completion of the survey regarding the locations of any other known gravesites.

II. RESULTS

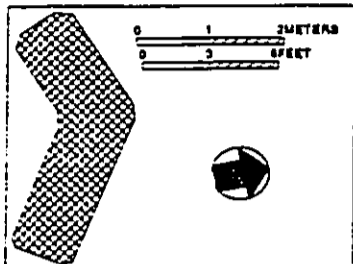
SITE 18483

This is a stone terrace measuring 3.1 by 7.0 meters [21.7 square meters] and standing to a height of 1.10 meter on the north side. It is level with the ground surface on the south. A fragment of metal rain gutter and two pieces of unidentifiable metal were located on the surface.

The site is probably the foundation of a historic period structure associated with ranching activities.

SITE 18484

This is an irregular retaining wall measuring 0.9 by 3.6 meters [3.4 square meters] and standing to a height of 0.3 meter on the south side and 1.0 meter on the north. It is constructed of basalt cobbles and boulders stacked on and against a bed-



14. Plan of Site 18484

rock outcrop at the top of a low bluff. No midden or artifacts were present.

The site probably dates from the historic period, and was probably associated with ranching activities.

SITE 18485

This is a rock mound measuring 1.2 by 1.8 meters [2.1 square meters] and standing to a height of between 0.5 and 0.8 meter. It is constructed of basalt cobbles and boulders on a low blufftop. No midden or artifacts are present.

The site appears too crude and too small to be a grave. It may have seen use during the historic ranching period.

SITE 18486

This is an irregular mound measuring 1.8 by 3.1 meters [5.5 square meters] and standing to a maximum height of 0.8 meter, but mostly to a height of 0.5 meter. It is constructed of stacked cobbles and boulders, and is situated in a flat grassy area.

The site is a possible grave.

SITE 18487

This is an irregular mound measuring 2.1 by 3.4 meters [7.1 square meters] and standing to a height of 0.8 meter. It is constructed of basalt pebbles and cobbles, and is situated in a flat grassy area.

The site is a possible grave.

SITE 18488

This is an irregular mound measuring 1.5 by 2.1 meters [3.1 square meters] and standing to a height of 0.8 meter. It is constructed of basalt cobbles and boulders, and is situated in a flat grassy area.

The site is a possible grave.

SITE 18489

This is an irregular mound measuring 1.8 by 2.7 meters [4.8 square meters] and standing to a height of 0.8 meter. It is constructed of basalt cobbles and boulders and is situated in the bottom of a low grassy swale. The north end abuts a bedrock outcrop.

The site is a possible grave.

SITE 18490

This is an irregular mound measuring 1.2 by 3.4 meters [approximately 4.0 square meters] and standing to a height of 0.8 meter. It is constructed of stacked basalt cobbles and boulders, and abuts a bedrock outcrop on the west side. It is situated in a low grassy swale.

The site probably dates from the historic period, and was probably associated with ranching activities.

SITE 18491

This is an enclosure built on and against a bedrock outcrop. It measures 7.3 by 13.5 meters [81.6 square meters] and stands to a height of between 0.3 and 0.6 meter. The wall is between 0.5 and 0.9 meter wide, covers an area of 16.7 square meters and encloses an area of 64.9 square meters.

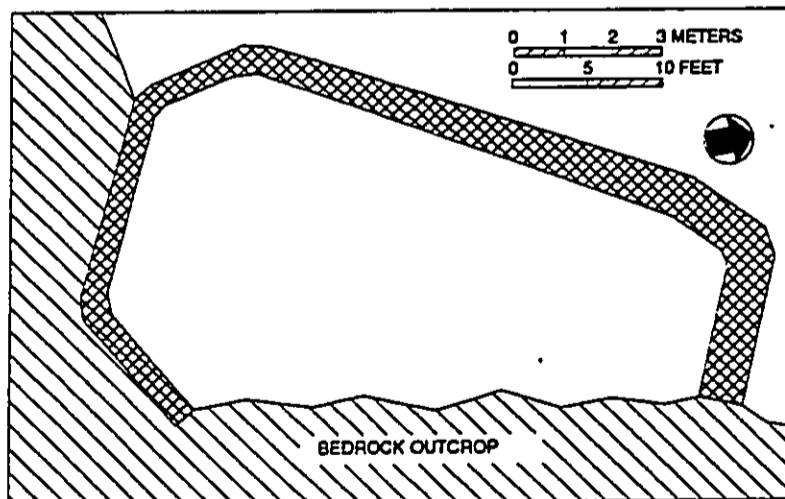
The site is probably an animal pen dating from the historic period.

SITE 18492

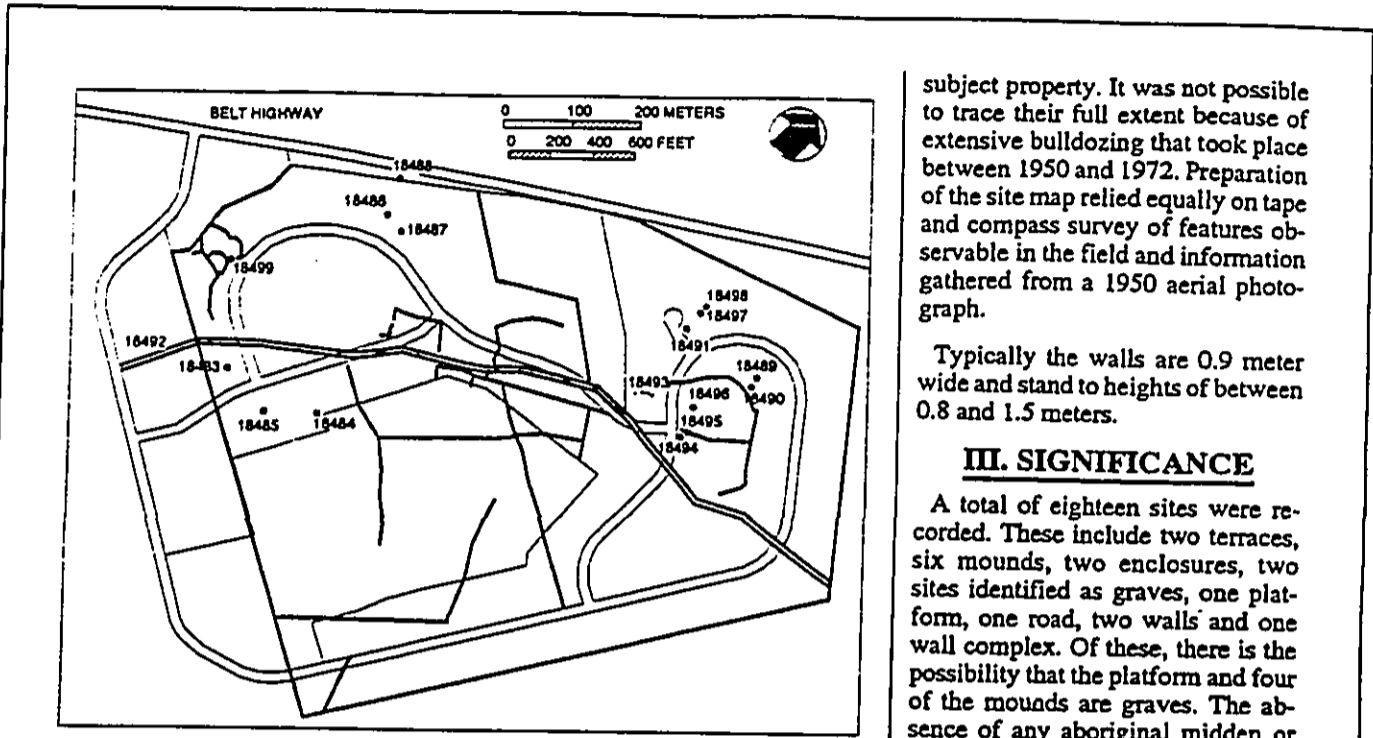
This site comprises the historic Homestead Road which crosses the project area from west to east for a distance of approximately 1200 meters. It is marked by parallel stone walls measuring 1.0 meter in width and standing as high as 1.5 meters, and averages about 8.0 meters in width. The roadbed is not paved, but traverses the natural ground surface. It is quite overgrown with vegetation, and has been bulldozed in places. It clearly has not been used for a long time.

SITE 18493

This site consists of two sections of a collapsed and deteriorated wall built along the edge of a steep bluff,



13. Plan of Site 18491



22. Location of Site 18500

subject property. It was not possible to trace their full extent because of extensive bulldozing that took place between 1950 and 1972. Preparation of the site map relied equally on tape and compass survey of features observable in the field and information gathered from a 1950 aerial photograph.

Typically the walls are 0.9 meter wide and stand to heights of between 0.8 and 1.5 meters.

III. SIGNIFICANCE

A total of eighteen sites were recorded. These include two terraces, six mounds, two enclosures, two sites identified as graves, one platform, one road, two walls and one wall complex. Of these, there is the possibility that the platform and four of the mounds are graves. The absence of any aboriginal midden or artifactual remains indicates that utilization of all of these sites was

SIGNIFICANCE CRITERIA											
SITE	TYPE	Dimensions [meters]			A	B	C	D	E	NLS	NS
		Length	Width	Height							
18483	Terrace	7.0	3.1	1.1							
18484	Retaining Wall	3.6	0.9	1.0							X
18485	Mound	1.8	1.2	0.8							X
18486	Mound	3.1	1.8	0.8				X	?		
18487	Mound	3.4	2.1	0.8				X	?		
18488	Mound	2.1	1.5	0.8				X	?		
18489	Mound	2.7	1.8	0.8				X	?		
18490	Mound	3.4	1.2	0.8							X
18491	Enclosure	13.5	7.3	0.6							X
18492	Homestead Road	1200	8.0								X
18493	Wall	35.0	0.6	0.8							X
18494	Grave	2.7	1.2					X	X		
18495	Grave	12.9	10.0	0.8				X	X		
18496	Terrace	6.3	2.0	0.8							X
18497	Platform	2.8	1.6	1.0				X	?		
18498	Enclosure	19.1	10.3	0.5							X
18499	Terrace	11.0	4.0	1.0							X
18500	Historic Wall Complex										X

SIGNIFICANCE CRITERIA

- A - Association with Broad Patterns of History
- B - Association with Significant Persons
- C - Excellent Example of a Site Type
- D - Contains Important Information on Prehistory or History
- E - Culturally Significant to an Ethnic Group
- F - Provisionally Significant, Further Work Needed to Confirm Significance
- NLS - No Longer Significant, Sufficient Information Has Been Recovered
- NS - Not Significant

Table 2. Sites and Significance Assessments

during the historic period. This supposition is strengthened by the demonstrated presence of a homestead settlement here for about the last one hundred years.

The already accomplished recording of Sites 18483 through 18485, 18490 through 18493, 18496, and 18498 through 18500 represents sufficient data recovery, and these sites are no longer significant.

The two sites that have been indicated as graves [HRHP 18494 and 18495] are significant for their infor-

mation content and for their importance to an ethnic group.

The remainder of the sites [HRHP 18486 through 18489 and 18497] are possible graves, and are therefore of significance for their information content and possibly for their importance to an ethnic group.

References

USDA, Soil Conservation Service

1973 *Soil Survey of Island of Hawaii, State of Hawaii.* [in cooperation with University of

Hawaii Agricultural Experiment Station] U. S. Government Printing Office. Washington, D. C.

Walker, Alan T., L. Kalima and P. H. Rosendahl

1990 *Archaeological Inventory Survey, Royal Vistas Estates Development, Land of Puuanahulu, North Kona District, Island of Hawaii [TMK: 3-7-1-05: 26-34, 39-41].* Paul H. Rosendahl, Ph.D., Inc. Hilo, Hawaii.

Fax Transmittal Memo 7672

To: G. Ake
Company: DLNR - Land Mgt
Location: HNL
Fax #: 581-0455
Telephone #: 581-0444

No of Pages: 1 Today's Date: 4-20-93 Time: 2:31
From: G. Taguchi
Company: DLNR - Land Mgt
Location: Hilo
Fax #: 933-4244
Telephone #: 933-4243
Original Disposition: Destroy Return Call for pickup

Comments: Ltr from Ken Margerum - trail access thru subdivision in Puu Anahulu. (include in final E.A.)

04-20-1993 12:26PM FROM PULUPULUA RANCH, INC. TO 9334249 P.01



RECEIVED
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND MANAGEMENT
HILLO, HAWAII
APR 20 1 37 PM '93

April 20, 1993

Mr. Glenn Taguchi
Dept. of Land and Natural Resources
P.O. Box 4849
Hilo, Hawaii 96720-0849

Dear Mr. Taguchi:

This letter constitutes Puu Lanii Ranch Corporation's commitment to provide trail access thru it's subdivision in Puu Anahulu. The ingress and egress locations will be finalized with the cooperation of Puu Lanii Ranch and Ne Ala Hale, along with P.A.T.H.

These trails will be open during daylight hours and can be utilized by bicycles, equestrian activity and hiking.

We look forward to working with the State and improving the recreational opportunities in West Hawaii. Thank you for your time.

Yours truly,

PUU LANII RANCH CORPORATION

Ken Margerum
Ken Margerum
Its Vice President

RK/lj