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KE KIA'ĀINA O KA MOKU'ĀINA 'O HAWAI'I

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In reply, please refer to:
File:

April 18, 2023

62-53 & 62-54 S106 ltr (initial) SHPD.docx

Alan S. Downer, PhD, Administrator
State of Hawai'i, Department of Land and Natural Resources
State Historic Preservation Division
601 Kamokila Boulevard, Rm. 555
Kapolei, HI 96707
Submitted via: SHPD HICRIS

Dear Dr. Downer:

Subject: National Historic Preservation Act (NHPA)
Request to Initiate Section 106 Consultation
Hilo WWTP Rehabilitation and Replacement Project – Phase I and Phase II
Clean Water State Revolving Fund Project No. C150062-53 and C150062-54
Waiākea Ahupua'a, South Hilo District, Hawai'i Island
TMK: (3) 2-10-013:002 por.
State Historic Preservation Division (SHPD) Project No. 2023PR00356

On behalf of the Environmental Protection Agency (EPA), the State of Hawai'i Department of Health (DOH) requests to initiate Section 106 consultation with the State Historic Preservation Officer (SHPO) for the proposed Hilo WWTP Rehabilitation and Replacement Project – Phase I and Phase II projects located in Waiākea Ahupua'a, South Hilo District, Hawai'i Island.

The proposed projects may be eligible to utilize federal funding that is administered by the DOH through the Clean Water State Revolving Fund (CWSRF) and will be considered a federal action and undertaking, as defined by Section 106 of the NHPA of 1966 (as amended 2014), Title 54 of the United States Code (54 USC) Section 306108, and Title 36 of the Code of Federal Regulations (36 CFR) Part 800.

The EPA has authorized the DOH to act on behalf of the EPA regarding NHPA Section 106 notification and consultation. This letter is to request to initiate the Section 106 consultation process with the SHPO and State Historic Preservation Division (SHPD) in accordance with 36 CFR, Section 800.3.

The DOH may provide funding under the CWSRF to the County of Hawai'i, Department of Environmental Management (DEM) for the Hilo WWTP Rehabilitation and Replacement Project – Phase I and Phase II projects.

Project Description

The existing Hilo WWTP is located within a relatively undeveloped area of South Hilo on Kekuanaoa Place approximately 4,115 feet (about 0.78 mile) southeast of Runway 26 on Hilo

International Airport, within TMK: (3) 1-2-013:002, a 2,407.756-acre parcel owned by the State of Hawai'i (*See Attachment A*). The plant was constructed by the County in the early 1990s and, since then, has been operated by the County of Hawai'i Department of Environmental Management (COH-DEM). During the construction of the Hilo WWTP, an area of 14.899 acres assigned to the County was cleared of vegetation and graded for construction. The developed facilities of the WWTP occupy an area of about 8.4 acres within the 14.899-acre area. The adjacent areas immediately surrounding existing plant facilities lie to the south, east, and north of the 8.4-acre developed area. These cleared areas have largely remained undeveloped and have served as laydown and staging areas for WWTP maintenance and operations. The nearest residential area lies across the runway and over one (1) mile to the north of the WWTP. The relatively flat terrain, intervening vegetation, and the distance provide a visual buffer between the residential area and the WWTP.

In response to these condition assessments, the COH-DEM is proposing to undertake replacement and related improvements to critical facilities and then subsequently construct other new facilities to improve the treatment processes at the WWTP. These replacement facilities and subsequent improvements will be implemented in phases. The replacement facilities are sited nearby or adjacent to the ones being replaced within the existing developed area of the WWTP and within areas previously cleared adjacent areas to the south and east of the plant. Both the proposed replacement and new facilities are needed to ensure continued current operations and to meet future needs at the WWTP. In addition, facilities will be developed to meet current code requirements and to ensure the long-term operation of the plant functions.

Phase 1 of the subject project consists of the replacement of critical core functions and facilities within the 8.4-acre developed area at the WWTP or within the adjacent previously cleared areas, including the following:

- Replacement of the headworks, including associated improvements (septage receiving facility, headworks electrical building, and the odor control system);
- Replacement of two anaerobic digesters, including associated improvements (sludge blending tanks with odor control facilities, digester control building, digester gas conditioning system, and waste gas flare; and
- Demolition of the existing headworks and digester facilities upon completion of the replacement facilities.

See *Attachment B* for site plans.

As previously stated, the replacement facilities and associated improvements are sited nearby or adjacent to the facilities being replaced in areas that were cleared of vegetation during the construction of WWTP.

Subsequent Phases (identified as “Phase 2” and “Future”) of the proposed project consist of:

- Facilities to upgrade and improve treatment processes with resultant improvement to the quality of the effluent,
- Facilities for odor control, and
- Facilities to improve overall operations of the WWTP. These improvements encompass a variety of improved or new plant components affecting secondary treatment, solids

handling, warehousing, storage and maintenance functions, and operational control facilities.

Similarly, these project-related ground disturbances would include excavation and grading within the developed area of the plant site for the installation of new equipment, structures, buildings, and associated utilities.

Area of Potential Effect (APE)

The APE for the Hilo WWTP Rehabilitation and Replacement Projects comprises an approximately 14.9-acre (6.03-hectare) portion of 2,407.756-acre (974.384-hectare) parcel TMK: (3) 1-2-013:002, which is owned by the State of Hawai'i. The APE is depicted on a portion of the 1995 Hilo U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle on Hawai'i Island, tax map plat, and an aerial photograph (*See Attachment A*). All project staging will be confined within the APE limits shown in *Attachment A.*

Archaeological Background

Numerous past archaeological studies have been conducted in the vicinity of the Hilo WWTP Rehabilitation and Replacement Projects APE; however, only one of these prior studies overlaps the APE (Rosendahl 1988; *Attachment C*). In 1988 Paul H. Rosendahl, Inc. (PHRI) conducted an archaeological reconnaissance survey for an environmental impact statement (EIS) for a proposed Hilo Wastewater Treatment Plant project (Rosendahl 1988). No archaeological features were identified during the archaeological reconnaissance and no additional archaeological work was recommended.

Recently Cultural Surveys Hawai'i, Inc. (CSH) completed a literature review and field inspection (LRFI) for the current undertaking (Wilkinson et al. 2023) for inclusion in the project's Draft EA *(See Attachment D)*. The LRFI was designed to determine the likelihood that historic properties may be affected by the project and, based on findings, consider cultural resource management recommendations to facilitate project planning and support the project's historic preservation and environmental review compliance.

The Wilkinson et al. (2023) literature review component identified no previously identified historic properties within the APE, and no archaeological historic properties were identified during the field inspection component. Evidence of prior ground disturbance was observed throughout the entire 14.899-acre APE. Based on these findings of the LRFI, an archaeological inventory survey was not recommended.

Consultations

Section 106 consultation letters have also been sent to Native Hawaiian organizations, consulting parties, and/or interested persons that might attach significance to this area and have invited them to participate in the process. The mailing list is provided in *Attachment E*.

We welcome any comments that you may have on this project's proposed improvements.

We are particularly interested in any information you may have on the historic and cultural sites that have been recorded in the area. In addition, if you are acquainted with any persons or

organizations that are knowledgeable about the proposed project area or any descendants with ancestral, lineal, or cultural ties to, cultural knowledge or concerns for, and/or cultural or religious attachment to the proposed project area, then we would appreciate receiving their names and contact information.

We would appreciate a written response within thirty (30) calendar days from receipt of this letter. Please address any written comments to email: Chane.Hayashida@doh.hawaii.gov or the following address:

Attn: Chane Hayashida
Department of Health, Wastewater Branch
2827 Waimano Home Road, Room 207
Pearl City, HI 96782

Should you have any questions, please contact Chane Hayashida at (808) 586-4294.

Sincerely,

SINA PRUDER, P.E., CHIEF
Wastewater Branch

Attachments

CH:

c: Ramzi Mansour (via email at Ramzi.Mansour@hawaiicounty.gov)
Eric Takamura (via email at Eric.Takamura@hawaiicounty.gov)
Mark Grant (via email at MarkJ.Grant@hawaiicounty.gov)

References Cited

ESRI

2022 World Imagery. Esri, Redlands, California. Available online at www.arcgisonline.com/maps/World_Imagery.

Hawai‘i TMK Service

2010 Tax Map Keys [3] 2-1-011 and 2-1-013. Hawai‘i TMK Service, Honolulu

Rosendahl, Margaret L.K.

1988 *Archaeological Reconnaissance Survey for Environmental Impact Statement (EIS) Hilo Wastewater Treatment Facility Site, Land of Waiakea, District of South Hilo, Island of Hawaii (TMK:2-1-13:Por.12,13,20,22).* Paul H. Rosendahl, Ph.D., Inc., Hilo, Hawai‘i.

USGS (U.S. Geological Survey)

1994 Keaau Ranch USGS 7.5-minute topographic quadrangle. USGS Information Services, Denver, Colorado.

1995 Hilo USGS 7.5-minute topographic quadrangle. USGS Information Services, Denver, Colorado.

Wilkinson, Sarah, Olivier M. Bautista, and Hallett H. Hammatt

2023 *Archaeological Literature Review and Field Inspection for the Hilo Wastewater Treatment Plant Improvements Projects, Waiākea Ahupua‘a, South Hilo District, Hawai‘i Island, TMK: (3) 2-10-013:002 por.* Cultural Surveys Hawai‘i, Inc., Kailua, Hawai‘i.

Attachment A

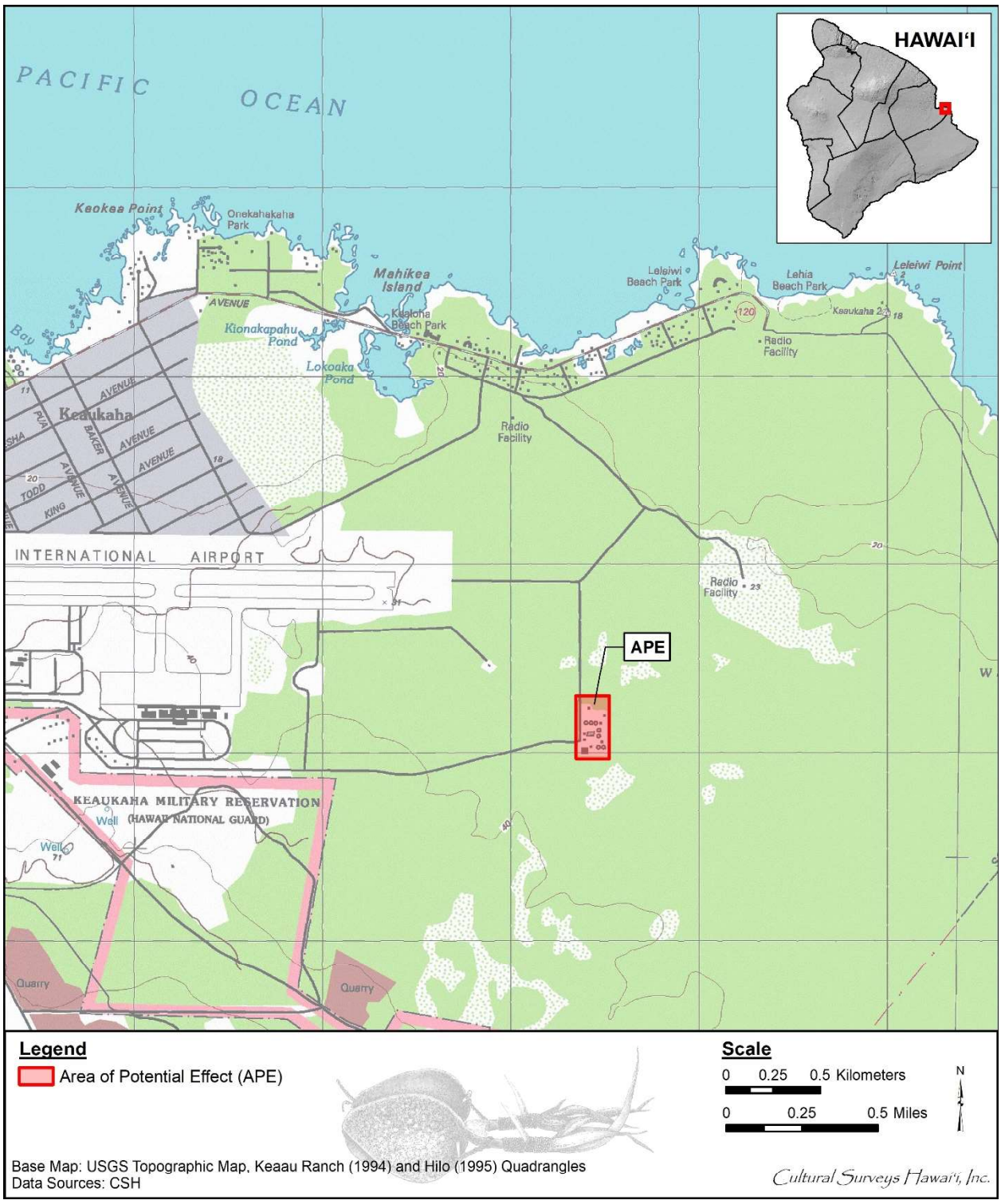


Figure 1. Portion of the 1994 Keaau Ranch and 1995 Hilo USGS 7.5-minute topographic quadrangles showing the location of the Area of Potential Effect (APE)

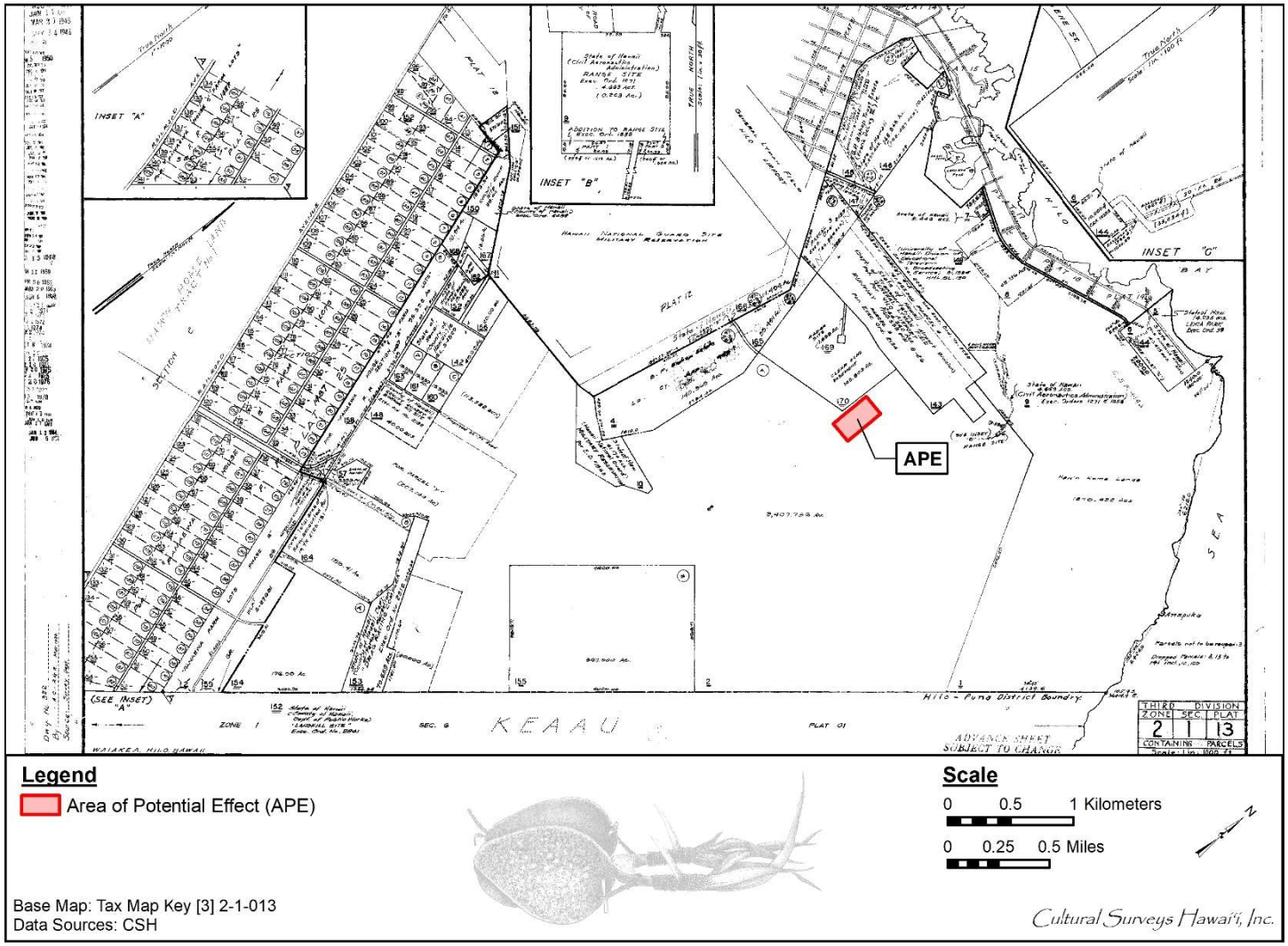
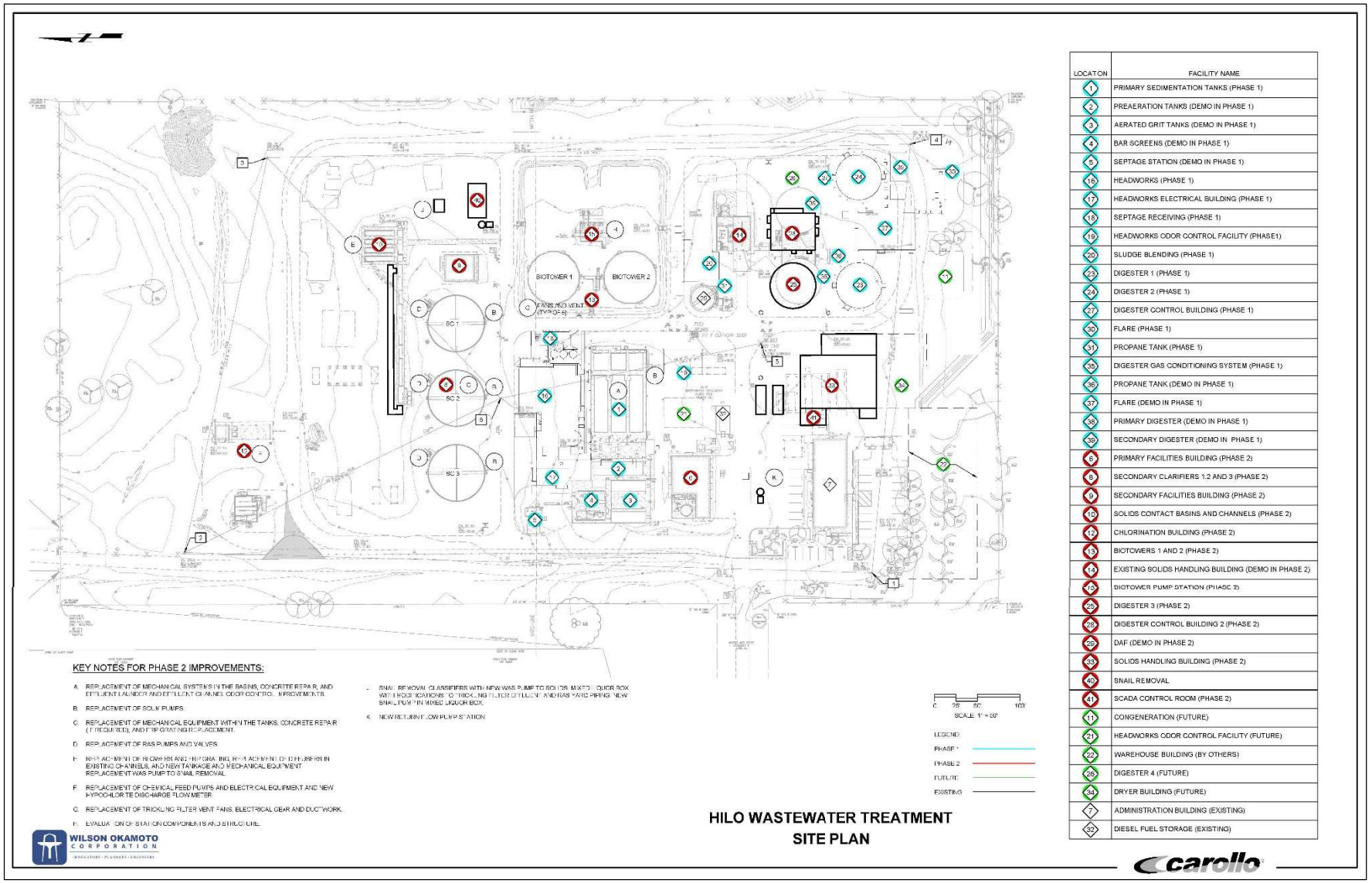


Figure 2. Tax Map Key (TMK) [3] 2-1-013 showing the APE within a portion of parcel 002 (Hawai‘i TMK Service 2010)

Figure 3. Aerial imagery (ESRI 2022) showing the location of the APE

Attachment B



LOCATION	FACILITY NAME
1	PRIMARY SEDIMENTATION TANKS (PHASE 1)
2	PREAERATION TANKS (DEMO IN PHASE 1)
3	AERATED GRIT TANKS (DEMO IN PHASE 1)
4	BAR SCREENS (DEMO IN PHASE 1)
5	SEPTAGE STATION (DEMO IN PHASE 1)
16	HEADWORKS (PHASE 1)
17	HEADWORKS ELECTRICAL BUILDING (PHASE 1)
18	SEPTAGE RECEIVING (PHASE 1)
19	HEADWORKS ODOR CONTROL FACILITY (PHASE1)
20	SLUDGE BLENDING (PHASE 1)
23	DIGESTER 1 (PHASE 1)
24	DIGESTER 2 (PHASE 1)
27	DIGESTER CONTROL BUILDING (PHASE 1)
30	FLARE (PHASE 1)
31	PROPANE TANK (PHASE 1)
35	DIGESTER GAS CONDITIONING SYSTEM (PHASE 1)
36	PROPANE TANK (DEMO IN PHASE 1)
37	FLARE (DEMO IN PHASE 1)
38	PRIMARY DIGESTER (DEMO IN PHASE 1)
39	SECONDARY DIGESTER (DEMO IN PHASE 1)
6	PRIMARY FACILITIES BUILDING (PHASE 2)
8	SECONDARY CLARIFIERS 1,2 AND 3 (PHASE 2)
9	SECONDARY FACILITIES BUILDING (PHASE 2)
10	SOLIDS CONTACT BASINS AND CHANNELS (PHASE 2)
12	CHLORINATION BUILDING (PHASE 2)
13	BIOTOWERS 1 AND 2 (PHASE 2)
14	EXISTING SOLIDS HANDLING BUILDING (DEMO IN PHASE 2)
15	BIOTOWER PUMP STATION (PHASE 2)
25	DIGESTER 3 (PHASE 2)
28	DIGESTER CONTROL BUILDING 2 (PHASE 2)
29	DAF (DEMO IN PHASE 2)
33	SOLIDS HANDLING BUILDING (PHASE 2)
40	SNAIL REMOVAL
41	SCADA CONTROL ROOM (PHASE 2)
11	CONGENERATION (FUTURE)
21	HEADWORKS ODOR CONTROL FACILITY (FUTURE)
22	WAREHOUSE BUILDING (BY OTHERS)
26	DIGESTER 4 (FUTURE)
34	DRYER BUILDING (FUTURE)
7	ADMINISTRATION BUILDING (EXISTING)
32	DIESEL FUEL STORAGE (EXISTING)

Figure 4. Site Plan showing various Phase 1, Phase 2, and Future improvements in relation to existing facilities

Attachment C

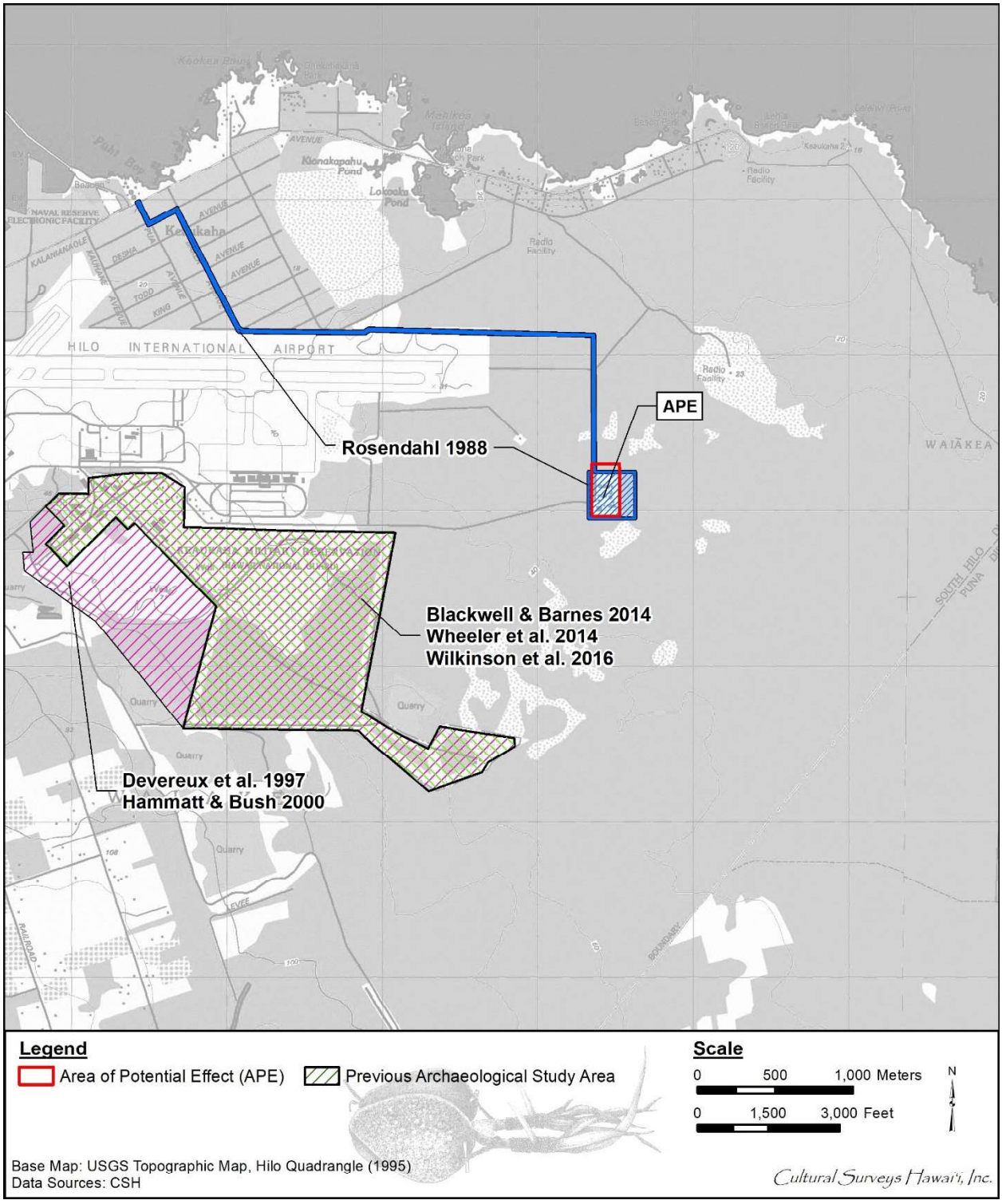


Figure 5. Portion of 1995 Hilo USGS topographic quadrangle showing the location of previous archaeological studies within 1.5 km of the APE; note, previous studies located beyond this distance not shown

Attachment D

Draft
Archaeological Literature Review and Field Inspection for the Hilo Wastewater Treatment Plant Improvements Projects, Waiākea Ahupua‘a, South Hilo District, Hawai‘i Island TMK: (3) 2-1-013:002 por.

Prepared for
Wilson Okamoto Corporation
on behalf of the
County of Hawai‘i, Department of Environmental Management (DEM)

Prepared by
Sarah Wilkinson, B.A.,
Olivier M. Bautista, B.A.,
and
Hallett H. Hammatt, Ph.D.

Cultural Surveys Hawai‘i, Inc.
Kailua, Hawai‘i
(Job Code: WAIAKEA 36)

March 2023

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Reference	Archaeological Literature Review and Field Inspection for the Hilo Wastewater Treatment Plant Improvements Projects, Waiākea Ahupua‘a, South Hilo District, Hawai‘i Island, TMK: (3) 2-10-013:002 por. (Wilkinson et al. 2023)
Date	March 2023
Project Numbers	Cultural Surveys Hawai‘i, Inc. (CSH) Job Code: WAIAKEA 36 Clean Water State Revolving Fund (CWSRF) Project Numbers: C150062-53 (Rehabilitation and Replacement Phase 1) and C150062-54 (Rehabilitation and Replacement Phase 2)
Investigation Permit Number	CSH completed the field inspection under archaeological fieldwork permit numbers 22-02 and 23-30, issued by the Hawai‘i State Historic Preservation Division (SHPD) per Hawai‘i Administrative Rules (HAR) §13-282.
Land Jurisdiction	State
Agencies	Hawai‘i State Department of Health (DOH); SHPD; County of Hawai‘i, Department of Environmental Management (DEM)
Project Funding	State of Hawai‘i (revolving fund); County of Hawai‘i
Project Proponent and Contact	County of Hawai‘i DEM Ramzi Mansour, Director 345 Kekuanaoa Street, Suite 41 Hilo, HI 96720 Attention: Dora Beck Email: cohdem@hawaiicounty.gov
Planning Consultant for the Project	John Sakaguchi AICP, Vice President & Director Wilson Okamoto Corporation 1907 South Beretania Street, Suite 400 Honolulu, HI 96826 Office: (808) 946-2277 Fax: (808) 946-2253 Email: jsakaguchi@wilsonokamoto.com
Project Location	The project area is located in the town of Hilo on the windward side of Hawai‘i Island. The project area comprises the county’s existing Hilo Wastewater Treatment Plant (WWTP) property, which is located at the eastern end of Kekuanaoa Place approximately 4,115 feet (about 0.78 mile) southeast of Runway 26 on Hilo International Airport. The project area is shown on a portion of the 1995 Hilo U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle on Hawai‘i Island (Figure 1), a tax map plat (Figure 2), and a 2021 aerial photograph (Figure 3).

Project Description and Related Ground Disturbance	The existing Hilo WWTP was constructed by the County in the early 1990s and, since then, has been operated the County of Hawai‘i Department of Environmental Management (COH-DEM). During construction of the Hilo WWTP, an area of 14.899 acres assigned to the County was cleared of vegetation and graded for construction. The developed facilities of the WWTP occupy an area of about 8.4 acres within the 14.899-acre area. The adjacent areas immediately surrounding existing plant facilities lie to the south, east and north of the 8.4-acre developed area. These cleared areas have largely remained undeveloped and have served as laydown and staging areas for WWTP maintenance and operations. The nearest residential area lies across the runway and over one (1) mile to the north of the WWTP. The relatively flat terrain, intervening vegetation and the distance provide a visual buffer between the residential area and the WWTP. In response to these condition assessments, the COH-DEM is proposing to undertake replacement and related improvements to critical facilities and then subsequently construct other new facilities to improve the treatment processes at the WWTP. These replacement facilities and subsequent improvements will be implemented in phases. The replacement facilities are sited nearby or adjacent to the ones being replaced within the existing developed area of the WWTP and within areas previously cleared adjacent areas to the south and east of the plant. Both the proposed replacement and new facilities are needed to ensure continued current operations and to meet future needs at the WWTP. In addition, facilities will be developed to meet current code requirements and to ensure the long-term operation of the plant functions. Phase 1 of the subject project consists of the replacement of critical core functions and facilities within the 8.4-acre developed area at the WWTP or within the adjacent previously cleared areas, including the following: • Replacement of the headworks, including associated improvements (septage receiving facility, headworks electrical building, and the odor control system); • Replacement of two anaerobic digesters, including associated improvements (sludge blending tanks with odor control facilities, digester control building, digester gas conditioning system, and waste gas flare; and • Demolition of the existing headworks and digester facilities upon completion of the replacement facilities. These Phase 1 improvements are depicted on Figure 4.

	As previously stated, the replacement facilities and associated improvements are sited nearby or adjacent to the facilities being replaced in areas which were cleared of vegetation during construction of WWTP. Subsequent Phases (identified as “Phase 2” and “Future”) of the proposed project consist of: • Facilities to upgrade and improve treatment processes with resultant improvement to the quality of the effluent, • Facilities for odor control, and • Facilities to improve overall operations of the WWTP. These improvements encompass a variety of improved or new plant components affecting secondary treatment, solids handling, warehousing, storage and maintenance functions, and operational control facilities (see Figure 4). Similarly, these project-related ground disturbances would include excavation and grading within the developed area of the plant site for the installation of new equipment, structures, buildings, and associated utilities. The replacement and upgrade facilities do not include water features or create temporary standing water areas that could attract wildlife, including various listed species of waterbirds. Also, no planting of trees is included in the construction plans. Further, during night-time cut over operations to avoid affecting seabirds that may be overflying the project site, the contractor will need to be notified that any lighting should be pointed so the luminaire is parallel to the ground and be sufficiently shielded to ensure no light escapes in an upward direction and off site. Further, to the extent possible, night-time lighting be avoided between September 15 and December 15. Lastly, no offsite construction activities are shown in the construction plans.
Project Area Acreage	The project area comprises a 14.899-acre (6.029-hectare) portion of 2,407.756-acre (974.384-hectare) parcel TMK: (3) 1-2-013:002
Document Purpose and Historic Preservation Regulatory Context	This investigation was conducted—through historical, cultural, and archaeological background research and a field inspection of the project area—to determine the likelihood that archaeological historic properties may be affected by the project. This document is intended to facilitate the project’s planning and support the project’s historic preservation review compliance. This investigation does not fulfill the requirements of an archaeological inventory survey (AIS) investigation, per HAR §13-276.

	This information may also be used to support the DEM's consultation with the SHPD regarding the project's necessary historic preservation review steps pursuant to HAR §13-275. The Hilo Wastewater Treatment Plant project involves funding from the Clean Water State Revolving Fund (CWSRF) and is therefore an undertaking requiring compliance with Section 106 of the National Historic Preservation Act (NHPA) and the Archaeological and Historic Preservation Act (AHPA). The EPA administers the CWSRF program, which authorizes capitalization grants to state agencies in Region 9, including the Hawai‘i State DOH. In turn, the DOH Wastewater Branch provides assistance to county and state agencies for water pollution control projects. In October 2015 the EPA authorized the DOH to undertake consultation with the State Historic Preservation Officer (SHPO), Native Hawaiian organizations (NHOs), and interested parties for projects funded under the CWSRF. Section 106 consultation will be initiated at a future date for this project.
Natural Environment	The Hilo WWTP is situated on the windward side of Hawai‘i Island, on the lower eastern slope of Mauna Loa in the *ahupua‘a* (traditional land division) of Waiākea. The plant is within a generally undeveloped area on the eastern outskirts of Hilo Town. It is 1.8 km (1.2 miles) inland of the Keaukaha coast, at approximately 10 m (33 feet [ft]) above mean sea level (amsl). Rainfall in the vicinity of the plant averages 130 inches per year (Giambelluca et al. 2013). No perennial streams or other surface water features are in proximity. The natural topography in the vicinity of the Hilo WWTP is mildly sloping toward the coast, which is to the north. The plant location has been subjected to extensive prior disturbance associated with development of the existing sewage facilities. This development has completely altered the natural terrain throughout the plant (and project area). According to the U.S. Department of Agriculture (USDA) Soil Survey Geographic (SSURGO) database (2001) and soil survey data gathered by Sato et al. (1973), the majority of the project area overlies Papai extremely stony muck 3–25% slopes (rPAE; Figure 5). This soil type is characterized as "well-drained, thin, extremely stony organic soils over fragmental Aa [rough, broken] lava" … "used mostly for woodland" (Sato et al. 1973:46). Small areas at the northwestern corner and along the southern boundary of the project area are indicated to overlie *pāhoehoe* (smooth, unbroken) lava flows (rLW; see Figure 5). The Hilo WWTP is devoid of vegetation aside from maintained grassy areas surrounding the fenced plant facility, a small area of secondary forest consisting of predominately invasive species at the northeastern corner of the property, and some ornamental landscaping located

	around the administrative buildings at the plant entrance. The plant property is surrounded by dense forest consisting of a mix of native and introduced species.
Built Environment	The project area is within the existing Hilo WWTP which is accessed from Kekuanaoa Place (see Figure 3). The Hilo WWTP is approximately 1.3 km (0.78 miles) southeast of Runway 26 at Hilo International Airport. The nearest residential area lies across the runway and over one (1) mile to the north of the WWTP. During construction of the Hilo WWTP, the entire 14.899-acre project site was cleared of vegetation and graded. The approximately 8.4-acre improved portion of the property comprises the existing WWTP facility. Parking areas and administration buildings are located in the southwestern corner of the facility, and the remainder of the plant contains various sewage facilities, support infrastructure, and diesel fuel storage (see Figure 3 and Figure 4). The ground surface is level throughout with paved and graveled areas. The areas immediately surrounding the 8.4-acre developed area to the south, east, and north have largely remained undeveloped and have served as laydown and staging areas for WWTP maintenance and operations.
Background Research Methods	Background research included a review of previous archaeological studies on file at the SHPD; review of documents at Hamilton Library of the University of Hawai‘i, the Hawai‘i State Archives, the Hawaiian Mission Children’s Society Library and Archives, the Hawai‘i Public Library, and the Bishop Museum Archives; study of historic photographs at the Hawai‘i State Archives and the Bishop Museum Archives; and study of historic maps at the Survey Office of the Department of Land and Natural Resources. Historic maps and photographs from the CSH library were also consulted. In addition, Māhele records were examined from the Waihona ‘Aina database (Waihona ‘Aina 2022). This research provided the environmental, cultural, historic, and archaeological background for the project area.
Background Research Summary	Waiākea is a large *ahupua‘a* (traditional land division) encompassing some 95,000 acres. The rich upland resources of taro and sweet potato and abundant marine resources, particularly shrimp and fish, made Waiākea very valuable to the Hawaiian people (Fornander 1916-1919; Kelly et al. 1981). According to Hawaiian folklore and legends, gods and goddesses including Pele, Hi‘iaka, and Pana‘ewa frequented Waiākea. Many legends have associated Waiākea with Hawaiian *ali‘i* (chief) since the sixteenth century and describe it as a gathering place for ceremonies (Emerson 1915; Fornander 1916-1919; Kamakau 1961; Noglemeier 2006; Thrum 1923). In 1979 Holly McEldowney prepared an archaeological and historical literature search and research design as part of a lava flow control study

	for Hilo (McEldowney 1979). In her report, McEldowney describes five zones of land use and associated resources as observed during the early historic period. The project area, situated at approximately 33 ft amsl, falls within the lower limits of Zone II (Figure 6), the Upland Agricultural Zone, which was generally characterized by open grassland used for planting (McEldowney 1979:19–20). To some degree these grasslands in Hilo were likely formed by human activity such as swidden agriculture, which would have reduced over time the lowland *‘ōhi‘a* forest like that still present today in portions of Pana‘ewa (McEldowney 1979:21–24). According to Handy and Handy (1972:131–132), the Pana‘ewa forest did also contain house sites with associated planting areas. An 1851 map of Waiākea (Figure 7) depicts the project area within a broad, coastal “Hala Woods” situated *makai* of the “Panaewa Woods.” Thus, the project area was likely used for collection of natural resources, such as the prevalent *lauhala* (leaves of the *hala* plant) used for weaving, and for intermittent, small-scale agriculture, with the natural depressions in lava flows used for mulch-type agriculture. The shift from a subsistence-based to a market-based economy began in the early 1800s following Western Contact with the Hawaiian Islands. This shift was precipitated by the sandalwood trade, arrival of whalers, introduction of imported food crops (Kelly et al. 1981). During this time Hilo was becoming an important port town. The establishment of the American Board of Commissioners for Foreign Missions (ABCFM) station in Hilo during this time also resulted in significant cultural changes (Kelly et al. 1981). In the Māhele of 1848 Waiākea Ahupua‘a was held as Crown Land. When Kamehameha I died in 1819, his son Liholiho had received the lands. Two *‘ili kū* (subdivisions of an *ahupua‘a* which pay tribute to the district chief) were awarded to Victoria Kamāmalu, granddaughter of Kamehameha I and heir to Ka‘ahumanu, as part of Land Commission Award (LCA) 7713. These *‘ili kū* included Pi‘oipi‘o near Hilo Bay, and Honohononui, a long strip of land in Keaukaha located west of the project area which extended *mauka* to the vicinity of the road to Puna (see Figure 7). Hudson (1932:246) documented a portion of this trail in the vicinity of the present Keaukaha Military Reservation, calling it the “Puna-Kau Trail.” According to the Māhele database (Waihona ‘Aina 2022), 28 LCA parcels were granted within Waiākea, most of which were focused around the edges of the large coastal fishponds to the west of the project area near Hilo Bay. Land use information from the *kuleana* or commoner awards generally refer to cultivated fields with house lots,

	indicating habitation and agricultural production within the same zone. No LCA are indicated in proximity to the project area. During the mid-nineteenth century, sugarcane plantation agriculture and ranching came to prominence in Waiākea Ahupua‘a. The Waiakea Sugar Plantation comprised large tracts of land in Hilo, west of Keaukaha, and other plantations and mills cropped up around the district. The Waiakea Plantation and Mill, as well as the road to Puna, are shown on an 1886 map of Hawai‘i Island (Figure 8). By the 1870s, the road to Puna was a functioning horse trail, likely fitting Apple's (1965:65) Type C classification. Hudson (1932:246) described it as "about 4 feet wide, paved with bits of aa lava and flat stones, banked on the sides, and built up in crossing gullies." In 1879, a 3-mile railroad was constructed from Waiakea Mill to the cane fields, "the first in the 'Sandwich Islands' to haul sugar with a steam locomotive" (Condé and Best 1973:117). This railroad would be expanded substantially over the coming decades. Portions of the railroad and various plantation mills are illustrated on a 1901 map (Figure 9), which indicates little development in Keaukaha and the vicinity of the project area. Ranching was also primarily focused west of Keaukaha, in the portions of upland Waiākea too rocky for sugarcane. Land use in the project area vicinity likely continued to be focused on procurement of forest resources and small-scale intermittent, small-scale agriculture. The 1900s brought the onset of urban development to the district of South Hilo. Several major construction projects were undertaken between 1900–1930, including new wharves and boat landings, bridges, the Hilo breakwater, and the Waiolama dredge-and-fill project near the bay (Kelly et al. 1981:287–291). A 1914 map (Figure 10) shows an expansion of the railroad to the new wharf at Kūhi‘ō Bay (completed in 1913) near the new Hilo Breakwater, northwest of the project area. Figure 10 also depicts the Puna Trail passing south of the project area, an unlabeled trail west of the project area that intersected the Puna Trail, and another unlabeled trail north of the project area that connected with the trail to the west. In 1914 the Governor of the Territory of Hawaii set aside 216.43 acres of land in Waiākea for a National Guard of Hawaii rifle range. A 1915 map (Figure 11) depicts the new rifle range in the vicinity of the present Keaukaha Military Reservation, west of the project area. By 1927, the military reservation had expanded to nearly 1,000 acres (Wheeler et al. 2014:37). Figure 11 also shows other recent developments including the Hilo Breakwater, wharves, expanded Hilo Railroad, and Waiākea House Lots in relation to the project area and the *‘ili kū* of Honohononui.

	The Keaukaha Hawaiian Homestead settlement was also developed in the 1920s. The settlement, depicted northwest of the project area in Figure 12, was the second established in the state under the Hawaiian Homes Commission Act and was described as “an unqualified success” (Kelly et al. 1981:229). By 1931 more than 200 house lots were occupied by a population of over 1,200 (Kelly et al. 1981:233). Development of the Hilo Airport, adjacent to the Keaukaha Homestead, also began in the 1920s (Kelly et al. 1981:230). The onset of World War II resulted in expansion and designation of Hilo airport as General Lyman Field by the U.S. military. This and subsequent airport expansions adversely affected the adjacent Keaukaha homestead community, displacing many lessees (Kelly et al. 1981:234–235). Also during this time period, the April 1946 tsunami caused extensive damage and loss of life in Hilo (Kelly et al. 1981:291). The road into Keaukaha was washed out, and the breakwater and piers at the Kūhi‘ō wharf were also damaged. Following Statehood in 1959 and the decline of the sugar industry, tourism became an economic mainstay for the Hilo area. Another tsunami in 1960 caused great damage throughout Hilo, and subsequently portions of the town were reorganized to minimize devastation from future tsunami (Clark 1985:16). A 1963 topographic map (Figure 13) depicts the continued development in the vicinity of the project area. In 1967 a sewage treatment plant was constructed at Puhi Bay, at the coast fronting the Keaukaha homesteads (Kelly et al. 1981:248, 292). This treatment plant is visible on a 1977 orthophoto (Figure 14). In 1989, General Lyman Field was renamed as Hilo International Airport. The airport is in the process of being modernized through a variety of projects. In 1994 a new Hilo wastewater treatment plant was completed southeast of the airport at its current location. The treated effluent is gravity fed to the ocean outfall located at Puhi Bay. The old sewage plant site at Puhi Bay contains a wastewater pump station and an aquaculture research and training center. The Keaukaha Military Reservation continues to be utilized by the Hawaii National Guard.
Prior Archaeological Studies Summary	Six previous archaeological studies have been identified within 1.5 kilometers (km) (0.9 miles) of the current project area. These studies are depicted in relation to the project area in Figure 15 and summarized in Table 1. Of these studies, only one (Rosendahl 1988) overlaps the current project area. No historic properties have been previously documented within 1 km of the current project area. Paul H. Rosendahl, Inc. (PHRI) in 1988 conducted an archaeological reconnaissance survey for an environmental impact statement (EIS) for the proposed Hilo Wastewater Treatment Plant project (Rosendahl

	1988; see Figure 15). No archaeological features were identified during the reconnaissance and no additional archaeological work was recommended.
Fieldwork Effort and Findings	The various components of the project area were inspected over three separate days: 12 July 2022, 7 October 2022, and 31 January 2023. Fieldwork was conducted by CSH Project Directors Olivier M. Bautista, B.A., and Sarah Wilkinson, B.A., under the general supervision of Principal Investigator Hallett H. Hammatt, Ph.D. The field inspection generally consisted of a 100% pedestrian coverage of the project area. Photographs were taken of the general project area, as well as each of the Phase 1, Phase 2, and Future improvement locations shown on Figure 4. A Garmin 60CSx handheld GPS device was carried by the crew to identify the boundaries of the project area and to record any points of interest. The field inspection effort confirmed the entire project area—comprising the entire 14.899-acre WWTP site—has been subjected to extensive prior disturbance related to the development of the existing treatment plant. All areas within the WWTP property boundary—both inside and outside the facility's security fence—have been graded and subjected to variable levels of additional development, completely altering the natural terrain. Representative photographs (Figure 16 through Figure 28) depict the built environment within the fenced plant facility. All but three of the planned improvements are within this portion of the project area, which consists of existing modern buildings and structures, open gravel areas, parking areas, and driveways. The perimeter between the plant security fence and the property boundary is generally maintained, open grassy areas that have been used for stockpiling and staging (Figure 29 through Figure 32). A gravel roadway located along the western property boundary within the perimeter area accesses lands north of the project area (Figure 33). A portion of the area to the north of the security fence has not been used or maintained in recent years, and now contains a dense canopy of invasive vegetation. Clear signs of prior grading and disturbance were observed throughout the limits of this forested area (Figure 34 and Figure 35). No archaeological features representing potential historic properties were encountered in any portion of the project area.
Potential for Project Effect on Historic Properties	Background research and the results of the field inspection indicate an absence of known or potential historic properties within the project area.

Recommendations	Based on the absence of any surface archaeological features in the project area and the extent of prior ground disturbance, further archaeological study is not recommended for the Hilo Wastewater Treatment Plant Improvements Projects. Consultation with the SHPD should be sought for concurrence with this recommendation, and to obtain any further determinations of historic preservation requirements for the project.

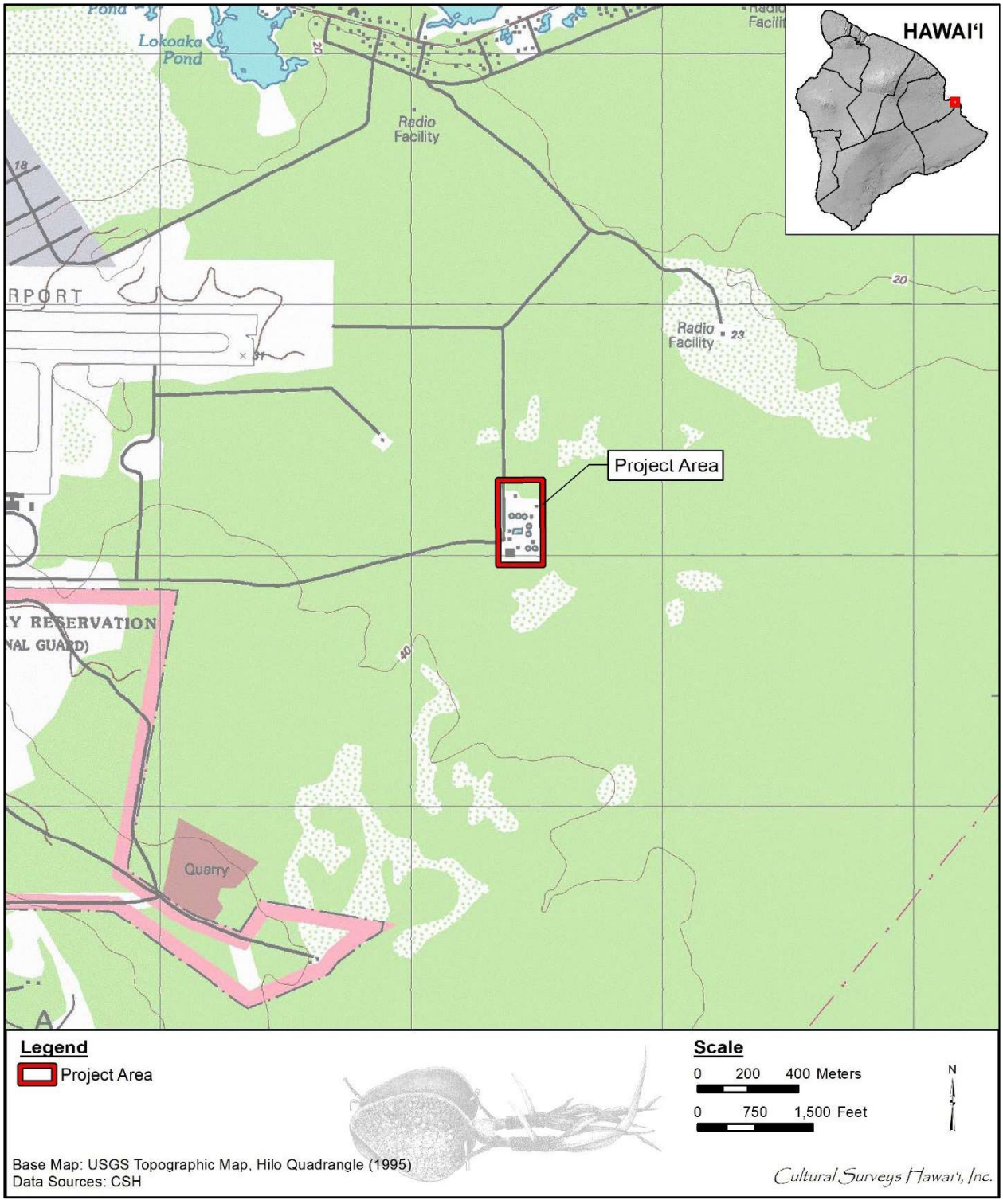

Figure 1. Portion of the 1995 Hilo USGS 7.5-minute topographic quadrangle showing the project area in relation to landmarks such as the airport runway, rock quarry, radio facilities, and the coastline to the north

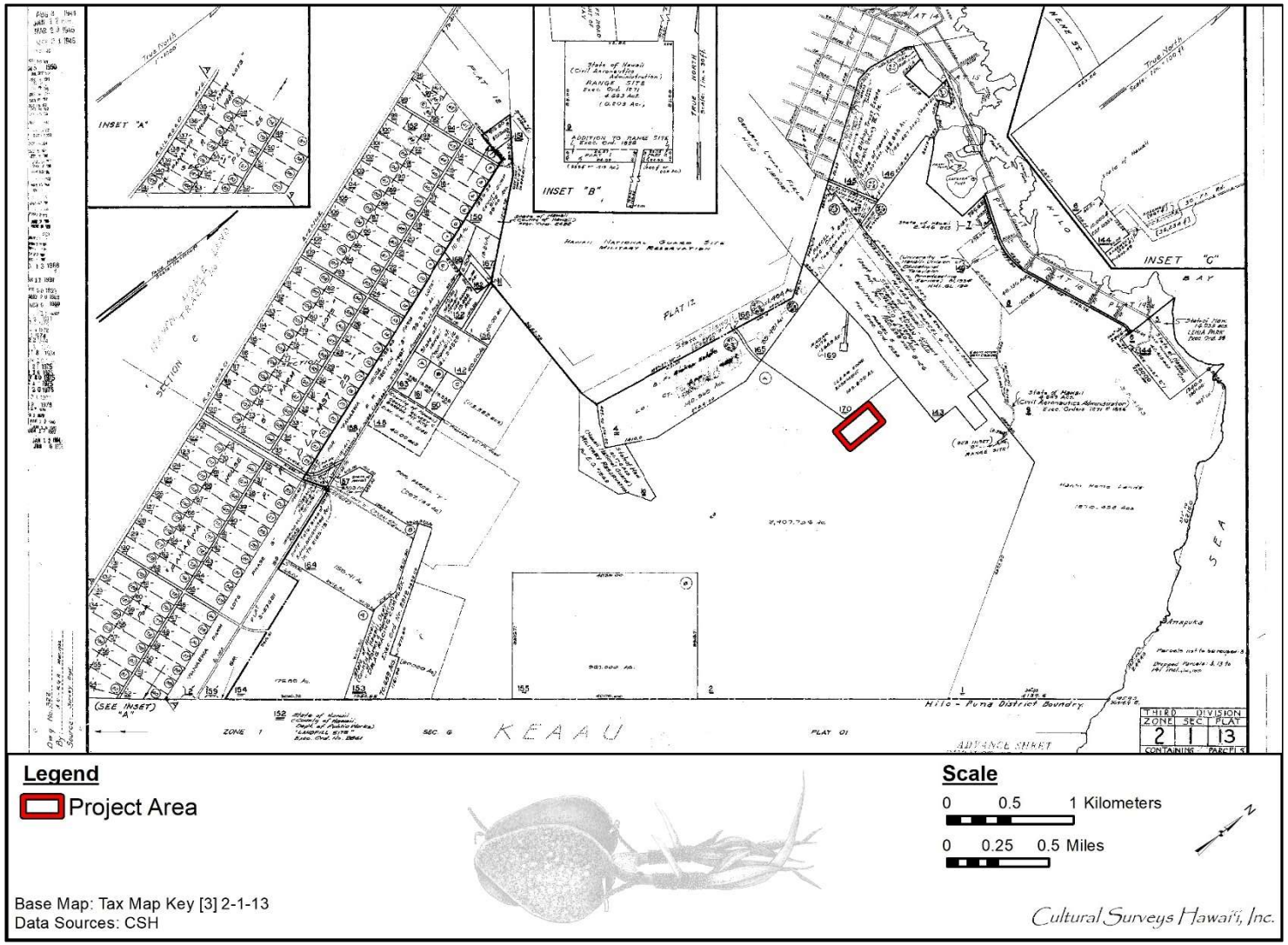

Figure 2. Tax Map Key (TMK) (3) 2-1-013 showing the project area at the existing WWTP in a portion of parcel 002 (Hawai‘i TMK Service 2010)

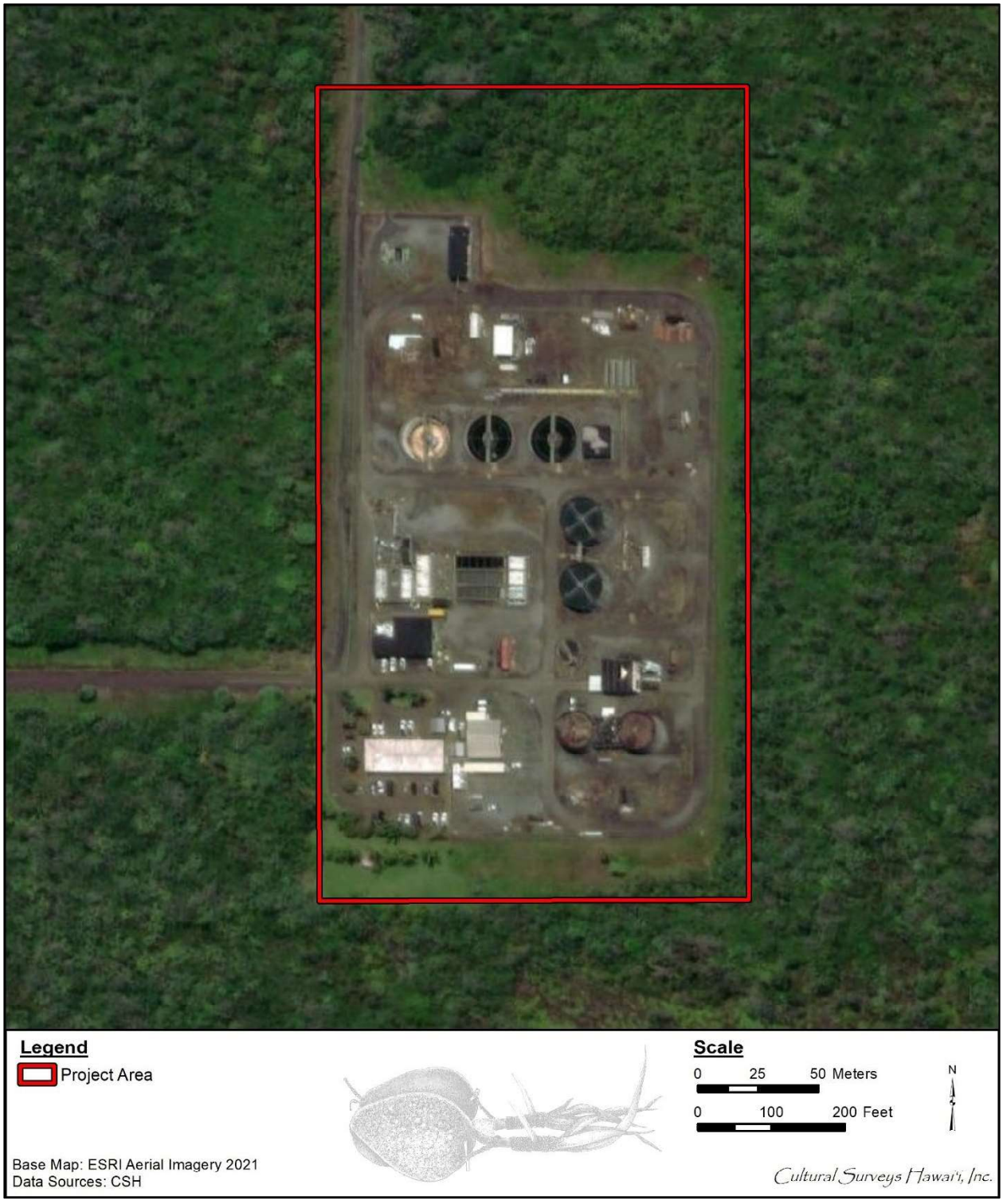

Figure 3. Aerial photograph (ESRI 2021) showing the project area

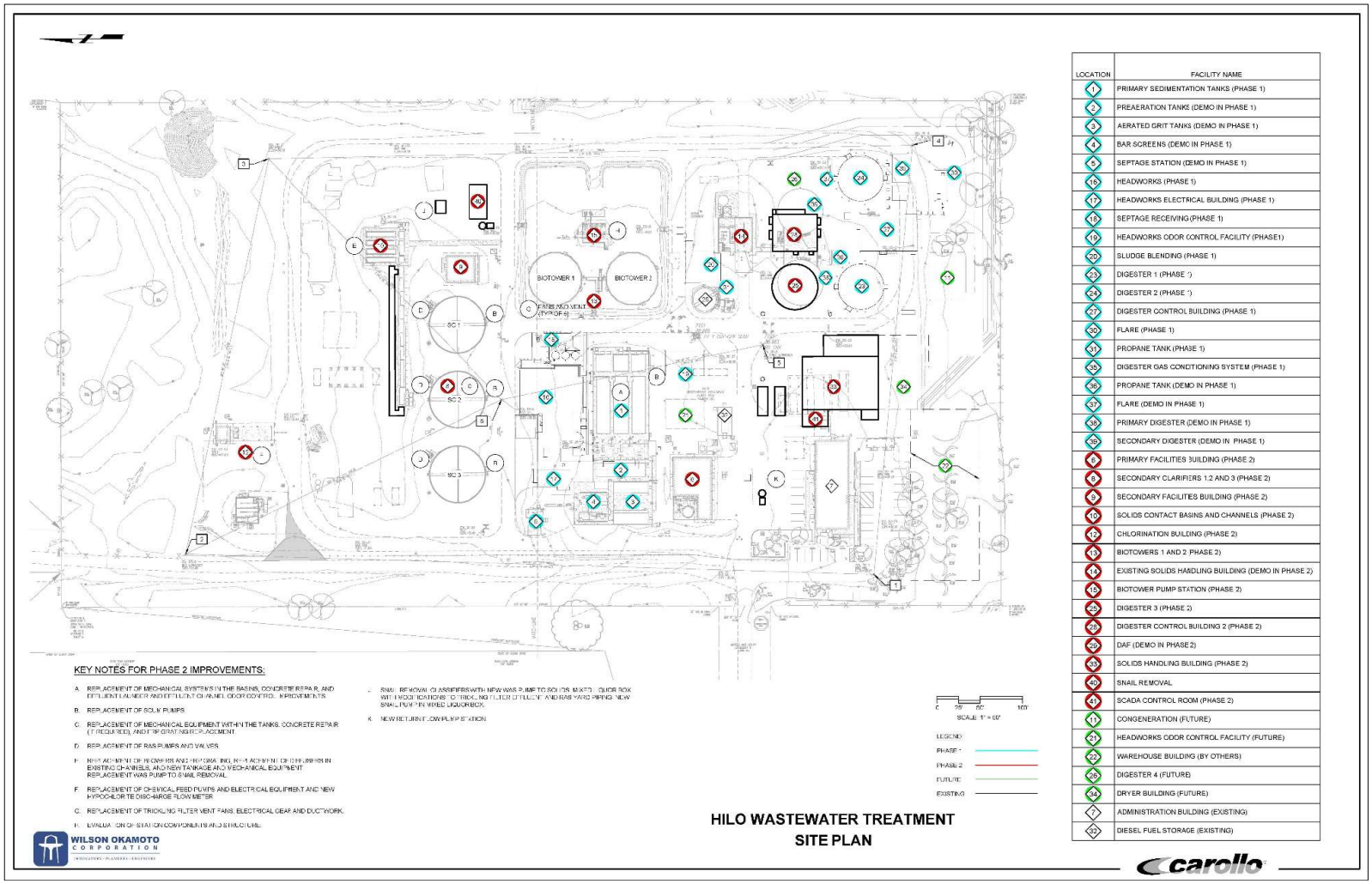

Figure 4. Conceptual site plan showing various Phase 1, Phase 2, and Future improvements in relation to existing facilities (courtesy of client)

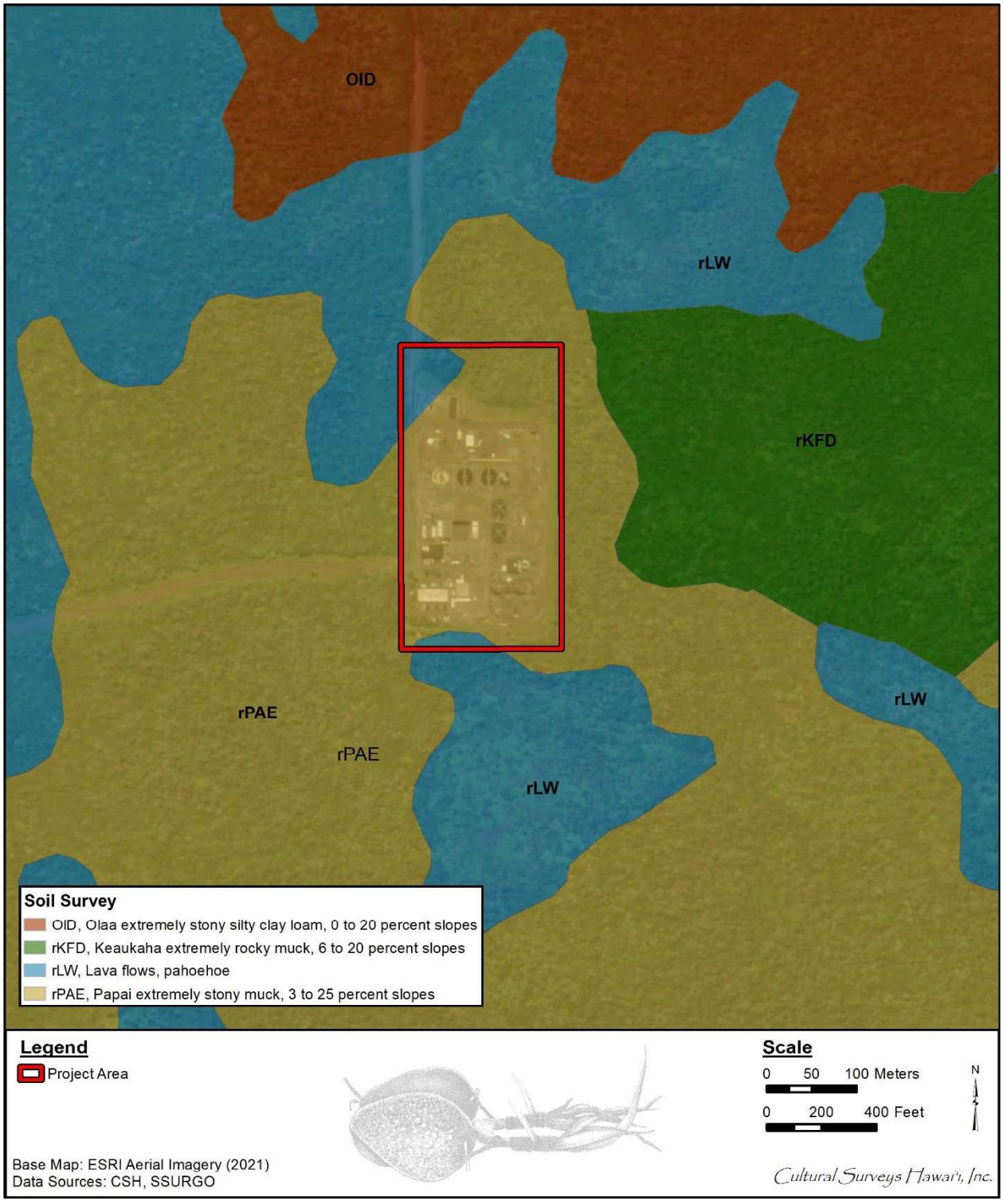

Figure 5. Overlay of *Soil Survey of the Island of Hawaii* (Sato et al. 1973), indicating soil and land types within project area (USDA SSURGO 2001)

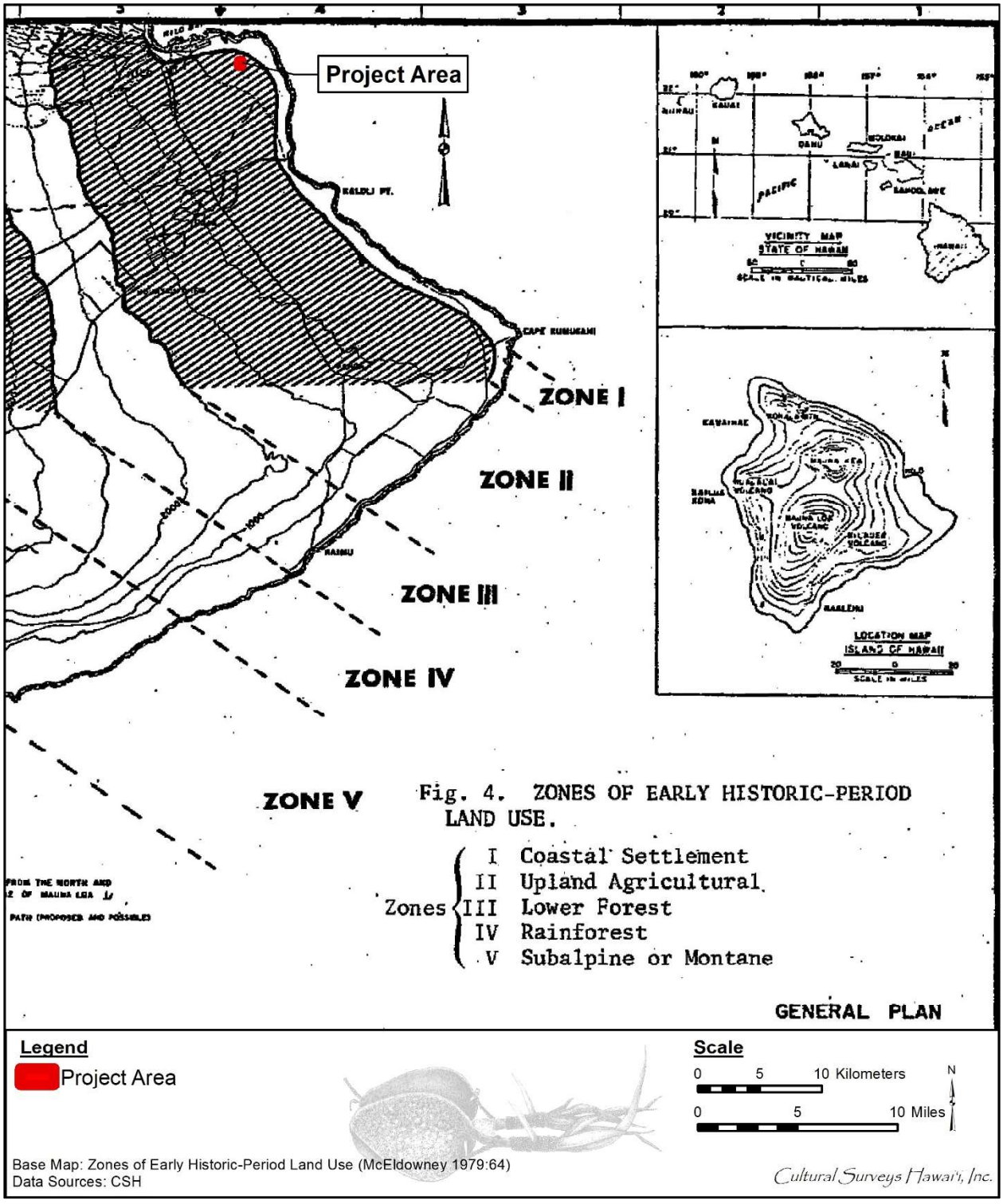

Figure 6. Map showing Zones of Early Historic-Period Land Use as described by McEldowney (1979:64)

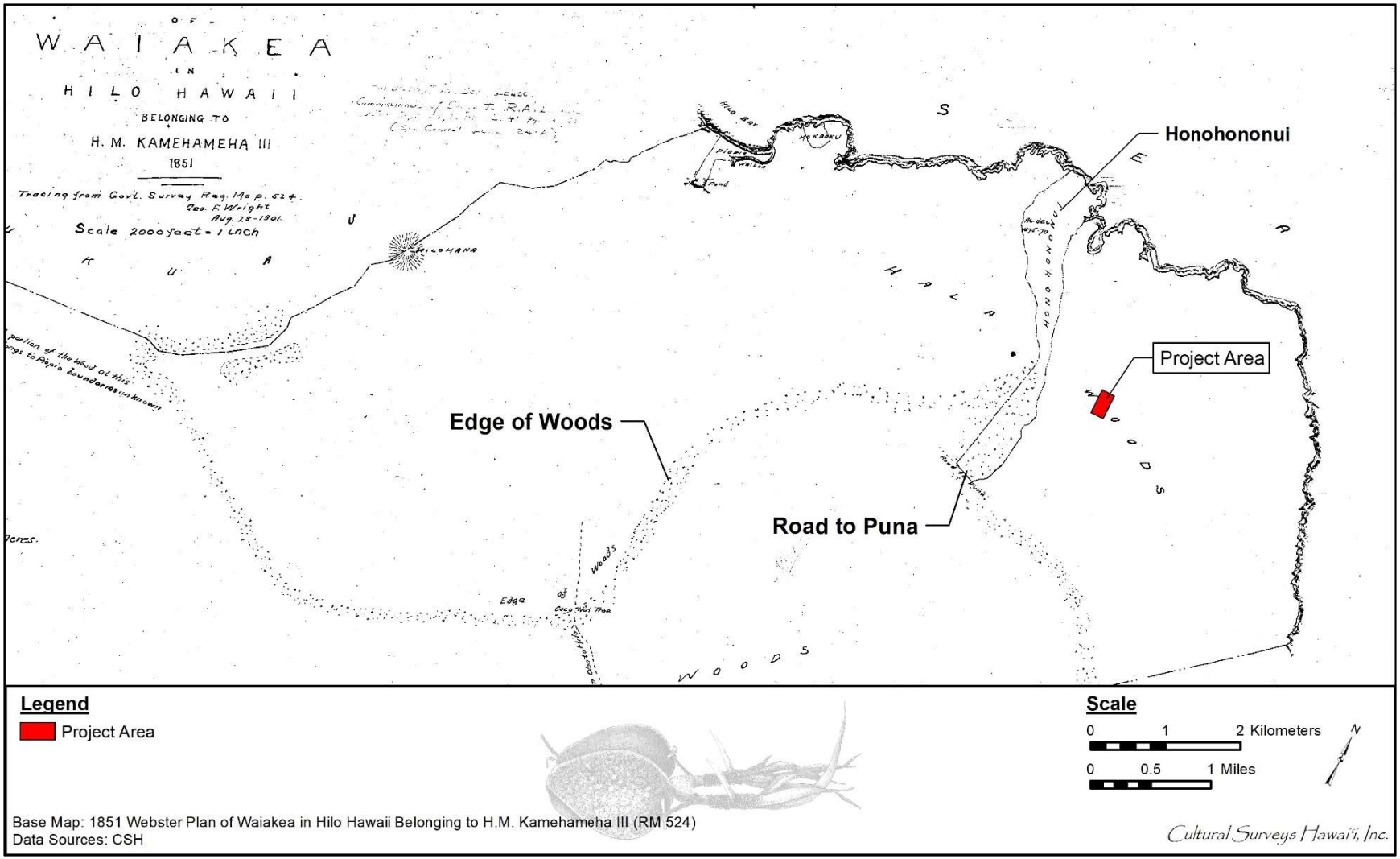

Figure 7. Portion of the 1851 Webster Plan of Waiakea, showing the location of the project area (in red) within the “Hala Woods,” *makai* of the “Road to Puna” and “Panaewa woods,” and east of the *ʻili kū* of “Honohononui”

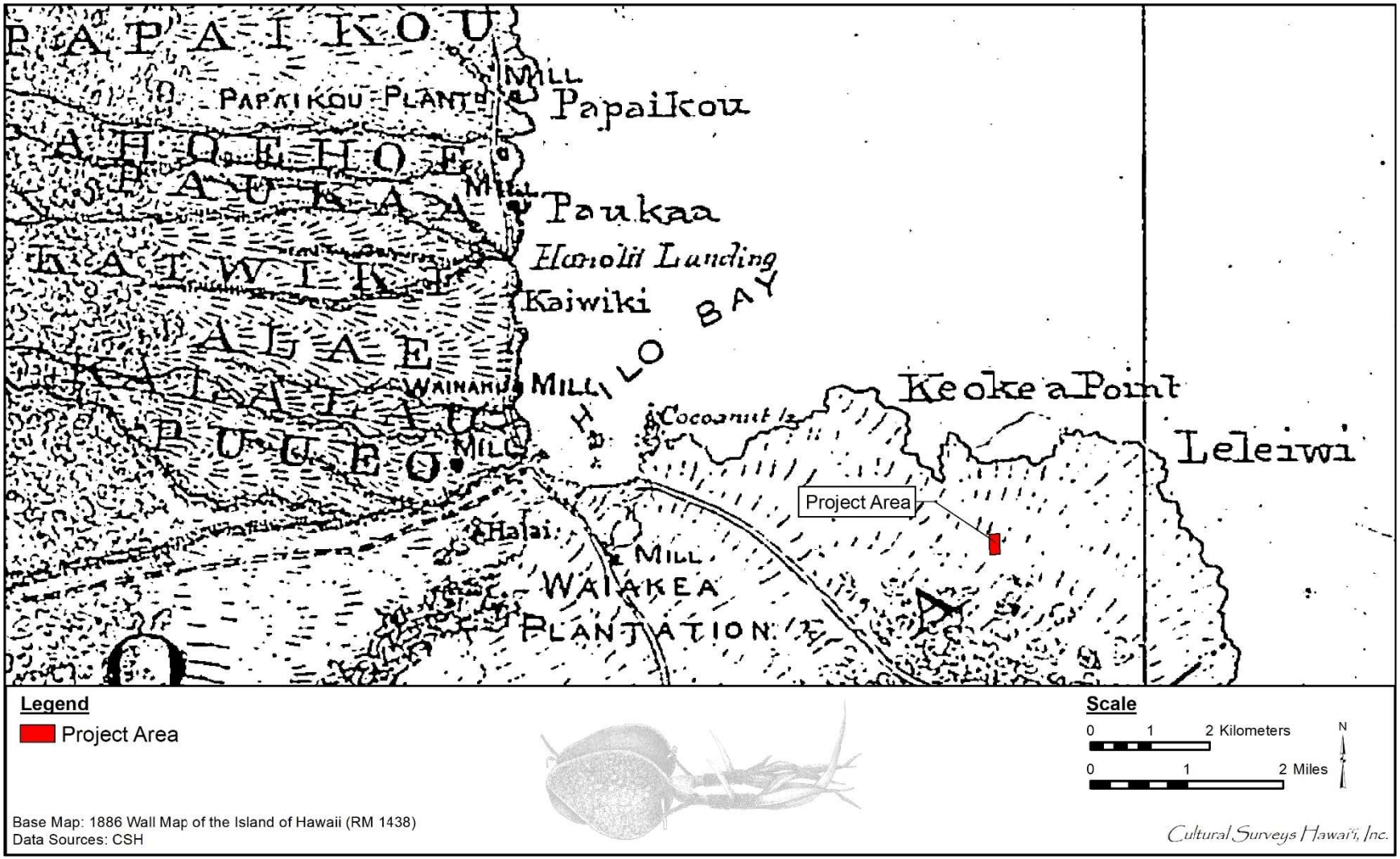

Figure 8. Portion of 1886 Wall map of the Island of Hawai‘i showing the project area

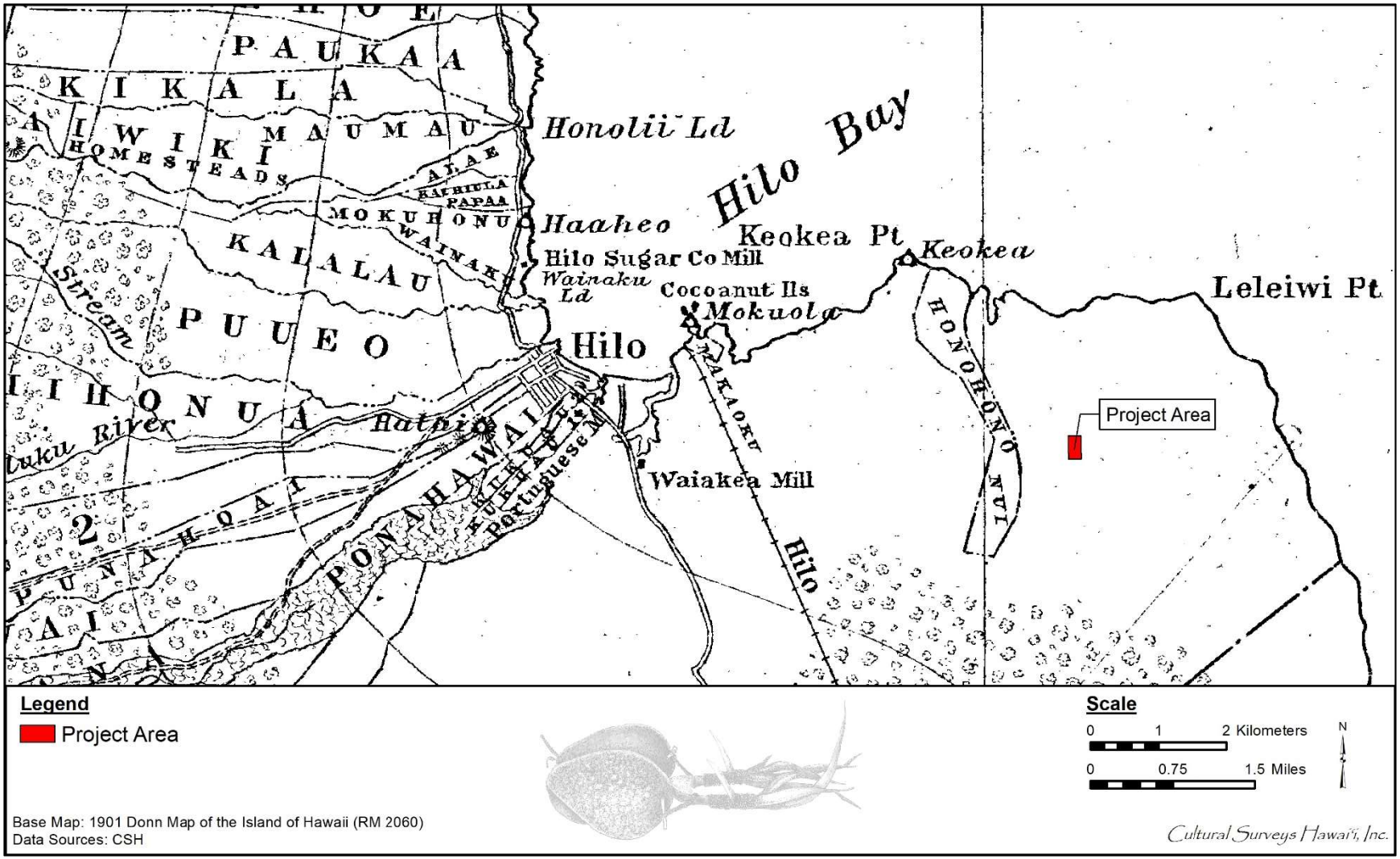

Figure 9. Portion of 1901 Donn map of the Island of Hawai‘i showing the project area in relation to the Waiakea Mill, Hilo Railroad, and other developments

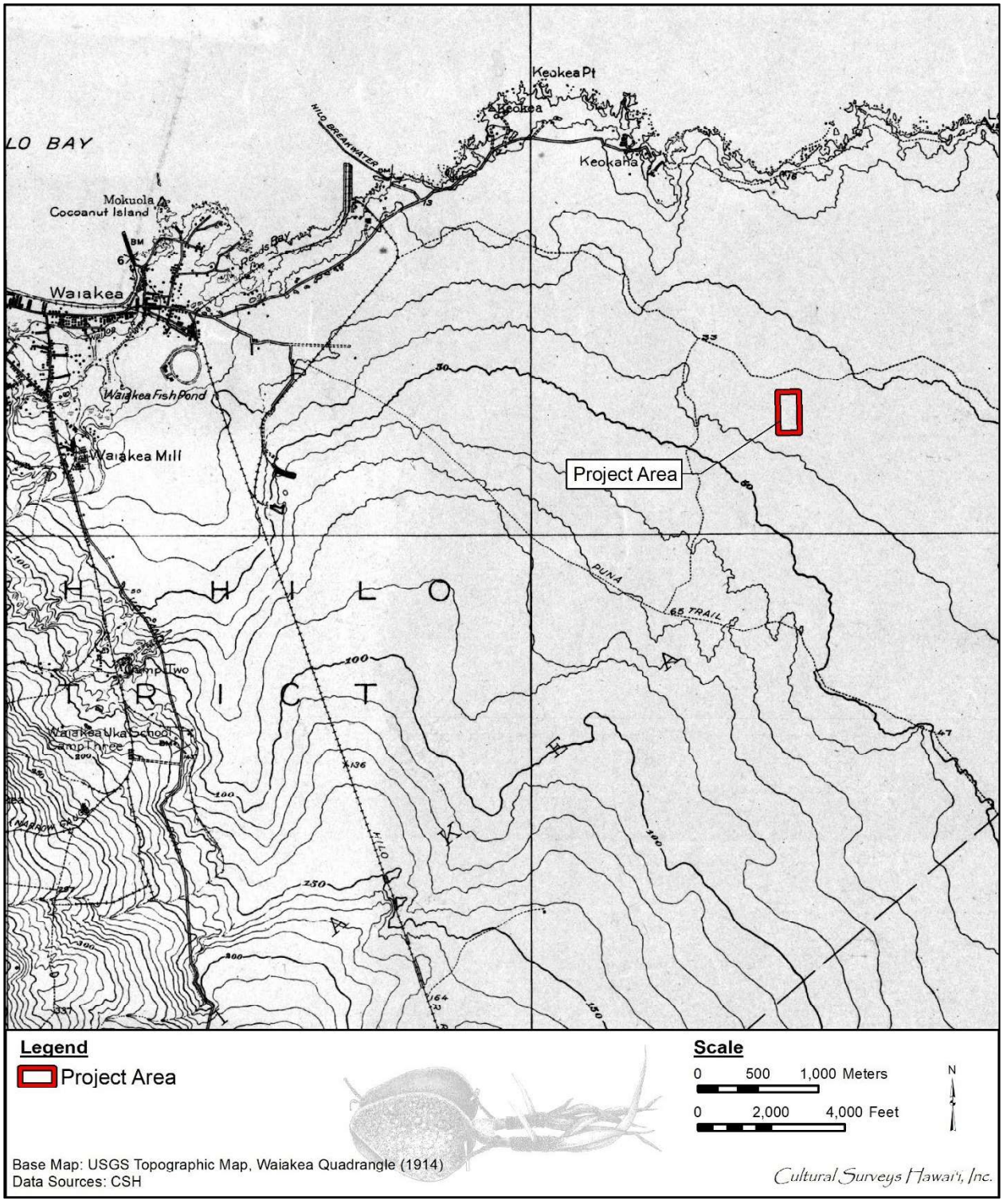

Figure 10. Portion of the 1914 Waiakea USGS 7.5-minute topographic quadrangle showing the project area in relation to the Waiakea Mill, Hilo Railroad, and the Puna Trail

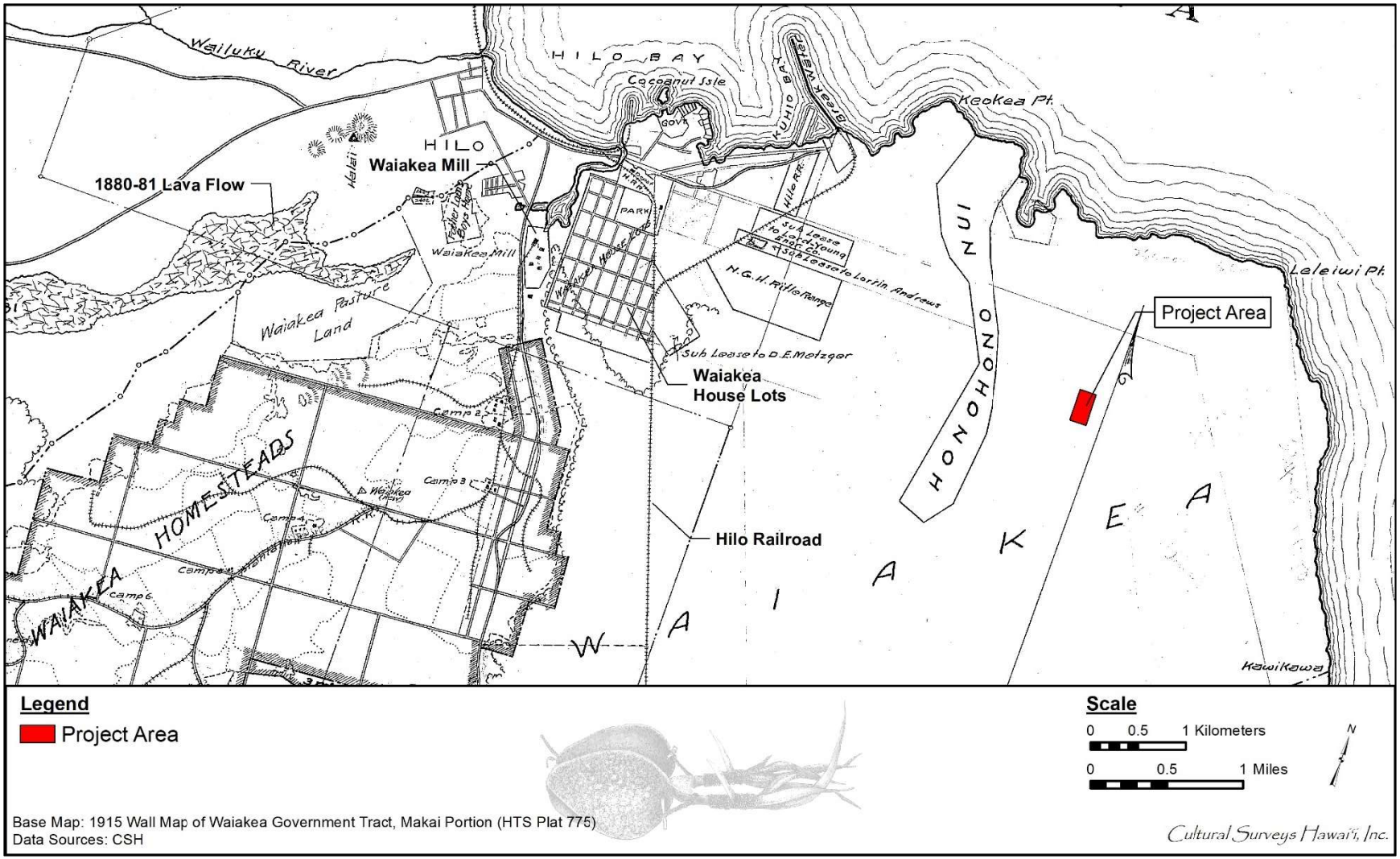

Figure 11. Portion of the 1915 Wall map of Waiakea Government Tract showing the project area in proximity to developments including the National Guard of Hawaii Rifle Range, Hilo Breakwater, wharves, Hilo Railroad, and Waiākea House Lots

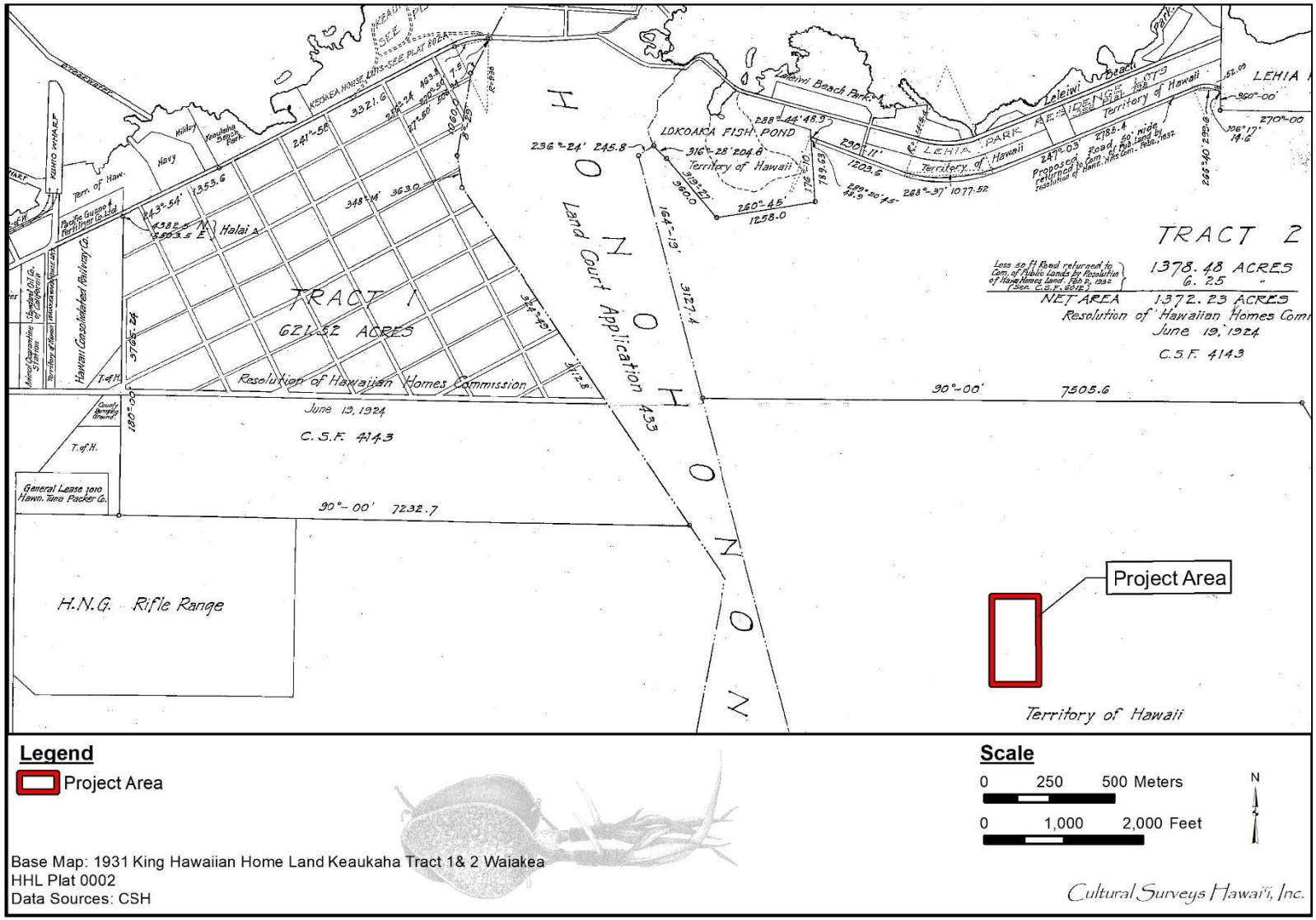

Figure 12. 1931 King map of Hawaiian Homeland Keaukaha Tract showing the location of the project area

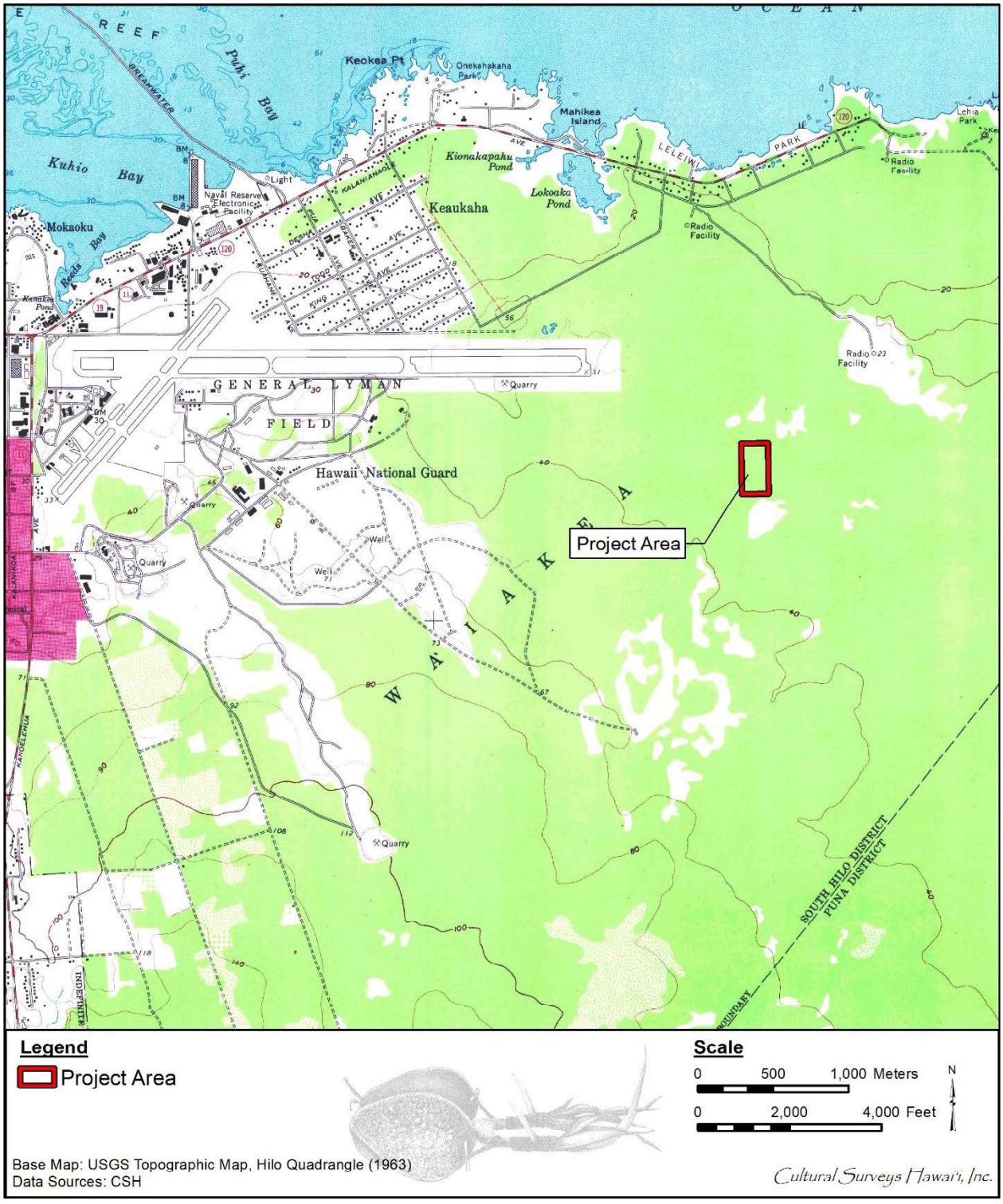

Figure 13. Portion of the 1963 Hilo USGS 7.5-minute topographic quadrangle showing continued development in the vicinity of the project area

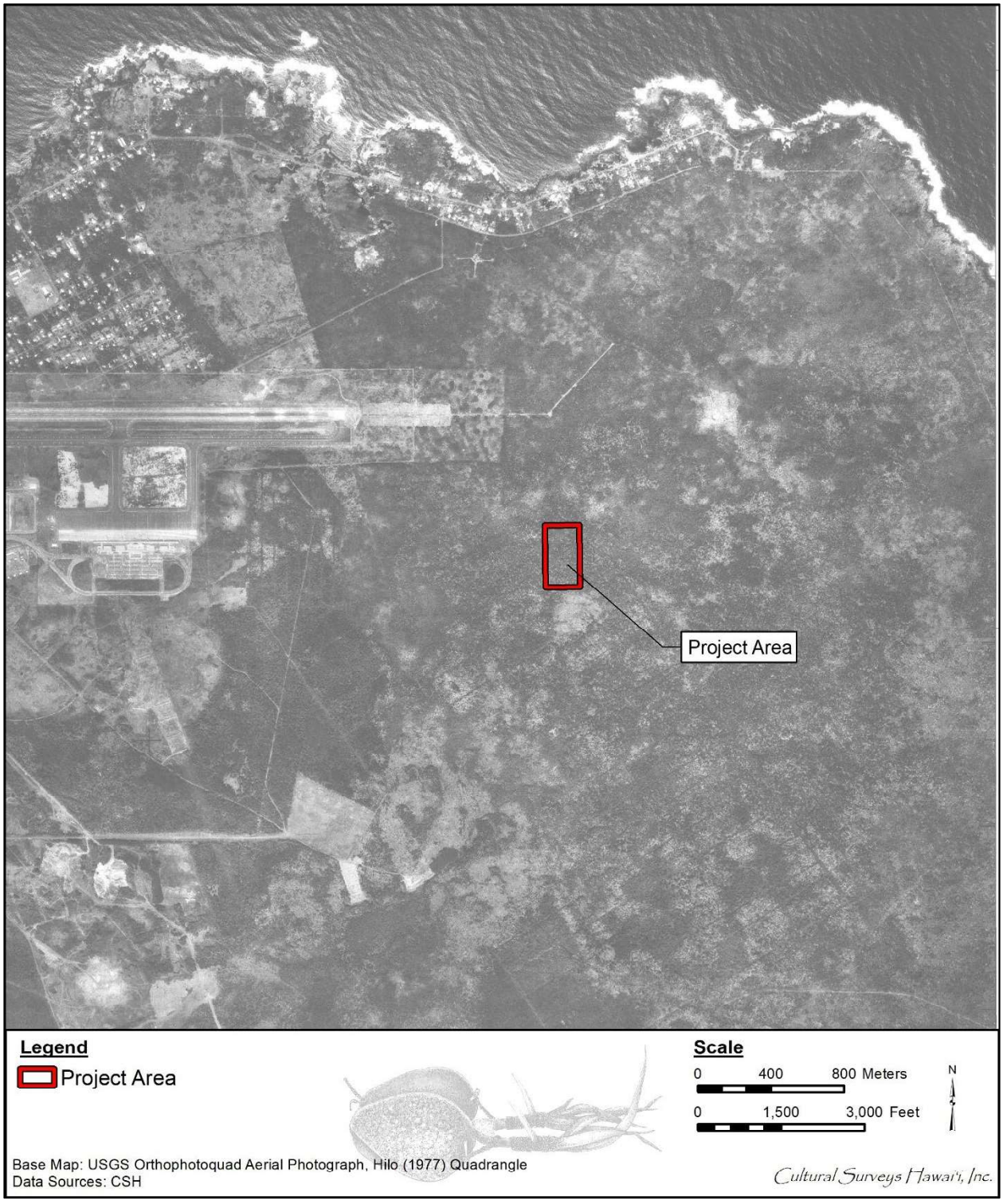

Figure 14. 1977 USGS Orthophoto showing continued development in the vicinity of the project area

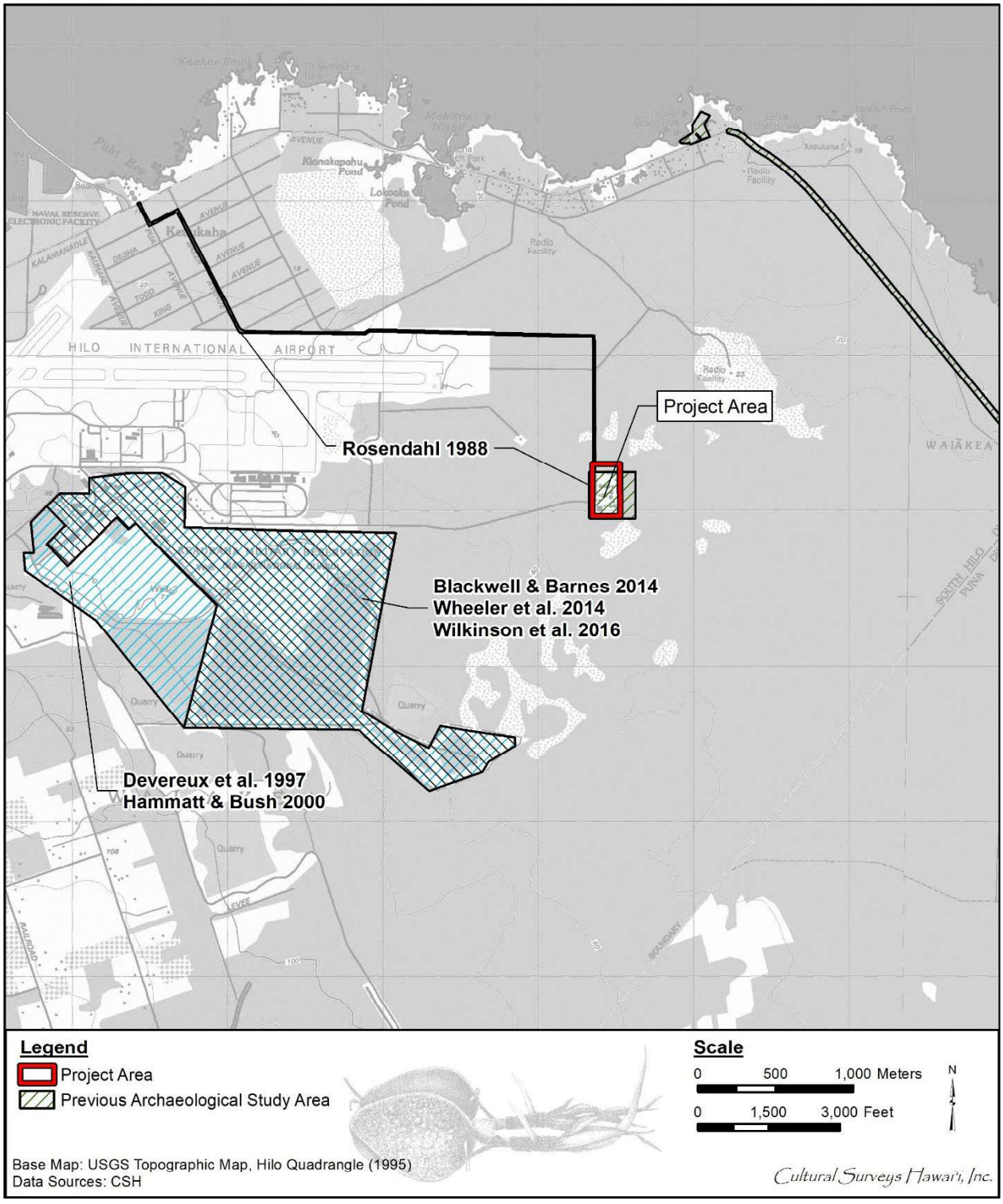

Figure 15. 1995 Hilo USGS topographic quadrangle showing the approximate locations of previous archaeological studies situated within 1.5 km of the project area; note previous studies located beyond this distance not shown

Table 1. Previous archaeological studies located within 1.5 km of the project area

Reference	Type of Study	Location	Results (SIHP # 50-10-35)
Rosendahl 1988	Archaeological reconnaissance survey	Hilo Wastewater Treatment Facility (included an associated sewer line corridor extending 3,810 m to old plant site at Puhi Bay), Waiākea, TMKs: (3) 2-1-013:012, 013, 020, and 022 por.	No historic properties identified
Devereux et al. 1997	Archaeological reconnaissance survey	503.6 acres at Hawaii Army National Guard Keaukaha Military Reservation, Waiākea, TMKs: (3) 2-1-012:003 and 2-1-013:010	Documented two sites, not assigned SIHP numbers, located over 1.5 km from current project area: CSH-1 (C-shape enclosure) and CSH-2 (coral mound); see Hammatt and Bush 2000 and Wheeler et al. 2014
Hammatt and Bush 2000	Archaeological inventory survey	503.6 acres at Hawaii Army National Guard Keaukaha Military Reservation, Waiākea, TMKs: (3) 2-1-012:003 and 2-1-013:010	Documented four historic properties, all located over 1.5 km from current project area: SIHP #s -18869 (Puna Trail), -21657 (military C-shape initially identified by Devereux et al. 1997), -21658 (five *ahu* or cairns), and -21659 (modified blister); deaccessioned coral mound documented by Devereux et al. 1997
Blackwell and Barnes 2014	Historic building survey and evaluation report	Six Hawaii Army National Guard Facilities Statewide, including Keaukaha Military Reservation, Waiākea, TMKs: (3) 2-1-012:003, 131, and 2-1-013:010	Documented ten buildings and four ranges, of which all but one are historic in age; all of the buildings and ranges recommended not eligible for listing on the National Register of Historic Places (NRHP); all buildings and ranges located over 1.5 km from current project area

Reference	Type of Study	Location	Results (SIHP # 50-10-35)
Wheeler et al. 2014	Phase I (surface) archaeological inventory survey and monitoring plan	Hawaii Army National Guard Keaukaha Military Reservation, Waiākea, TMKs: (3) 2-1-012:003, 131, and 2-1-013:010	Documented five previously identified historic properties (SIHP #s -18869, Puna Trail; -21657, military C-shaped enclosure; -21658, mound complex; -21771, complex; -23273, trail and agricultural complex); and six newly identified historic properties (SIHP #s -30008, lava tube shelter; -30009, modified outcrop complex; -30010, historic complex; -30011, historic complex; -30012, historic trail; and -30038, trail segment associated with Puna Trail); all sites located over 1.5 km from current project area
Wilkinson et al. 2016	Phase II (subsurface) archaeological inventory survey	Hawaii Army National Guard Keaukaha Military Reservation, Waiākea Ahupua‘a, TMKs: (3) 2-1-012:003 and 2-1-013:010	Documented three previously identified historic properties (SIHP #s -21771, -30008 and -30010) and two newly identified historic properties (SIHP #s -30216, historic terrace; and -30217, agricultural complex); all sites located over 1.5 km from current project area

Figure 16. Photo overlooking the Hilo WWTP from the parking lot at the fenced plant entrance; view to east

Figure 17. Photo overlooking the Hilo WWTP from the existing digester control building; view to northwest

Figure 18. Photo overlooking the northeastern portion of the Hilo WWTP, where Phase 2 improvements are planned; view to north

Figure 19. Photo overlooking existing basins in the northeastern corner of the Hilo WWTP, where a Phase 2 improvement is planned; view to northwest

Figure 20. Photo overlooking the northwest portion of the Hilo WWTP, where Phase 1 and Phase 2 improvements are planned; view to north

Figure 21. Photo overlooking the northwestern corner of the Hilo WWTP, where a Phase 2 improvement is planned at the tan-colored structure visible at center of photo; view to northwest

Figure 22. Photo overlooking the central-eastern portion of the Hilo WWTP, where several Phase 1, Phase 2, and Future improvements are planned; view to north

Figure 23. Photo overlooking the central-western portion of the Hilo WWTP, where several Phase 1 improvements are planned; view to southwest

Figure 24. Photo overlooking existing sedimentation tanks in the central-western portion of the Hilo WWTP, where Phase 1 improvements are planned; view to west

Figure 25. Photo overlooking the central-western portion of the Hilo WWTP, where Phase 1, Phase 2, and Future improvements are planned; view to west

Figure 26. Photo overlooking an existing facilities building near the plant entrance, where a Phase 2 improvement is planned; view to south

Figure 27. Photo overlooking the southwestern portion of the Hilo WWTP, where several Phase 1, Phase 2, and Future improvements are planned; view to east

Figure 28. Photo overlooking the southwest corner of the Hilo WWTP, where several Phase 1, Phase 2, and Future improvements are planned; view to west

Figure 29. Photo overlooking the open, graded perimeter area in the southwest corner of the property outside the plant security fence, where a future warehouse building is planned; view to south

Figure 30. Photo overlooking the open, graded perimeter area immediately south of the plant security fence, where a Phase 1 flare and Future cogeneration facility are planned; view to west

Figure 31. Photo overlooking the open, graded perimeter area immediately east of the plant security fence; view to south

Figure 32. Photo overlooking the open, graded perimeter area immediately north of the plant security fence, note area of dense invasive forest to right; view to west

Figure 33. Photo overlooking the gravel roadway and adjacent graded areas located along the northwestern boundary of the plant property; view to south

Figure 34. Photo showing extensive prior ground disturbance in the invasive forest at the northeastern corner of the plant property (survey marker with pink flagging visible at center); view to northeast

Figure 35. Photo showing graded and leveled terrain within the area of dense invasive forest north of the plant security fence; view to southwest

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Attachment E

Hilo WWTP Rehabilitation and Replacement Projects
Section 106 Consultation Contact List
CWSRF Project Numbers: C150062-53, C150062-54
CSH job Code: WAIAKEA 37

Name	Affiliation/Organization	Contact Info
SHPO Contact		
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Dr. Hussey, Sylvia Cc: Kamakana Ferreira (Lead Compliance Specialist), Lauren Morawski (Compliance Archaeologist), Shane Nelson (Community Outreach Advocate)	Chief Executive Officer, Office of Hawaiian Affairs	560 N. Nimitz Hwy. Suite 200 Honolulu, HI 96817 808-594-1835 kamakanaf@oha.org laurenm@oha.org shanen@oha.org
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