



EXHIBIT 9

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STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
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April 27, 2022

Michele Chouteau McLean, Director
County of Maui
Department of Planning
2200 High St.
Wailuku, HI 96793
c/o michele.mclean@co.maui.hi.us

IN REPLY REFER TO:
Project No. 2020PR33969
Doc. No. 2204IK01
Archaeology, Architecture

Dear Michele Chouteau McLean:

SUBJECT: **Chapter 6E-42 Historic Preservation Review -
County of Maui Permit Applications – CPA 2021/0001, CIZ 2021/0001,
PH1 2021/0001, and EA 2021/0002
Kō‘ele Project District Amendment and Draft Environmental Assessment
Literature Review and Field Inspection
Kamoku and Paoma‘i Ahupua‘a, Lāhainā District, Island of Moloka‘i
TMK: (2) 4-9-001:021, 024, 025 por., 027, 030; (2) 4-9-002:001 por. and 061 por.,
(2) 4-9-018:001, 002 por., 003 por., 004, 005; (2) 4-9-020:001 through 008, 010 through 019,
and 020 por.; and (2) 4-9-021:001 through 008, and 010**

This letter provides the State Historic Preservation Division’s (SHPD’s) review of the County of Maui Permit Applications CPA 2021/0001, CIZ 2021/0001, PH1 2021/0001, and EA 2021/0002 for the Kō‘ele Project District Amendment. SHPD received a County of Maui cover letter, a Pūlama Lāna‘i cover letter, an HRS 6E Submittal Form, a Draft Environmental Assessment (EA 2021/0002), and a draft archaeological literature review and field inspection (LRFI) report titled, *Archaeological Literature Review and Field Inspection for Kō‘ele Project District Amendment Kamoku and Paoma‘i Ahupua‘a, Lāhaina District, Lāna‘i Island, Archaeological Literature Review: TMKs: [2] 4-9-002:001 (portion) & :061 (portion), [2] 4-9-018:001, :002 (portion), :003 (portion), & :004, [2] 4-9-020:001-008, :010-019, & :020 (portion) and [2] 4-9-021:001-008, & :010, Field Inspection: (2) 4-9-002:001 (portion), & :061 (portion)* (DiVito et al., August 2020). SHPD received the submission on November 18, 2021 (Submission No 2020PR33969.002).

Pūlama Lāna‘i (landowner) proposes removing lands from the Project District designation and reclassifying them to other designations, adding lands to the Project District, and amending language within MCC Chapter 19.71. The proposed Project District comprises 564 acres and includes various parcels and tax map keys (TMK). The Kō‘ele Project District was initially established in 1986 via Ordinances 1580 and 1581 and amended in 1992 via Ordinances 2139 and 2140, which were approved by the Maui County Council. In addition, 14.5 acres of land containing the current stables and tennis courts are proposed to be zoned as “Resort Commercial” subdistrict designation along with additional lands in the area. The current submittal does not include a proposed project, and there are no proposed ground disturbances. Pūlama Lāna‘i indicates that future permits involving ground disturbance work within the Project District will require a separate HRS 6E review undertaken at that time and in conjunction with the future activity.

Honua Consulting produced the LRFI report (DiVito et al., August 2020) as an accompanying document for the proposed Project District Amendment. At the request of Pūlama Lāna‘i, the LRFI was conducted for two adjacent parcels proposed to be rezoned [TMK: (2) 4-9-002:061 por. (57.2 acres) and TMK: (2) 4-9-002:001 por. (9.5 acres)]

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and to provide an overview of documented historic properties within the current Kō‘ele Project District). The survey area totaled 66.7 acres. The field inspection included a 100% pedestrian survey with transects spaced 10 meters apart. The LRFI report includes an introduction, summaries of traditional and historical background information and previous archaeological studies, the results of a field survey, and conclusions. The LRFI report indicates that three previously identified historic properties are within the proposed Amended Project District. These are the Kō‘ele Historic District (SIHP #50-40-98-01004), a scatter of historic ranch-era artifacts associated with the Gay Lālākoa Homesteads (SIHP #50-40-98-01595), and traditional artifacts (SIHP #50-40-98-01596). The LRFI also documented four potential significant historic properties (SIHP #50-40-98-01988, 50-40-98-01989, 50-40-98-01004 Structure C, and 50-40-98-01004 Structure D) and three historic properties assessed to lack integrity or significance (Honua #2 [Historic Road remnant and drainage ditch], Honua #3 [Historic planter], and Honua #4 [Historic to Modern stockpile of imu rocks]). Additionally, four artifacts were collected from the surface, an ‘opihī shell, a basalt flake, and two pieces of volcanic glass.

Although the LRFI does not fulfill the requirements of an archaeological inventory survey as specified in HAR §13-276-5, it serves to facilitate project planning and supports the historic preservation review process. Please submit two hard copies of the LRFI report, clearly labeled FINAL, along with a text-searchable PDF copy of the report and a copy of this letter to the SHPD Kapolei office, Attn. Library. Also, submit a text-searchable PDF copy of the LRFI report to HICRIS Project 2020PR33969 using the Project Supplement option and a PDF copy of the report to lehua.k.soares@hawaii.gov.

Based on the information above, **SHPD has no objections** to the proposed Kō‘ele Project District Amendment (CPA 2021/0001, CIZ 2021/0001, PH1 2021/0001, and EA 2021/0002). The permit issuance process for the current permits may proceed.

SHPD requests to review future projects involving ground-disturbing activities within the Kō‘ele Project District Amendment. Additionally, **SHPD requests the County of Maui to flag** the following parcels within the Kō‘ele Project District Amendment, TMK: (2) 4-9-002:061 por. [57.2 acres] and TMK: (2) 4-9-002:001 por. [9.5 acres] indicating to consult with regarding the identified historic properties on Parcels 061 por. and 001 por. at the time a future project is proposed within these parcels.

Please contact Mary Kodama, Architectural Historian, at Mary.Kodama@hawaii.gov for any concerns regarding architectural resources, and ‘Iolani Kauhane, Historic Preservation Archaeologist III, at Iolani.Kauhane@hawaii.gov for any matters regarding archaeological resources or this letter.

Aloha,

Alan Downer

Alan S. Downer, PhD

Administrator, State Historic Preservation Division

Deputy State Historic Preservation Officer

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