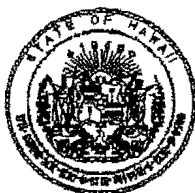


RE2 1049

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KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

July 19, 2004

Dr. J. Stephen Athens
IARI
2081 Young Street
Honolulu, HI 96826-2231

Log No. 2004.1976
Doc No. 0406PM14

Dear Dr. Athens:

SUBJECT: Chapter 6E-42 Historic Preservation Review of a Draft Report: "Habitation in the Dry Lands of Lower Honokohau: Archaeological Data Recovery and Related Mitigation Research for an Area in the Ahupua'a of Honokohau I and II, Kona District, Island of Hawai'i" (Tuggle 2004) Honokohai, North Kona, Hawaii Island
TMK: (3) 7-4-08:13 and 7-4-08:30

Thank you for the opportunity to review and comment on the above referenced report, received in our office May 12, 2004. The report, prepared for by Lanihau Properties, LLC, presents the results of data recovery investigations undertaken at 30 sites located in a portion of a roughly 803-acre project area where 284 sites were found in a 1992 archaeological inventory survey ("*An Archaeological Inventory Survey of an Approximately 803-acre Subject Parcel in the Ahupua'a of Honokohau I and II, North Kona District, Island of Hawai'i*"—Robins et al 2000).

Our review is late and we sincerely regret that our staff were unable to devote more time to the reading of this report, which represents the first serious attempt in some time to gain a better understanding of land use patterns in what is called by different archaeologists the "barren zone", the "intermediate zone" or the "middle zone" in the dry region of Kona and other dry areas on the island of Hawai'i. One objective of the research was to test the validity of two competing settlement pattern models for this zone, one based on the interpretations of site function presented in the inventory survey report and the second on a re-interpretation of the inventory survey data. A second goal was to provide a set of implications for the settlement history of the ahupua'a.

Exhibit 12

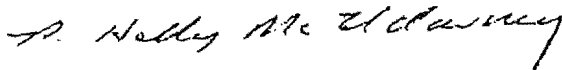
Dr. J. Stephen Athens

We believe that the research presented in this report made a good faith effort to address the goals outlined in the approved data recovery plan. The data obtained during the field investigations are nicely summarized in tables and accompanied by unusually thoughtful discussions of what they imply in terms of site function and duration of use. In our quick reading of the report we noted a few areas of disagreement (or differences of opinion) on the interpretation of some remains and other matters (see Attachment), which do not detract from the value of the report, however. Differences of opinion on matters of archaeological practice and interpretation are to be expected; as the author notes on page 135, "Hawaiian archaeology has its difficulties." Not the least of these difficulties is the general disinterest in developing new methodologies to gain a better understanding of the archaeological record. The author has begun a "conversation" on a number of important issues which we hope others will pursue in future studies of what should probably no longer be called, following a "group think" kind of mentality, the "barren zone."

The report has fulfilled the requirements for data recovery reports and thus meets with our approval. We will leave it up to you and the author to decide if you wish to respond to our few comments.

If you should have any questions about this project please contact our Assistant Hawaii Island archaeologist, MaryAnne Maigret, at 327-3690, or Archaeology Branch Chief, Sara Collins, at 692-8026.

Aloha,



P. Holly McEldowney, Administrator
State Historic Preservation Division

PM: sky

- c. Chris Yuen, County of Hawaii Planning Department
Kai Emler, County of Hawaii Department of Public Works