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April 26, 1999

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OFFICE OF ENVIRONMENTAL
QUALITY CONTROL

Mr. Gary Gill, Director
Office of Environmental Quality Control
235 South Beretania St., #702
Honolulu, HI 96813

Subject: Finding of No Significant Impact for the Kamehameha Iki Park
Improvement Project, Lahaina, Maui, Hawai'i TMK (2) 4-6-2:010

Dear Mr. Gill: *Gary*

The Office of Economic Development has reviewed the comments received during the 30-day public comment period, which began on September 8, 1998. The agency has determined that this project will not have significant environmental effects and has issued a FONSI. Please publish this notice in the May 8, 1999 OEQC Environmental Notice.

We have enclosed four copies of the Final EA and have transmitted a completed OEQC Publication Form to your office via e-mail. Please call me or Mr. Rory Frampton of Chris Hart and Partners at 808-244-1955 if you have any questions. ✓

Sincerely yours,

Handwritten signature of Rosalyn H. Baker in cursive.

Rosalyn H. Baker
Economic Development Coordinator

xc: Christine Moschetti, Hui O Wa'a Kaulua
Colleen Suyama, Planning Dept., COM
Rory Frampton, Chris Hart and Partners

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MAY 8 1999

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FINAL
ENVIRONMENTAL ASSESSMENT

KAMEHAMEHA IKI PARK

LAHAINA, MAUI, HAWAII
TMK: 4-6-02: 10



April 1999

**FINAL
ENVIRONMENTAL ASSESSMENT**

KAMEHAMEHA IKI PARK

525 FRONT STREET
LAHAINA, MAUI, HAWAII
TMK: 4-6-02: 10



Prepared for:

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April 1999

PREFACE

This Final Environmental Assessment report has been prepared in support of applications for a Special Management Area Use Permit, Historic District Approval and a Shoreline Setback Variance for the redevelopment of the Kamehameha Iki Park. This assessment was prepared in accordance with the following rules and regulations:

- 1) Chapter 205A, Hawaii Revised Statutes, and Chapter 12-202, Special Management Area Rules and Regulations of the Maui Planning Commission.
- 2) Chapter 343, Hawaii Revised Statutes, Environmental Impact Statements and Chapter 11-200, Environmental Impact Statement Rules.

TABLE OF CONTENTS

SECTION	PAGE
I. OVERVIEW OF THE PROPOSED REQUEST	1
II. DESCRIPTION OF THE PROPERTY AND PROPOSED ACTION	3
A. PROPERTY LOCATION	3
B. PROPERTY DESCRIPTION	3
C. EXISTING LAND USE DESIGNATIONS	3
D. PROPOSED ACTION	3
III. ENVIRONMENTAL SETTING, IMPACTS, AND POTENTIAL MITIGATION MEASURES	6
A. PHYSICAL ENVIRONMENT	6
1. Surrounding Land Use	6
2. Climate	7
3. Topography and Soils	8
4. Flood and Tsunami Hazard	9
5. Flora and Fauna	9
6. Air Quality	10
7. Noise Characteristics	11
8. Visual Resources/Urban Design	11
9. Archaeological and Historical Resources	12
10. Shoreline Environment	15
B. SOCIO-ECONOMIC ENVIRONMENT	20
1. Population and Housing	20
2. Economy	20
C. PUBLIC SERVICES	21
1. Recreational Facilities	21
2. Police and Fire Protection	21
3. Solid Waste	22
4. Schools	22
D. INFRASTRUCTURE	23
1. Roadways	23
2. Wastewater	24
3. Water	25
4. Drainage	25
5. Electrical and Telephone Systems	27
IV. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS	28
A. HAWAII LAND USE LAW	28

B. GENERAL PLAN OF THE COUNTY OF MAUI	28
C. WEST MAUI COMMUNITY PLAN	29
D. MAUI COUNTY ZONING	32
E. SPECIAL MANAGEMENT AREA	32
1. Recreational Resources	32
2. Historical/Cultural Resources	34
3. Scenic and Open Space Resources	34
4. Coastal Ecosystems	35
5. Economic Uses	36
6. Coastal Hazards	36
7. Managing Development	37
8. Public Participation	38
9. Beach Protection	38
10. Marine Resources	39
F. ENVIRONMENTAL ASSESSMENT SIGNIFICANCE CRITERIA	40
G. SHORELINE SETBACK VARIANCE RULES	42
H. CULTURAL RESOURCES COMMISSION	44
V. FINDINGS AND CONCLUSIONS	48
VI. REFERENCES	49

EXHIBITS

- Figure No. 1a - Regional Location Map
- Figure No. 1b - Project Location Map
- Figure No. 2a - Existing Site Conditions
- Figure No. 2b - Site Photographs
- Figure No. 3 - Land Zoning Map
- Figure No. 4 - West Maui Community Plan
- Figure No. 5 - Concept Site Plan
- Figure No. 6a - 6f - Building Plans and Elevations
- Figure No. 7 - Flood Insurance Rate Map
- Figure No. 8 - Proposed Amendment to the Flood Insurance Rate Map
- Figure No. 9 - Aerial Photograph
- Figure No. 10 - Shoreline Survey Map
- Figure No. 11 - Composite Shoreline Survey Map

- APPENDIX A - Archaeological Inventory Survey
- APPENDIX B - Draft EA Comment letters and Responses

I. OVERVIEW OF THE PROPOSED REQUEST

District: Waine`e, Lahaina, Maui, Hawaii

Location: Lahaina, Maui, Hawaii

Address: 525 Front Street

Tax Map Key: (2) 4-6-02: 10

Land Area: 1.797 Acres

Landowner: State of Hawai`i
(Exec. Order 2771 to the County of Maui)

Applicant: Hui O Wa`a Kaulua
525 Front Street
Lahaina, Hawaii 96761

Planning Consultant/
Agent: Chris Hart & Partners
Landscape Architecture and Planning
1955 Main Street, Suite 200
Wailuku, Hawaii 96793

Land Use Designation

State Land Use District:	"Urban"
West Maui Community Plan:	"Park"
County Zoning:	"Lahaina Historic District No. 1"
Other:	"Special Management Area" and "Federal and State Historic Register"

Summary of Proposed Request:

The applicant, Hui O Wa`a Kaulua is seeking a Special Management Area Use Permit, Historic District Approval and Shoreline Setback Variance in order to implement renovations and improvements at Kamehameha Iki Park, located in the historic town of Lahaina, Maui, Hawaii. The subject property is approximately 1.797 acres and is designated "Park" by the West Maui Community Plan. The objective is to create a cultural park with the focus being the various aspects of Hawaiian canoe sailing. The renovated park will house a Hale Wa`a (canoe house) for the

Kamehameha Iki Park
Final Environmental Assessment

construction, presentation and storage of double-hulled Hawaiian sailing canoes. Other structures include a smaller Keiki Hale, an educational center and traditional shrines and structures aimed at restoring the honor and dignity to this previously significant cultural and historic site.

II. DESCRIPTION OF THE PROPERTY AND PROPOSED ACTION

A. PROPERTY LOCATION

The subject property is located at 525 Front Street, Waine'e, Lahaina, Island of Maui and is identified as Tax Map Key 4-6-02: 10. *See Figure No. 1a.* The subject property is bounded by Pacific Ocean on the west and Front Street and Malu'ulu 'O Lele Park on the east and is situated between 505 Front Street Shopping Center and the Pioneer Managers' Housing Lot and Holy Innocents Episcopal Church. *See Figure No. 1b.*

B. PROPERTY DESCRIPTION

The project site was formerly known as the Armory Park and has an approximate area of 1.797 acres. The site is currently used as a County park and contains two structures: an old quonset hut office and a large garage/workshop building. *See Figures 2a and 2b.* The structures are associated with the former use of the site as the Lahaina National Guard Armory. The quonset hut until recently was used by the Lightbringers as a food provider for the homeless. The garage structure is presently being used to house a double-hulled canoe under construction. The property is generally level with a slight slope from a high point along its eastern (mauka) boundary to the low points along the western (makai) ocean boundary.

C. EXISTING LAND USE DESIGNATIONS

- State Land Use District: "Urban"
- West Maui Community Plan: "Park" *Figure No. 4*
- Maui County Zoning: "Lahaina Historic District No. 1" *Figure No. 3*
- Other: "Special Management Area" and
"Federal and State Historic Register"

D. PROPOSED ACTION

The goal of Hui O Wa'a Kaulua is to promote, encourage participation and provide education and instruction in Hawaiian culture by focusing on double and single hulled sailing canoes. The group's specific objectives are centered around the construction and sailing of Hawaiian canoes. The goal of the

proposed project will be to construct improvements at Kamehameha Iki Park which will facilitate the achievement of these objectives.

The main building will be the Hale Wa`a which will be used for the construction and storage of double hulled sailing canoes. Other features will include a Keiki Hale, an Educational Center, Native Hawaiian and Polynesian landscape plantings and other traditional cultural structures such as fishing shrines and navigational structures. The following are the primary features included in the master plan for the park.

Site Plan. *See Figure 5.* A major objective of the site plan is to enhance the pedestrian experience along Front Street by reducing the presence of the automobile. Landscape plantings, walkways and the educational center will invite the pedestrian to enter the park. Vehicle parking will be relocated from the front of the property to the southern property line. The Keiki Hale and Hale Wa`a are located with direct access to the ocean for canoe launching purposes. An area has been set aside for a pond or water feature, which would be developed in conjunction with the planned renovation of Malu`ulu O Lele Park across the street. The idea is to provide a visual connection to strengthen the relationship of the two cultural parks.

Keiki Hale (Phase I) - Approximately 54 ft. long by 20 ft. wide. *See Figure 6a.* This structure will be built using traditional materials and design and will be used for canoe storage. The open air structure will also be used as a working and teaching area for youth programs centered around Hawaiian crafts, arts and demonstration. It will be the first structure built as part of the renovation plan and will be able to store the double hulled canoe Mo`olele while the Hale Wa`a is under construction. The structure will be located within the Shoreline Setback Area, and is the subject of the requested Shoreline Setback Variance.

Hale Wa`a (Phase II) - Approximately 100 feet long by 41 feet wide. *See Figures 6b through 6e.* This structure will be the major focal point for the Park. It will be used for the construction and storage of double hulled canoes. It will also contain a kitchen, restrooms, an office and a second story multi-purpose room for storage and meetings. The design will resemble traditional Hawaiian architecture. Natural materials will be used on the exterior surfaces.

Kamehameha Iki Park
Final Environmental Assessment

Education Center (Phase III) - Approximately 35 ft. long by 28 ft. wide. See *Figure 6f*. The design of this structure is based on Princess Nahienaena's home, which was located at the site of the current Kamehameha III Elementary School site around the year 1833. The structure will be used primarily for research and education needs and will include a visitor information center.

Landscape Plantings and other Site Features. Areas throughout the site will be used for growing Hawaiian or Polynesian medicinal plants. These areas will be designed as walkthrough gardens. Shade trees and hedges will be planted along the perimeter of the parking lot as required by County ordinance. Also included will be a performance stage, navigational platform, a fishing shrine and other culturally significant structures which will be used for educational and interpretive purposes.

III. ENVIRONMENTAL SETTING, IMPACTS, AND POTENTIAL MITIGATION MEASURES

A. PHYSICAL ENVIRONMENT

1. Surrounding Land Use

Existing Conditions:

The subject property is located on the west side of Maui in the historic Lahaina Town. Lahaina Town contains regional commercial services, major civic facilities and spaces, and residential neighborhoods. The town's significant features -- its historic character, compact small-town scale, and its vitality -- are embodied in the Front Street environs.

The subject site is located in the middle of Lahaina Town's Urban District, which extends from above Honoapiilani Highway to the ocean and from Puamana Park to just north of Mala. The Community Plan map presents an illustration of the range of uses planned within the Lahaina's Urban core. See *Figure 4*.

Specific uses surrounding the subject site include the following:

- North: Abutting the subject property's northern boundary is the old Pioneer Mill Managers' residential dwellings. Land use designations include:
 - State Land Use Commission: "Urban" District.
 - County Zoning: "Lahaina Historic District No. 1".
 - West Maui Community Plan: "Park" and "Public/Quasi-Public".

- South: Abutting the subject property's southern boundary is the 505 Front Street Shopping Center and the Lahaina Shores Condominium Complex. Land use designations include:
 - State Land Use Commission: "Urban" District.
 - County Zoning: "Lahaina Historic District No. 1".

Kamehameha Iki Park
Final Environmental Assessment

- West Maui Community Plan: "Business" and "Hotel".
- East: Across Front Street is Malu`ulu O Lele Park. Land use designations include:
 - State Land Use Commission: "Urban" District.
 - County Zoning: "Lahaina Historic District No. 1"
 - West Maui Community Plan: "Park".
- West: Abutting the subject property's southern boundary is the Pacific Ocean.

Potential Impacts and Mitigating Measures:

The subject property is located in an area characterized by an urban level of services and development and is the only beach-front park in the center of Lahaina Town. In recent years, the site has been underutilized as a recreational area and, at times, derelict. Redevelopment of the site will improve the ambiance of surrounding area and will provide a venue for cultural expression and education for residents and visitors. It will also establish a stronger relationship between the park and ocean related uses, thus, enhancing the park's identity.

It is also important to note the recent efforts to recognize the cultural and historic significance of the site and the surrounding area during the early part of the 19th century as the center of the Hawaiian Kingdom. It is the goal of the community to re-establish this site and the property across the street (Malu`ulu o Lele Park) as cultural parks in order to restore the dignity to this once sacred area.

2. Climate

Existing Conditions:

The climate in the Lahaina region is influenced by the persistent north-northeasterly trade winds. Lahaina Town is located in the dry leeward portion of West Maui. Average annual temperature in Lahaina is 75°F. Average monthly temperatures vary by about nine degrees between the

coolest and warmest months. Rainfall at the subject property averages approximately 15 inches per year.

3. Topography and Soils

Existing Conditions:

The subject property is mostly flat with a slight slope, which runs makai from Front Street to the ocean. Site topography has been modified to accommodate existing building structures and parking areas. There are no significant topographic constraints within the subject property.

The soil type specific to the subject property is Ewa silty clay loam, 0 to 3 percent slopes (EaA). EaA soils consist of well drained soils in basins and on alluvial fans. These soils developed in alluvium derived from basic igneous rock. Runoff is very slow and the erosion hazard is no more than slight.

Potential Impacts and Mitigating Measures:

Erosion and silt movement during construction should be minimal due to the following factors:

- a. The site's relatively flat topography.
- b. The minimal area of disturbance during construction. (Keiki Hale will involve minimal excavation for rock footings; Hale Wa`a will be built on the existing garage's concrete slab, and the Educational Center will be built on the site of the existing parking lot.)
- c. The phased or sequential nature of the construction plan which minimizes the amount of disturbed area at any one time.

The existing garage/workshop slab will be utilized as the foundation for the proposed Hale Wa`a, and therefore, the soil beneath this structure will not be exposed. In the event that portions of the slab are removed, sub-surface soils will be dealt with according to regulations established by the State Department of Health.

4. Flood and Tsunami Hazard

Existing Conditions:

The subject property was previously designated Zone "A4" by the Flood Insurance Rate Map No. 150003 163 B for this region. Zone "A4" defines an area of 100 year flood and base flood elevation for the subject property has been determined to be eight (8) feet above mean sea level (MSL). See Figure No. 7.

This map has been revised by the Federal Emergency Management Agency due to the recent drainage improvements associated with the Front Street Improvement project. The revised map shows the subject property primarily in Zone "B" with the makai portions of the parcel as Zone "V12" and "A12" and mauka portions along Front Street also with a designation of "A12." Zone "B" defines an area between limits of the 100-year flood and 500-year flood; or certain areas subject to 100-year flooding with average depths less than one (1) foot. Zone "V12" defines an area of coastal flooding with velocity (wave action) with base flood elevations in this area determined to be seven (7) feet above MSL. Zone "A12" defines an area of potential flooding with base flood elevations in this area determined to be six feet above MSL. See Figure No. 8.

Potential Impacts and Mitigation Measures:

The average elevation of the park is approximately seven feet above MSL and, thus, the majority of the park site is above established base flood elevations. Any proposed structures will be built in accordance with the Flood Insurance Rate Programs established guidelines. As such, the proposed project should have no adverse impact upon the subject property or its neighbors with regards to flood hazard potential. (See Section III.D.4. Drainage for a discussion of stormwater runoff.)

5. Flora and Fauna

Existing Conditions:

The subject property is substantially improved. Landscape improvements on the property include mature shade trees such as monkey pod, palms,

plumeria, hau and various grasses. There are no rare, endangered or threatened species of plant at the site.

Animal life in the project vicinity similarly reflects the urban character of the region. Avifauna typically found Lahaina Town includes the common myna, several species of dove, cardinal, house finch, and house sparrow. Mammals common to this area include cats, dogs, rodents, and mongoose.

Potential Impact and Mitigating Measures:

There are no known significant habitats of rare, endangered, or threatened species of flora and fauna located on the subject property. Therefore, the proposed project will have no adverse impact upon the flora and fauna on the subject property and in the surrounding area.

6. Air Quality

Existing Conditions:

Air quality in the Lahaina region is considered relatively good. Point sources (e.g., Pioneer Sugar Mill) and non-point sources (e.g., automobile) of emissions are not significant to generate high concentration of pollutants. The relatively high quality of air can also be attributed to the region's constant exposure to wind, which quickly disperses concentrations of emissions. This rapid dispersion is evident during the burning of sugarcane in the fields of West Maui. Maui is currently in attainment for all criteria pollutants established by the Clean Air Act, as well as the State of Hawai'i Air Quality Standards. This means that the ambient air in Maui is in compliance with the State and Federal air quality standards (DOH pers. com.).

Potential Impacts and Mitigating Measures:

Air quality impacts attributed to the proposed project could include dust generated by the short-term, construction-related activities. Site work such as grading and building construction, for example, could generate airborne particulate. Dust control measures such as regular watering and sprinkling will be implemented to minimize the potential impact from wind-blown emissions.

In the long term, the increase in the number of visitors and residents could result in a slight increase in the volume of traffic in the project's vicinity, which in turn could affect the air quality. However, this increase is not considered significant when compared to existing park usage and the overall amount of vehicles in this area. As such, the proposed project is not anticipated to be detrimental to the local air quality.

7. Noise Characteristics

Existing Conditions:

Traffic noise from Front Street is the predominant source of background noise in the vicinity of the subject property. The sports field and parking lot, across Front Street, and the abutting shopping center are also sources of noise in this locale.

Potential Impacts and Mitigating Measures:

In the short term, the proposed project will have minimal adverse impact upon ambient noise levels. This is due to the use of traditional Hawaiian materials and techniques and the phasing of the various construction projects over time. The majority of the phases are relatively minor construction projects and there will be no significant excavation or earth moving activities. To minimize construction related impacts to the surrounding property owners, the applicant proposes to limit construction activities to normal daylight working hours, and adhere to the State Department of Health's noise regulations for construction equipment.

In the long term, the proposed project should not have any adverse impacts upon the existing noise conditions in this area of Lahaina.

8. Visual Resources/Urban Design

Existing Conditions:

Public views of the ocean from Front Street exist along the northern portion of the project site. The majority of the southern portion of the property contains structures which restrict ocean views from Front Street.

Potential Impacts and Mitigating Measures:

The proposed structures have been located in the same area as the existing buildings and will not represent a significant increase in visual obstructions of view corridors towards the ocean from Front Street. The project is anticipated to have a positive impact on the urban design character of the immediate area by utilizing traditional architectural materials and styles, increasing landscape plantings and reducing the impact of the automobile along Front Street.

As such, the proposed project is not anticipated to significantly impact public view corridors and will not have an adverse impact upon the visual character of the site and its immediate environs.

9. Archaeological and Historical Resources

Existing Conditions:

Lahaina Town is registered in the National and State Registers of Historic Places. Portions along the Front Street corridor, including the subject property, are designated by the County as Maui County Historic Districts No. 1 and No. 2.

Lahaina was a significant place in the Hawaiian Kingdom, serving as its capital during the first half of the nineteenth century. The subject property was the Palace site of Kamehameha III, the building was referred to as Hale Piula. The project site is located across from the present Malu'ulu 'O Lele Park, formerly the site of Moku'ula and Loko o Mokuhinia. The boundary of the Palace Complex is listed on the National Register of Historic Places as including Tax Map Keys 4-6-02: 10 (the subject property) and 4-6-07, Parcels 1; 2; 35; and 36. The current Kamehameha III School was the site of royal residences, including that of Nahienaena.

While most of the surface remains associated with these and other important sites have been destroyed, there exists the possibility of subsurface remains in the areas, which have been previously undisturbed. In a 1993 study by Dr. Paul Klieger of the Bishop Museum on the various aspects of the island of Moku'ula and the Loko Mokuhinia, it was noted that further analysis of soils and sediments found in future excavations in the nearby vicinity could

provide clues to the origin of Loko Mokuhinia and thus its possible cultural function.

Xamanek Researches performed an Archaeological Inventory Survey of the property in 1988, which is included in this Environmental Assessment as Appendix A. The report was prepared for the Department of Parks and Recreation in conjunction with plans for renovation at the park (the anticipated project was never initiated.)

The Xamanek report notes that royal concern with the subject parcel began in 1840, when King Kamehameha III initiated construction of his palace, Halepiula (House with the Iron Roof). Historical accounts of the building indicate that it was quite large, approximately 120 feet long by 40 feet in width. The building apparently was never finished, and the Xamanek report documents a number of historical accounts which were quite critical of the structure's appearance and design.

The following are further excerpts from the Xamanek report regarding Hale Piula and the history of the subject property in the 20th century:

"By 1848, it was being used as a court house, until it was so badly damaged by Kauaula winds in 1858, that the remaining stones and coral blocks were incorporated into the Lahaina Court House, which was under construction, and still stands in Lahaina overlooking the small boat harbor. It might be noted, that the same wind destroyed 20 other substantial buildings."

"After 1858, the parcel under study seems to fade in importance. There is the suggestion that no major public buildings succeeded the palace until 1912, when President William Howard Taft, helped to proved a Congressional Grant of \$10,000.00 for construction of a military armory (Maui News, June 28, 1941). The building was substantial (Photo 13), and although no specific dimensions were located in the archives at Fort Ruger, it appears to have been about 120 feet by 60 feet (Map 7)."

"Following its completion in 1914, it served as the "home" of Company A, 299th Infantry, U.S. Army. After World War II, it served the Hawaiian

National Guard. On January 15, 1951, a windstorm caused major damaged to the building."

"Repair work and rebuilding led to the "new" Armory which was completed by December 13, 1951. It was a "temporary" facility consisting of two quonset huts, one of 40 by 100 feet and a second of about 20 by 60 feet. A large concrete slab with an elevated "lean-to" (for vehicle storage) was also included in the renewed Armory (personal research, Fort Ruger Archives)."

"Between 1953 and 1959, the Armory building was used by the Certificates of Hawaiian Births staff for registration purposes. The Hawaii National Guard continued to utilized the grounds and buildings as well, until May 15, 1973, when Sunao Kido (Chairman, Department of Land and Natural Resources) approved that the Lahaina Armory site be withdrawn from the Executive Orders setting it aside for the Hawaii National Guard, and that the site be set aside for County of Maui use for expansion of recreational facilities."

The exploratory excavations by Xamanek did not reveal any structural features which can definitely be determined to be associated with Hale Piula. Two oblong structures were uncovered in Test Trench 5 Series located in front of the existing slab, near the site of the proposed Keiki Hale. The structures were not fully understood at the time of the excavation.

A portion of the foundation of the other significant historical structure located on this parcel, the old Armory building, was located. At the makai side of the site, however, more recent construction activity has probably destroyed the rest of the foundation.

The paucity of artifacts was somewhat puzzling to Xamanek Researches, considering the amount of activity that has taken place on the site.

Potential Impacts and Mitigating Measures:

The majority of the proposed project will be built on previously disturbed portions of the property. Hale Wa`a will be built utilizing the existing garage's concrete slab. The Education Center will be built on the site of the existing parking lot. The Keiki Hale will be constructed in an area without

any existing surface features. A significant amount of test excavations were conducted in the vicinity of the proposed Keiki Hale by Xamanek Researches.

The Xamanek report concluded that if "the existing concrete slabs and asphalt are removed, a large section of the parcel will be opened up for archaeological exploration, and portions of the foundations may be uncovered. Since the historical maps which indicate the location of Hale Piula are far from precise (because they lack identifiable landmarks), the exact positioning of the building on the parcel was not known prior to the archaeological inventory excavations. It is hoped that if Hale Piula is located under the concrete slabs, the foundation has not been obliterated, so that its exact location can be established."

"Because over half of the area of the survey parcel is under pavement or asphalt, and unavailable for exploration, it is recommended that during the process of removal of these paved areas, archaeological monitoring be carried out. In order to effect this removal, the site will be considerably disturbed to depths of 40 cm. or more. Undisturbed features found during the inventory excavations occurred at depths of about 30 cm. and extended to 70 cm. b.s. Therefore, if there are as yet undisturbed features under the pavements, there is high likelihood that they can be discovered during the monitoring process. At that time further archaeological tests excavations may be warranted in order to complete the survey and data recovery."

In concurrence with the Archaeological Inventory Report prepared by Xamanek Researches, the applicant proposes Archaeological Monitoring during the demolition of the paved parking areas and portions of the concrete slabs (i.e. those not being utilized for Hale Wa'a.) Archaeological monitoring will also be conducted during any other activity which results in subsurface disturbance.

10. Shoreline Environment

In July 1994 a study was prepared by Sea Engineering, Inc. and AECOS, Inc. entitled "Coastal Engineering and Marine Environment Investigations for Drainline "F" Improvements, Lahaina, Maui". The study evaluated the

potential impacts of the installation of Drainline "F", which is located approximately 300 feet to the north of Kamehameha Iki Park between Kamehameha III Elementary School and the Episcopal Church. Much of the information gathered in this study is applicable to the shoreline and nearshore environment in front of the project site. The study evaluated the general oceanographic conditions at the site through a review of previous literature, analysis of historical aerial photographs, a surface drogue study, a bathymetric survey and observation of the existing conditions of the nearshore zone. The following information is taken from the Sea Engineering/AECOS study.

A series of fringing reef segments occurs along the coastline of West Maui between Honokowai Point (Ka'anapali) and Hekili Point (Olowalu). These reefs tend to occur off the broad points of land that project into the 'Au'au Channel. The reefs are characterized by shallow flats extending one to several hundred meters off the shoreline and an outer reef margin that may expose on low tides. Between these reefs the bottom tends to drop away gradually but steadily from shore. Live coral growth is mostly found on the front part of the reef, called the frontal slope. The "between reef" segments may also harbor considerable coral growth, and this may occur where the bottom rises above the general trend of the submarine slope. However, these areas are not reefs in the strict sense, because the outer margin is well below mean sea level and a shallow reef flat is not present.

A fringing reef wraps around Pu'unoa Point from Mala Wharf to the middle of Lahaina Town, and another extends from the vicinity of the harbor south to Makila Point (the mouth of Kau'ula Stream). The small "between reef" segment bounded by these two fringing reefs forms the old landing at Lahaina, and is the location of the present-day Lahaina Small Boat Harbor (the harbor was also built onto the fringing reef on the south side).

The marine environment off Kamehameha Iki Park is a shallow reef flat extending seaward to a shoaling reef margin about 500 feet off Lahaina Beach. Much of the reef flat is under one meter deep, has a bottom type of mixed sand and rubble, and supports mostly a moderately dense growth of algae

dominated by *Lyngbya* and *Acanthophora*. Fishes are sparse because of a lack of suitable cover. The seaward margin of the reef is a shoaling mound of coral rubble deposited by waves.

This marine biotype is classified as a coral moat environment, a reef community developed in shallow protected waters. The shallow reef margin supports an extensive deposit of loose rubble which provides protection to the moat from the abrasive action of waves, but enhances the exchange of water as waves break across the mound.

This section of coastline is protected from waves and wind from the northwest to the northeast, however, it is exposed to southern winds and waves from Kona storms, hurricanes, and southern swell. Regional coastal currents are predominantly driven by the tides. The currents parallel the coast and reverse with ebb and flood conditions. Currents tend to be northerly with ebb tides and southerly with flood tides, although current reversals do not always occur, and the northerly flow appears to be dominant.

It is likely that currents in front of Drainline "F" are strongly influenced by the fringing reef configurations and transport of water across the reef due to breaking waves. The shallow fringing reef in front of Drainline "F" extends to the south for over 2000 feet without a break, while a gap exists just to the north in front of Lahaina Harbor breakwater. It is therefore considered unlikely for currents inside the reef at the site to ever flow to the south.

Figure 9 is an aerial photograph taken on March 28, 1998 during a period of unusually high westerly swell. The photograph illustrates the buffering action created by the offshore reef. The beach directly in front of Kamehameha Iki Park appears wide while the beach in front of the Drainline "F" outlet is narrow to nonexistent. In 1994, Sea Engineering noted that the rounded shape of the northern part of the beach indicates that it could be slowly building to the north.

The beach along this shoreline appears to be variable in width from place to place and time to time especially to Drainline "F". A review of several aerial

photographs during the Sea Engineering/AECOS study showed the following past conditions. In May 1954, a beach approximately 50 feet in width was present between the harbor breakwater and the Drainline "F" outlet, but no beach was present off the seawall extending south of the outlet—the sand shore beginning in the vicinity of the County beach park (project site) and extending south to a small point 1800 feet north of Makila Point (around which the beach is comprised of cobble). The beach near the harbor and off Drainline "F" was about 50 feet wide in December 1978, December 1982, November 1981, and August 1988, and appeared to be continuous southward (as far as the photographs on hand revealed) on all of these dates except August 1988. On this date, very little sand shore was present south of the beach park. In June 1994, only a very narrow beach (10 to 15 feet wide) was present between the breakwater and Drainline "F" and no beach was present south of Drainline "F" for some 100 feet or more towards the beach park. The existing 1999 conditions are similar to the June 1994 observation as well as the March 1998 aerial photo, with little to no beach present in front of the seawalls abutting Drainline "F", with the beach starting in front of the park.

These examinations of aerial photographs show that historically the beach is typically on the order of 30 to 50 feet in width in front of Drainline "F". Sea Engineering observed wave reflection and severe water agitation in front of the seawalls, and they noted a temptation to blame the seawalls for the eroded state of the beach. However, the sea walls can be seen in photographs as far back as 1954, and while they probably slow the beach building process, it is apparent that there are beach erosion and accretion cycles that are independent of their presence.

A shoreline survey at the project site was conducted in November 1998 and was certified by the State in January 1999. This shoreline certification map is included herewith as Figure 10. A composite map has been prepared indicating the position of the certified shorelines in 1975, 1985, and 1998 (see Figure 11).

The composite diagram with shoreline positions illustrates shoreline fluctuation over the last 24 years. Between 1975 and 1985 the certified

shoreline position moved approximately 15 feet seaward (west). The 1998 shoreline varies, but on average is approximately mid-way between the 1975 and 1985 positions. It should be noted that these variations in position could be due to differences in surveying practices or standards over time or the highly variable nature of the vegetation at this site. Grass along this section of the shoreline is heavily influenced by irrigation practices and/or weather patterns (e.g., droughts).

In summary, the Sea Engineering/AECOS study indicated that the beach width fronting Drainline "F" has been dynamic over time, with a reduction in beach width noted in 1994 as well as at present. While the beach fronting the seawalls to the north have been quite variable, the 1994 review noted the presence of a sandy beach in front of the beach park in every photograph which was examined. This study did not suggest a trend of shoreline retreat or beach width reduction fronting the park since 1954. Historic accounts indicate that there have been numerous structures on this property since the 1840s. While a couple of these structures have been damaged by wind storms, there appeared to be no significant structural damage due to shoreline erosion.

Thus, based on historical photo analysis, historical uses and recent shoreline surveys, it appears that there is low risk of severe erosion retreat occurring at the site. The project site is not armored, in contrast to the properties immediately to the north. The project site does not appear to have been negatively affected by the seawalls to the north, this could be due to the predominately northern currents along this section of coastline. However, the applicant acknowledges the imprecise nature of predicting shoreline erosion/accretion rates and as such has taken a position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka (east).

Based on the review of the above data, it does not appear as though the proposed Keiki Hale will be subject to negative impacts associated with shoreline retreat.

B. SOCIO-ECONOMIC ENVIRONMENT

1. Population and Housing

Existing Conditions:

The population of the County of Maui has exhibited relatively strong growth over the past decade with a 1996 population of 117,013, a 16.6% increase over 1990 population of 100,374 (US Bureau of the Census, 3/20/97). The 1990 population of Maui Island was 91,361. The 1990 population of West Maui District was 14,574, which is 15.95% of Maui Island's population. West Maui's de facto population for 1990 was 34,974 (Community Resources, Inc., March 1994).

Potential Impacts and Mitigating Measures:

The proposed project should not have a significant impact upon local population levels.

2. Economy

Existing Conditions:

The Lahaina economy is based primarily upon the visitor industry. Visitor accommodations are located near the shoreline along with necessary support facilities and residential communities. Kapalua and Kaanapali have developed into important visitor destination anchors while the old Lahaina Town, with its historic character and charm, has developed into the region's visitor, service, commercial and residential center. Agriculture is also an important part of Lahaina's economy. Sugarcane and pineapple fields are found in the Lahaina district, and the historic Pioneer Mill on Lahainaluna Road continues to process cane.

Potential Impacts and Mitigating Measures:

On a short-term or long-term basis, the project will have little or no impact upon employment opportunities.

C. PUBLIC SERVICES

1. Recreational Facilities

Existing Conditions:

West Maui has a wide reputation as a recreational destination, particularly for ocean related activities. Ocean sports and recreation available in the West Maui District include swimming, fishing, surfing, scuba diving, snorkeling, sailing, and para-sailing. State and County beach parks in the West Maui District include the Honolua-Mokuleia Marine Life Conservation District, the D.T. Fleming Park, Pahoku Beach park, Honokowai Beach Park, Wahikuli State Wayside, Malu`ulu O Lele Park (non-ocean), Puamana Beach Park, Lanuniupoko St. Wayside, Ukumehame Beach Park, and Papalaua State Wayside. The subject parcel is an ocean-front park. It was previously known as "Lahaina Armory Park", and has been renamed "Kamehameha Iki Park".

Potential Impacts and Mitigating Measures:

Kamehameha Iki Park will be developed and maintained as a Hawaiian cultural park. The park experience, a unique blend of cultural and science, will invite both local and visiting people to a hands on experience of Hawai'i. The park ambiance will be improved by increasing the relationship to ocean related uses as well as through the utilization of traditional Hawaiian architecture and landscape plantings.

Therefore, the approval of the proposed request will provide benefits to the recreational resource base of West Maui.

2. Police and Fire Protection

Existing Conditions:

The Lahaina District Station of the Maui County Police Department has provided police protection for Lahaina District since 1974. The station is located behind the Lahaina Civic Center in Wahikuli. Police protection in the Front Street improvement area is supplemented by the Front Street "Koban" (substation) which is the base for Lahaina's three police bicycle patrol officers.

Fire protection in the Lahaina District is provided by the Maui County Fire Department's Lahaina Station. The Lahaina Fire Station, built in 1972, is staffed by 30 firefighters. There are three shifts with ten men on each shift. The station has two fire trucks.

Potential Impacts and Mitigating Measures:

The revitalization of the site will be a positive impact on this public area, which has been recently underutilized and, at times, derelict. The proposed project is not anticipated to have an adverse impact upon existing police and fire protection services.

3. Solid Waste

Existing Conditions:

Only two landfills are currently operating on Maui, the Central Maui Landfill in Pu'unene, and the Hana landfill. Single-family residential solid waste collection is provided by the County and taken to the Central Maui Landfill, which also accepts waste from private refuse collection companies. A convenience station is located in Olowalu to service West Maui residents. Solid wastes are transported from this convenience station to the Central Maui Landfill.

Potential Impacts and Mitigating Measures:

Solid waste collection for Kamehameha Iki Park would be provided by the County of Maui as part of the normal operation of park facility refuse collection.

4. Schools

Existing Conditions:

The West Maui District is serviced by both private and public schools, which provide education for preschool through high school age children. Public schools in the West Maui District include the King Kamehameha III Elementary School for children from kindergarten through fifth grade, the Lahaina Intermediate School for grades six through eight, and Lahainaluna High School for grades nine through twelve. Private schools in the West

Maui District include Sacred Hearts School for grades kindergarten through twelve, and several preschools.

Potential Impacts and Mitigating Measures:

As noted earlier, it is anticipated that the proposed project will not result in a significant increase in population levels. Therefore, the proposed project is not anticipated to significantly affect school enrollment.

The proposed project will include educational programs related to the indigenous sciences of navigation, sailing philosophy, seamanship and human behavior. The Hui will focus on the youth of the community through programs with the Department of Education, the County of Maui and private organizations to teach skills, ethics, and values, which will benefit all of Maui and Hawai'i. Outreach programs will encompass students from the mainland and other nations. Therefore, implementation of the proposed project will have a positive impact for Maui's youth by increasing the range of educational programs.

D. INFRASTRUCTURE

1. Roadways

Existing Conditions:

As in Maui, the automobile is the primary source of transportation in Lahaina. An extensive roadway system exists in the Lahaina area. Right-of-ways widths vary with each roadway. Some roads are paved with curbing and sidewalks while others are comprised of asphaltic concrete pavement with limited curbs.

The property has two access driveways along Front Street, which are 64 feet apart. The average right-of-way width along Front Street fronting the property is approximately 33 feet, and the pavement width is approximately 30 feet.

There are approximately 28 existing on-site parking spaces within the subject property. Additional parking is located east of the subject property in the Public Parking Lot for the Malu`ulu `O Lele Park and 505 Front Street Shopping Center.

Potential Impacts and Mitigating Measures:

Access will continue to be off Front Street, however, the driveway location will be moved in a southerly direction. Approximately 28 parking stalls will be provided on-site. A substantial portion of the resident and visitors traffic to the property will be pedestrian from the Front Street commercial core. Due to the increased exposure of the site, there could be a slight increase in traffic, however, the potential increase is considered insignificant given the existing traffic levels in the area. Therefore, the proposed request will not have any significant impact upon traffic operations on the adjacent streets.

2. Wastewater

Existing Conditions:

The surrounding region is serviced by a 24-inch County gravity sewer line located along Lower Honoapiilani Road. The 24-inch sewer line discharges into the existing County Sewage Pump Station No. 8, which is located within the project site. Sewage from the pump station is transported to the Lahaina Wastewater Reclamation Plant located about 6 1/2 miles away.

Currently onsite, there are restrooms, showers with hot and cold water, and a certified kitchen which were used previously by the Lightbringers facility.

Potential Impacts and Mitigating Measures:

The estimated increase in wastewater flow generated by the proposed project will be insignificant compared to the previous levels associated with the Lightbringers facility. Therefore, the proposed project will not have a significant impact upon the existing wastewater system that services the subject property.

3. Water

Existing Conditions:

Lahaina Town's water sources are the Kahana Stream and a water well near Lahainaluna School. This system is reinforced by the Alaeloa Source with a 16-inch transmission line along Lower Honoapiilani Road and Honoapiilani to Lahaina Town.

The subject property is serviced by a 1 1/2-inch water meter. This meter receives water from a 12-inch waterline located along Front Street. As discussed above, there are restrooms, showers with hot and cold water and a certified kitchen on the subject property. In addition, there are numerous exterior hose faucets and a manually operated landscape irrigation system.

Fire protection for the subject property is provided by existing fire hydrants fronting the subject property along Front Street.

Potential Impacts and Mitigating Measures:

There may be a slight increase in irrigation usage for the project site. The landscaping will utilize endemic and Polynesian introduced plants, which are adapted to the Lahaina area. Domestic consumption levels are not anticipated to increase significantly over previous levels. The proposed site will not have a significant impact upon the existing water system that services the subject property.

4. Drainage

Existing Conditions:

Lahaina Town is located within three major drainage basins. The potential for major flooding of low areas has been partially diminished due to interceptor ditches constructed by Pioneer Mill Company within the sugar cane fields mauka of the town. While these ditches divert runoff and thereby reduce some flooding in Lahaina Town, there is a critical need a permanent drainage diversion structure which is appropriately engineered, designed and constructed. Only after completion of such a structure will potential flooding problems from lands mauka of Lahaina Town be alleviated. Rainfall

within Lahaina Town does cause flooding within low lying areas and streets. Major flooding could occur due to a long duration storm.

The majority of drainage systems within Lahaina Town were implemented due to various recent developments within the area. These include the Baker Street drainage (36" pipe), the Papalaua Street drainage (24" and 30" pipes), Dickenson Street drainage (24" and 30" pipes), Prison Street drainage (24" pipe), and Malu`ulu o Lele Park drainage (referred to as Drainline "F", a system of open channels and pipelines). There are also a number of older systems built over 40 years ago. The existing drainage systems discharge into the ocean.

Across the front of the subject property, there is a 24-inch drainage line that runs along Front Street, connects with Drainline "F" and discharges into the ocean. Presently, stormwater runoff generated within the subject property either sheetflows onto Front Street or into the landscaped areas and into the Pacific Ocean. The Front Street runoff flows into the existing drainage collection system and discharges into the ocean.

As part of the completed Front Street Improvement Project, the County of Maui has installed a comprehensive drainage collection system in the Front Street corridor. These facilities have been designed taking into account full buildout of the Lahaina Town area.

Potential Impacts and Mitigating Measures:

The proposed project will result in little if any net increase in impervious surfaces. Runoff from development of the new parking area will be directed to the recently improved drainage facilities along Front Street. Therefore, the proposed project will not have a significant impact upon Lahaina Town's existing drainage system or upon adjacent properties.

5. Electrical and Telephone Systems

Existing Conditions:

Electrical service to the subject property is presently provided by Maui Electric Company, Ltd. (MECO) powerlines. Any additional electrical power needs for the subject property will be supplied by MECO.

GTE Hawaiian Telephone Company maintains overhead telephone lines that serve the subject property.

Potential Impacts and Mitigating Measures:

The proposed project will not have any adverse impact upon the existing electrical or telephone systems that service the subject property.

IV. RELATIONSHIP TO GOVERNMENTAL PLANS, POLICIES, AND CONTROLS

A. HAWAII LAND USE LAW

Chapter 205, Hawaii Revised Statutes, relating to the Land Use Commission, establishes the four major land use districts in which all lands in the State are placed. These districts are designated "Urban", "Rural", "Agricultural", and "Conservation". The subject property is within the "Urban" District. The proposed improvements are permitted within the "Urban" District.

B. GENERAL PLAN OF THE COUNTY OF MAUI

The General Plan of the County of Maui (1991 updated) provides long term goals, objectives, and policies directed toward the betterment of living conditions in the County. Addressed are social, environmental, and economic issues that influence future growth in Maui County. The proposed project is consistent with the following General Plan objective and policies:

Objectives: To preserve for present and future generations the opportunity to know and experience the arts, culture and history of Maui County.

Policies:

- Encourage the recordation and preservation of all cultural and historical resources.
- Establish programs to restore, maintain and interpret significant cultural sites and artifacts in both natural and museum settings.
- Encourage the rehabilitation and adaptive use and reuse of historic buildings and sites in order to perpetuate traditional community character and values.

Objectives: To provide a wide range of recreational programs and cultural opportunities to all of our people.

Policies:

- Encourage the identification, restoration, and preservation of important archaeological, historical and cultural sites.
- Encourage the use of public lands to expand and enhance outdoor recreational and cultural opportunities.

C. WEST MAUI COMMUNITY PLAN

Nine (9) community plan regions have been established in Maui County. Each region's growth and development is guided by a Community Plan, which contain objectives and policies in accordance with the County General Plan. The purpose of the Community Plan is to outline a relatively detailed agenda for carrying out these objectives.

The subject property is located within the West Maui Community Plan. The West Maui Community Plan was recently updated and adopted by ordinance No. 2476 on February 27, 1996. The subject property is designated as "Park" which is consistent with the proposed use. The proposed project is also supported by the following West Maui Community Plan goals, objectives, and policies:

Land Use

Goal: An attractive, well-planned community with a mixture of compatible land uses in appropriate areas to accommodate the future needs of the residents and visitors in a manner that provides for the stable social and economic well-being of residents and preservation and enhancement of the region's open spaces and natural environmental resources. (Pg. No. 15)

Objectives and Policy:

- The area bounded by Honoapiilani Highway and Front Street defined as Lahaina Town. Within this core, allow higher density commercial and civic activities with lower density residential uses on the periphery to emphasize the importance of Lahaina Town as

the regional service center and an attraction to residents and visitors alike. (Pg. No. 18)

- Establish, expand and maintain parks, public and private open spaces, public facilities, cemeteries, and public shoreline areas within Lahaina town. Major park spaces to be maintained, expanded, or established are:
 - f. Restoration of and improvements to Malu-ulu-olele Park and Moku`ula Island at the corner of Front and Shaw Streets.
 - g. Maintain Armory Park without sacrificing additional land for parking. (pg. 20)

Cultural Resources

Goal: To preserve and protect significant archaeological, historical and cultural resources and sites that best represent and exemplify the Lahaina region's pre-contact, Hawaiian Monarchy, missionary and plantation history. (Pg. No. 28)

Objectives and Policies:

- Foster an awareness of the diversity and importance of cultural resources and of the history of Lahaina.
- Encourage and protect traditional shoreline and mountain access, cultural practices and rural/agricultural lifestyles. Ensure adequate access to our public shoreline areas for public recreation, including lateral continuity.
- Establish programs to restore, maintain and interpret significant cultural districts, sites and artifacts in both natural and museum settings.

- Promote distinct cultural resources as an identifying characteristic of the region.
- Encourage the development of "cultural parks" for visitation and education.

Urban Design

Goal: An attractive and functionally integrated urban environment that enhances neighborhood character, promotes quality design at the resort destinations of Kaanapali and Kapalua, defines a unified landscape planting and beautification theme along major roads and highways, watercourses, and at major public facilities, and recognizes the importance and traditions of the region. (Pg. No. 33)

Objectives and Policies:

- Maintain the scale, building massing and architectural character of the historic Lahaina Town.
- Front Street landscape planting should provide canopy shade trees, compatible in scale and subordinated to adjacent building. These trees should not obscure the continuous facades of the commercial district; they should allow views of storefronts and the ocean.
- New building and renovation of existing buildings in Lahaina Town should respect the scale, texture, materials, and facades of existing structures in the Lahaina Historic District.

Indigenous Architecture

Goal: Reserving for future implementation Indigenous Architecture, as may be adopted from time to time by the County Council or the Maui County Cultural Resources Commission.

Objectives and Policies

- To legitimize Indigenous Architecture as viable spaces for living, work and recreation.

D. MAUI COUNTY ZONING

The subject property is located in the Historic District No. 1. There were two districts created for Lahaina Town, and Historic District No. 1 differs from Historic District No. 2 in that there are historic structures or sites within this district to be preserved or restored. The purpose of creating this district is to preserve the historic structures and sites within the district and to enable the state and county to make plans for the restoration of historic structures and sites.

In the Historic District No. 1, one of the permitted uses of the subject property is "Parks and Playgrounds" as listed in §19.52.090.3 of the Maui County Code. The existing and proposed use is permitted and conforms with the Lahaina Historic District No. 1 uses.

E. SPECIAL MANAGEMENT AREA

The subject property is located within the Special Management Area (SMA). As such, the proposed improvements will require an SMA Use Permit. Pursuant to Chapter 205A, Hawaii Revised Statutes (HRS), and the Rules and Regulations of the Maui Planning Commission of the County of Maui, projects located within the SMA are evaluated with respect to SMA objectives, policies and guidelines. This section addresses the project's relationship to applicable coastal zone management considerations, as set forth in Chapter 205A, HRS, and the Rules and Regulations of the Maui Planning Commission.

1. Recreational Resources

Objectives: Provide coastal recreational resources accessible to the public.

Policies:

- a. Improve coordination and funding of coastal recreation planning and management; and

- b. Provide adequate, accessible and diverse recreational opportunities in the coastal zone management area by:
1. Protecting coastal resources uniquely suited for recreation activities that cannot be provided in other areas;
 2. Requiring replacement of coastal resources having significant recreational value, including, but not limited to, surfing sites and sandy beaches, when such resources will be unavoidably damaged by development; or requiring reasonable monetary compensation to the State for recreation when replacement is not feasible or desirable;
 3. Providing and managing adequate public access, consistent with conservation of natural resources, to and along shorelines with recreational value;
 4. Providing an adequate supply of shoreline parks and other recreational facilities suitable for public recreation;
 5. Encouraging expanding public recreational use of county, state and federally owned or controlled shoreline lands and waters having recreational value;
 6. Adopting water quality standards and regulating point and non-point sources of pollution to protect and, where feasible, restore the recreational value of coastal waters; and
 7. Encouraging reasonable dedication of shoreline areas with recreational value for public use as part of discretionary approvals or permits, and crediting such dedication against the requirements of Section 46-6 of the Hawaii Revised Statutes.

Response:

The project will encourage the recreational use of a County beach park facility and will enhance accessibility to shoreline areas. The proposed use will also provide opportunities for diverse ocean related experiences through the promotion of canoe sailing activities. The project will not have an adverse affect upon coastal resources. In addition, erosion control measures will be guided by Maui County Code, Chapter 20.08 "Soil Erosion and Sedimentation Control".

2. Historical/Cultural Resources

Objectives: Protect, preserve and where desirable, restore those natural and man-made historic and prehistoric resources in the coastal zone management areas that are significant in Hawaiian and American history and culture.

Policies:

- a. Identify and analyze significant archaeological resources;
- b. Maximize information retention through preservation of remains and artifacts or salvage operation; and
- c. Support state goals for protection, restoration, interpretation and display of historic resources.

Response:

As documented in this report, the proposed project is not anticipated to involve the loss or destruction of any existing historic or cultural resource. Any existing historic or cultural resource on the surface of the property has long been destroyed. The proposed project site has been previously cleared and graded for use as a park and the Lahaina National Guard Armory. There are historic or cultural surface features within or in close proximity to the project site. The palace of Kamehameha III, Hale Piula, was located on the site, and across Front Street, Kamehameha III's residence was located on an island in the middle of the Loko Mokuhinia, a very sacred area for the Hawaiians. It is the vision of Hui O Wa`a Kaulua to "restore the honor and dignity of the site to its original magnitude."

An Archaeological Inventory survey was conducted on the site in 1988. No evidence of Hale Piula was found. However, much of the property was not explored due to the presence of concrete slabs and paving. The report recommended archaeological monitoring of the site during removal of the paved areas. The applicant will perform archaeological monitoring during the removal of the existing structures as well as during the excavation of the foundation for the Keiki Hale. In the event that remains are discovered it will provide for the potential to learn about the culturally and historically significant activities which occurred at the project site in the past.

3. Scenic and Open Space Resources

Objectives: Protect, preserve and, where desirable, restore or improve the quality of the coastal scenic and open space resources.

Policies:

- a. Identify valued scenic resources in the coastal zone management area;
- b. Insure that new developments are compatible with their visual environment by designing and locating such developments to minimize the alteration of the natural land forms and existing public views to and along the shoreline;
- c. Preserve, maintain and, where desirable, improve and restore shoreline open space and scenic resources; and
- d. Encourage those developments which are not coastal dependent to locate in inland areas.

Response:

The proposed structures have been located in the same general area as the existing buildings and will not represent a significant increase in visual obstructions of view corridors towards the ocean from Front Street. The project is anticipated to have a positive impact on the urban design character of the immediate area by utilizing traditional architectural materials and styles, increasing landscape plantings and reducing the impact of the automobile along Front Street.

4. Coastal Ecosystems

Objectives: Protect valuable coastal ecosystems from disruption and minimize adverse impacts on all coastal ecosystems.

Policies:

- a. Improve the technical basis for mature resource management;
- b. Preserve valuable coastal ecosystems of significant biological or economic importance;
- c. Minimize disruption and degradation of coastal water ecosystems by effective regulation of stream diversions, channelization and similar land and water uses, recognizing competing water needs; and
- d. Promote water quantity and quality planning and management practices which reflect the tolerance of fresh water and marine ecosystems and prohibit land water uses which violate state water quality standards.

Response:

The completion of the proposed project will not disrupt or impact coastal ecosystems. Appropriate soil erosion mitigation measures will be implemented during the construction of the project to protect the marine environment from potential impacts of construction runoff.

5. Economic Uses

Objectives: Provide public or private facilities and improvements important to the State's economy in suitable locations.

Policies:

- a. Concentration in appropriate areas the location of coastal dependent development necessary to the state's economy;
- b. Insure that coastal dependent development such as harbors and ports, visitor facilities, and energy-generating facilities are located, designed, and constructed to minimize adverse social, visual and environmental impacts in the coastal zone management areas; and
- c. Direct the location and expansion of coastal dependent developments to areas presently designated and used for such developments and permit reasonable long-term growth at such areas, and permit coastal dependent development outside of presently designated areas when:
 1. Utilization of presently designated locations is not feasible,
 2. Adverse environmental effects are minimized, and
 3. The development is important to the State's economy.

Response:

The proposed canoe clubs and associated activities require that they be located within close proximity to the coast. From a safety standpoint being located just south of Lahaina Harbor and behind the off-shore reef, the site is protected from powerful Kona Storm wave action and provides safe conditions on a regular basis for the double-hulled canoes.

6. Coastal Hazards

Objectives: Reduce hazard to life and property from tsunami, storm waves, stream flooding, erosion and subsidence.

Policies:

- a. Develop and communicate adequate information on storm wave, tsunami, flood, erosion and subsidence hazard;

- b. Control development in areas subject to storm wave, tsunami, flood, erosion and subsidence hazard;
- c. Ensure that development comply with requirements of the Federal Flood Insurance Program; and
- d. Prevent coastal flooding from inland projects.

Response:

The average elevation of the park is approximately seven (7) feet above MSL and, thus, the majority of the park site is above established base flood elevations. Any proposed structures will be built in accordance with the Flood Insurance Rate Programs established guidelines. As such, the proposed project should have no adverse impact upon the subject property or its neighbors with regards to flood hazard potential. With regards to potential impacts from shoreline erosion, it is the applicant's position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka. Given that the structure will be built using traditional Hawaiian building techniques and materials, this will not be a significant endeavor.

7. Managing Development

Objectives: Improve the development review process, communication, and public participation in the management of coastal resources and hazard.

Policies:

- a. Effectively utilize and implement existing law to the maximum extent possible in managing present and future coastal zone development;
- b. Facilitate timely processing of the application for development permits and resolve overlapping of conflicting permit requirements; and
- c. Communicate the potential short and long-term impacts of proposed significant coastal developments early in their life-cycle and in terms understandable to the general public to facilitate public participation in the planning and review process.

Response:

The development of the subject property is being conducted in accordance with applicable State and County requirements. Opportunity for review of the proposed action is provided through the Environmental Assessment Review process and County's Special Management Area (SMA) permitting process.

8. Public Participation

Objective: Stimulate public awareness, education and participation in coastal management.

Policies:

- a. Maintain a public advisory body to identify coastal management problems and to provide policy advice and assistance to the coastal zone management program;
- b. Disseminate information on coastal management issues by means of educational materials, published reports, staff contact and public workshops for persons and organizations concerned with coastal related issues, development, and government activities; and
- c. Organize workshops, policy dialogues, and site specific mediations to respond to coastal issues and conflict.

Response:

The public will have ample opportunity to review and comment on the proposed project. A "Notice of Public Hearing" to the surrounding land owners will be sent out 30 days prior the Maui Planning Commission hearing of the application for the Special Management Area Permit. Public hearing dates and location maps will also be published in The Maui News. The public will be allowed to participate in the public hearing portion of the Maui Planning Commission.

9. Beach Protection

Objectives: Protect beaches for public use and recreation.

Policies:

- a. Locate new structures inland from the shoreline setback to conserve open space and to minimize loss of improvements due to erosion;
- b. Prohibit construction of private erosion-protection structures seaward of the shoreline, except when they result in improved aesthetic and engineering solutions to erosion at the sites and do not interfere with existing recreational and waterline activities; and
- c. Minimize the construction of public erosion-protection structures seaward of the shoreline.

Response:

This application involves a request for a Shoreline Setback Variance for the construction of the Keiki Canoe Hale (Phase I) within the shoreline setback area. The structure will be setback approximately 25 feet from the shoreline, which

will allow for continued lateral access and the remainder of the park land within the Shoreline Area will remain in open space. The footings for the wood posts will be made of lava stone. Only in the event of extreme beach erosion will there be a risk of the structure failing. It should be noted that an alternative to prevent this from occurring would be to grout and structurally fortify the foundations of the structure. However, this would compromise the an established policy aimed at preventing structures from adversely affecting beach processes. It is the applicant's position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka. Given that the structure will be built using traditional Hawaiian building techniques and materials, this will not be a significant endeavor.

10. Marine Resources

Objective: Implement the State's ocean resource management plan.

Policies:

- a. Exercise an overall conservation ethic, and practice stewardship in the protection, use, and development of marine and coastal resources;
- b. Assure that the use and development of marine and coastal resources are ecologically and environmentally sound and economically beneficial;
- c. Coordinate the management of marine and coastal resources and activities management to improve effectiveness and efficiency;
- d. Assert and articulate the interest of the state as a partner with federal agencies in the sound management of the ocean resources within the United States exclusive economic zone;
- e. Promote research, study, and understanding of ocean processes, marine life, and other ocean resources in order to acquire and inventory information necessary to understand how ocean development activities relate to and impact upon the ocean and coastal resources; and
- f. Encourage research and development of new, innovative technologies for exploring, using, or protecting marine and coastal resources.

Response:

As noted above, the project will have a minimal potential for negative impact on the region's coastal or marine environment. Implementation of the project and education regarding the traditional use of Hawaiian sailing canoes will provide a better understanding of our ocean resources.

F. ENVIRONMENTAL ASSESSMENT SIGNIFICANCE CRITERIA

1. *Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;*

As documented in this report, the proposed project will not involve the loss or destruction of any natural or cultural resource. To the contrary, the proposed project will result in the education of residents and visitors in the Hawaiian cultural practice of canoe sailing. Any existing cultural resource on the property has long been destroyed. There is minimal potential for unearthing historic or cultural remains due to previous ground disturbance and minimal excavation activities. In the event that remains are discovered it will provide for the potential to learn about the culturally and historically significant activities which occurred at the project site in the past.

2. *Curtails the range of beneficial uses of the environment;*

The project will enhance the opportunity to experience beneficial uses of our natural environment through the promotion of Hawaiian canoe sailing.

3. *Conflicts with the state's long-term environmental policies or goals and guidelines as expressed in Chapter 344, HRS, and any revisions thereof and amendments thereto, court decisions, or executive orders;*

There are no anticipated impacts which would result in negative environmental impacts that would conflict with the State's long term environmental policies or goals.

4. *Substantially affects the economic or social welfare of the community or state;*

The proposed project will result in positive social benefits for the community by providing an alternative social, cultural, recreational and educational experience for the community, especially its youth.

Kamehameha Iki Park
Final Environmental Assessment

5. *Substantially affects public health;*

The project will have no impact on public health.

6. *Involves substantial secondary impacts, such as population changes or effects on public facilities;*

The project will have a positive effect by enhancing an existing public facility which has been underutilized in the past. There will be no secondary population impacts.

7. *Involves a substantial degradation of environmental quality;*

As documented in this report, due to the limited nature of construction activities and the previous development of the site, there is minimal potential for degradation of environmental quality.

8. *Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;*

It is hoped that the proposed project will lead to a larger commitment to the traditional practice of Hawaiian canoe sailing, both at this project site and throughout the State and Pacific basin. However, these intended effects will not have a considerable impact on the environment.

9. *Substantially affects a rare, threatened, or endangered species, or its habitat;*

There are no rare, threatened, or endangered species or habitat at the project site.

10. *Detrimentially affects air or water quality or ambient noise levels;*

As documented in this report, due to the limited nature of construction activities and the previous development of the site, there is minimal potential for degradation of air or water quality or ambient noise levels.

11. *Affects or is likely to suffer damage by being located in an environmentally sensitive area such as a flood plain, tsunami zone, beach, erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters;*

The project's structures are located outside of any flood designated area or will be constructed above the base flood elevation and in consonance with the applicable Federal and local Flood Insurance Program regulations. With regards to potential impacts from shoreline erosion, it is the applicant's position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka. Given that the structure will be built using traditional Hawaiian building techniques and materials, this will not be a significant endeavor.

12. *Substantially affects scenic vistas and viewplanes identified in county or state plans or studies; or,*

As discussed above, the proposed structures have been situated so as to not significantly alter existing views to or along the shoreline.

- 13 *Requires substantial energy consumption.*

There will be minimal energy consumption needs both during the construction of this project and once it is completed.

G. SHORELINE SETBACK VARIANCE RULES

In accordance with section 12-5-13(a) of the Rules of the Maui Planning Commission Relating to the Shoreline Area of the Island of Maui, a shoreline area variance may be granted when it is found that the proposed structures are necessary for or ancillary to:

- "(5) Boating, maritime, or water sports recreational facilities;"

As previously discussed, the Keiki Hale will be used primarily for the storage of sailing canoes, and is thus necessary for boating and maritime activities.

Once it is established that a structure or activity qualifies as an item under Section 12-5-13(a), the rules further provide that no variance shall be granted unless appropriate conditions are imposed:

(1) To maintain safe lateral access to and along the shoreline or adequately compensate for its loss;

The proposed Keiki Hale will not impede lateral access to or along the shoreline. The structure will be setback approximately 25 feet from the shoreline, which will allow for continued lateral access and the remainder of the park land within the Shoreline Area will remain in open space.

(2) To minimize risk of adverse impacts on beach processes.

The structure will be setback approximately twenty five feet from the shoreline. Based on historical photo analysis, historical uses and recent shoreline surveys, it appears that there is low risk of severe erosion retreat occurring at the site. The project site is not armored, in contrast to as are the properties immediately to the north. The project site does not appear to have been negatively affected by the seawalls to the north, this could be due to the predominately northern currents along this section of coastline. However, the applicant acknowledges the imprecise nature of predicting shoreline erosion/accretion rates and as such has taken a position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka (east).. In the unlikely event that the beach in this area retreats twenty five feet, there is minimal risk of the structure creating an adverse impact on beach processes because the footings for the wood posts will be made of ungrouted lava stones. In the event that wave action undermines the stones they will give way and not affect beach processes.

(3) To minimize risk of structures failing and becoming loose rocks or rubble on public property.

The footings for the wood posts will be made of lava stone. Only in the event of extreme beach erosion will there be a risk of the structure failing. The amount of loose rocks on the beach will be minimal due the relatively small section of footings which would potentially be affected. It should be noted that an

alternative to prevent this from occurring would be to grout and structurally fortify the foundations of the structure. However, this would compromise the preceding condition which requires that the structure not adversely affect beach processes. It is the applicant's position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka. Given that the structure will be built using traditional Hawaiian building techniques and materials, this will not be a significant endeavor.

(4) To minimize adverse impacts on public views to, from and along the shoreline.

The Hale will not have an impact on existing views to the shoreline because of its placement in relation to the existing garage/workshop structure and the future Hale Wa`a. Views along the shoreline will not be affected because of the twenty five foot setback from the shoreline and the location of existing structures to the north and south of the park which are setback approximately the same distance. It is anticipated that the traditionally built structure and associated canoe related activities will create enhance the visual character and experience of the shoreline in this area.

H. CULTURAL RESOURCES COMMISSION

Provided below is an assessment of how the proposed improvements at Kamehameha Iki Park comply with the various documents adopted by the Maui County Cultural Resources Commission (MCCRC).

- a) The County's Cultural Resources Management Plan provides three specific recommendations which supports the proposed project:
 - 9. Encourage the private sector and State to implement meaningful interpretive programs at significant and archaeological sites.
 - 11. Evaluate sites on County owned lands for possible restoration and interpretive projects.
 - 17. Organize community services and private organizations to serve

as guardians and guides at interpretive sites and to monitor and assist in providing security and control at sites.

One of the project's main goals is to provide the County of Maui with a Hawaiian heritage site where Hawaiian culture is taught, shared and preserved. The historical significance of the project site is an important aspect of the group's objectives. The rich history of the site and surrounding area creates a unique opportunity for interpretive historic preservation. When completed, the park will provide an interpretive program which educates visitors in the significance of the park history, most notably as the site of King Kamehameha III's palace. Based on the foregoing, the proposed project is consistent with the recommendations of the CRMP.

- b) "Lahaina Environmental Design Manual" (LEDM) defines the Historic Architectural Styles in the Lahaina Area in three (3) periods. The first is the period before 1820 and is referred to as Native Hawaiian. The second period is the 19th Century and is referred to as the Missionary period, and this is followed by the middle 1800s through early 1900s, referred to as the Victorian period.

The proposed improvements are consistent with styles from the first period - Native Hawaiian, and as such are consistent with the LEDM.

- c) "The Architectural Style Book for Lahaina" provides further details regarding the different styles from the three historical periods. The proposed structures are consistent in terms of shape, form, scale and materials with the structures shown on Sheets B-1 through B-3.
- d) "Office of Hawaiian Affairs Guidelines for the Consideration of Traditional Native Hawaiian Cultural Values in Historic Preservation Review" discusses the purpose of Historic Preservation and Kinds of Historic Value. The report explains the significance of historic preservation as it gives meaning to being Hawaiian, which enhances the entire community's sense of history and identity.

The proposed improvements at Kamehameha Iki Park are supportive of and intended to foster the following categories of public values identified in OHA's document:

- Architectural value: the importance of a property as an example of an architectural type or period, the work of a particular architect or group, or the application of particular concepts, methods or technology;
 - Associative value: the importance of a property as a reminder of an event, a person, a process or trend affecting the history of the world, the nation, or region, community or group;
 - Use value: the potential of an historic property for continued productive use as a part of modern society;
 - Informational value: the potential of an historic property to provide information, through recordation or archaeological research that is useful to the study of important aspects of the past;
 - Cultural value: the contribution made by an historical property to an ongoing society or cultural system. It is this sort of value that is the focus of these guidelines.
- e) One of the objectives of the "Proposal for the Historical Restoration & Preservation of Lahaina", prepared in 1961, was to "develop a comprehensive plan for the future growth of Lahaina, in which the historic sites and plan for the cultural area take their place in a framework of the larger general plan for the town and district of Lahaina."

The restoration plan identified a number of specific actions involving the preservation of existing historic buildings and sites as well as the rebuilding of structures which formerly existed. Major elements of the plan include the relocation of Kamehameha III Elementary School and reconstruction of royal residences once present at the site, the reconstruction of Kamehameha III's residence and Moku'ula Island, as

Kamehameha Iki Park
Final Environmental Assessment

well as the surrounding water feature (Mokuhinia), reconstruction of Hale Piula, Kamehameha III's palace, etc. In all, the plan recommends reconstructing approximately 20 historical buildings which had been previously demolished.

Obviously, many aspects of the restoration plan have not been implemented. One of the plan's major tenets, the restoration of significant features associated with the region of Kamehameha III, is a goal that is being actively pursued by members of the community at Moku`ula.

As noted above, a major goal of the project is to inform visitors to the park about the historical past associated with the site, most notably the site's importance during the reign of Kamehameha III. Buildings at the site have been designed after traditional Hawaiian architecture, plans for the education center-research room were developed using the plans for Princess Nahienaena's house shown on page 37 of this report.

Based on the above, this project is consistent with the 1961 historic restoration plan.

V. FINDINGS AND CONCLUSIONS

The proposed action will result in positive impacts with regard to the West Maui recreational and cultural opportunities and the enhancement and preservation of County park space.

There will be minimal construction related impacts from the project due to the phase or sequencing approach to project implementation as well as the previous development of the site.

The utilization of traditional building styles and materials will compliment the historic and cultural significance of the site and is consistent with long range cultural revitalization of the immediate area.

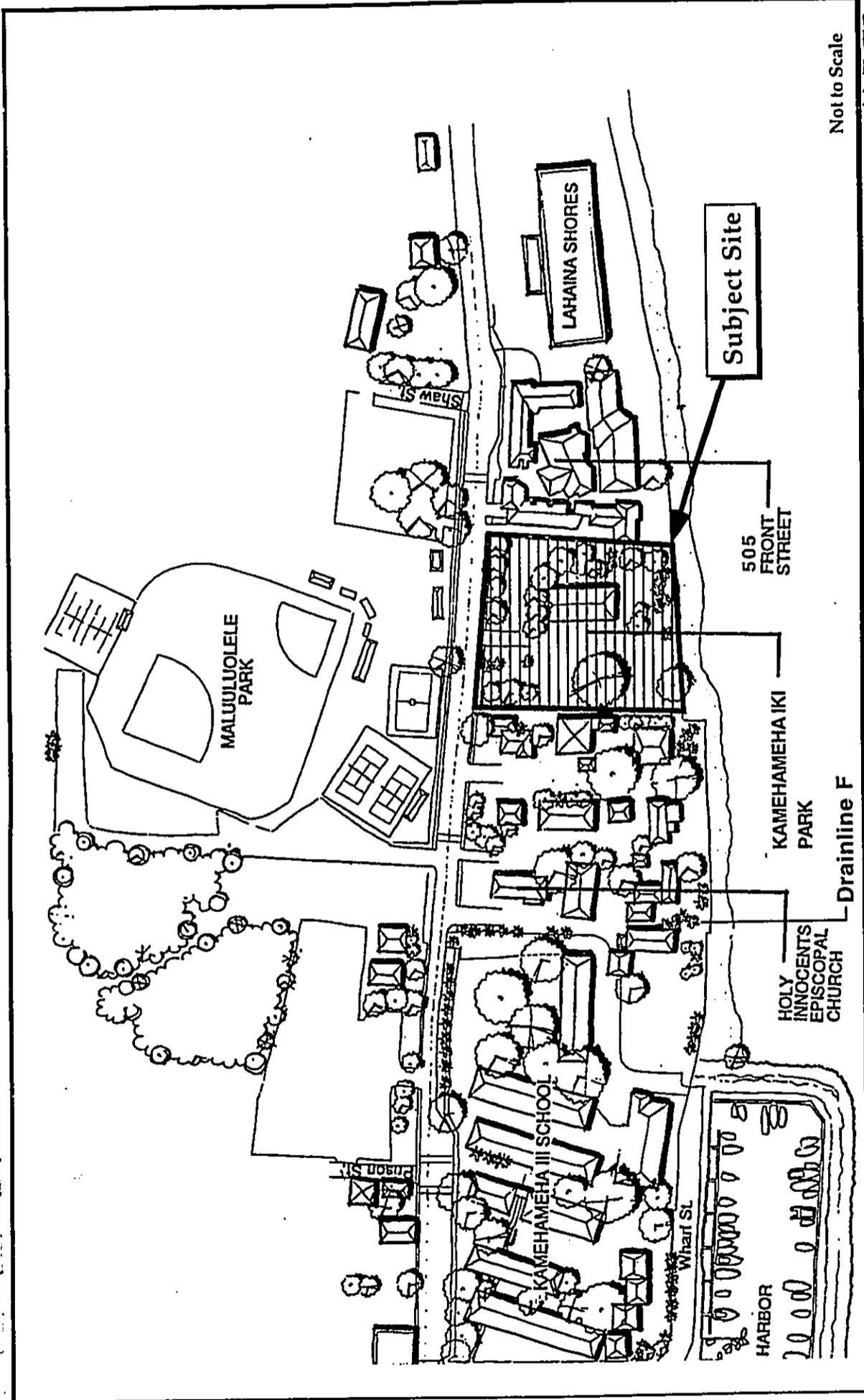
Based on the foregoing analysis and conclusion, it is determined that the proposed project will not result in significant impacts to the environment and that a Finding of No Significant Impact is warranted. The preceding analysis also supports the approval of the subject request for a Special Management Area Use Permit, Historic District Approval and Shoreline Setback Variance.

VI. REFERENCES

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- County of Maui, Maui Planning Department. The General Plan of the County of Maui, 1990 Update, 1991.
- County of Maui, Office of Economic Development, Maui Economic Development Board, Inc., and Business Research Library. Maui County Data Book 1995, February 1996.
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- US Department of Agriculture, Soil Conservation Service in cooperation with the University of Hawaii Agricultural Experiment Station. Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii, 1972.
- Wilson, Okamoto and Associates. Maui Community Plan Update, Land Use Technical Study, June 1992.
- Xamanek Researches. Archaeological Inventory Survey at Historic Site #15, November, 1988.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

FIGURES

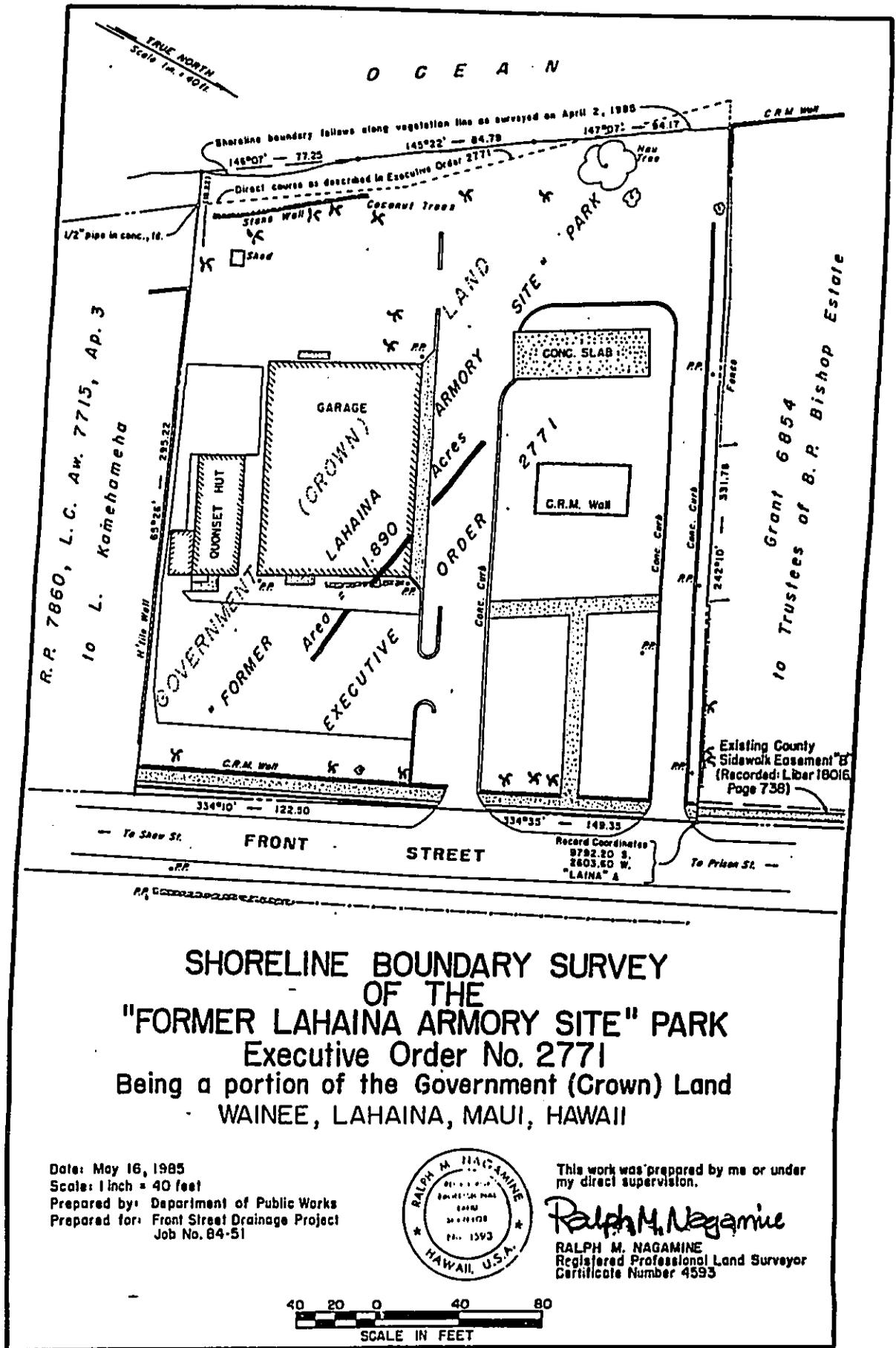


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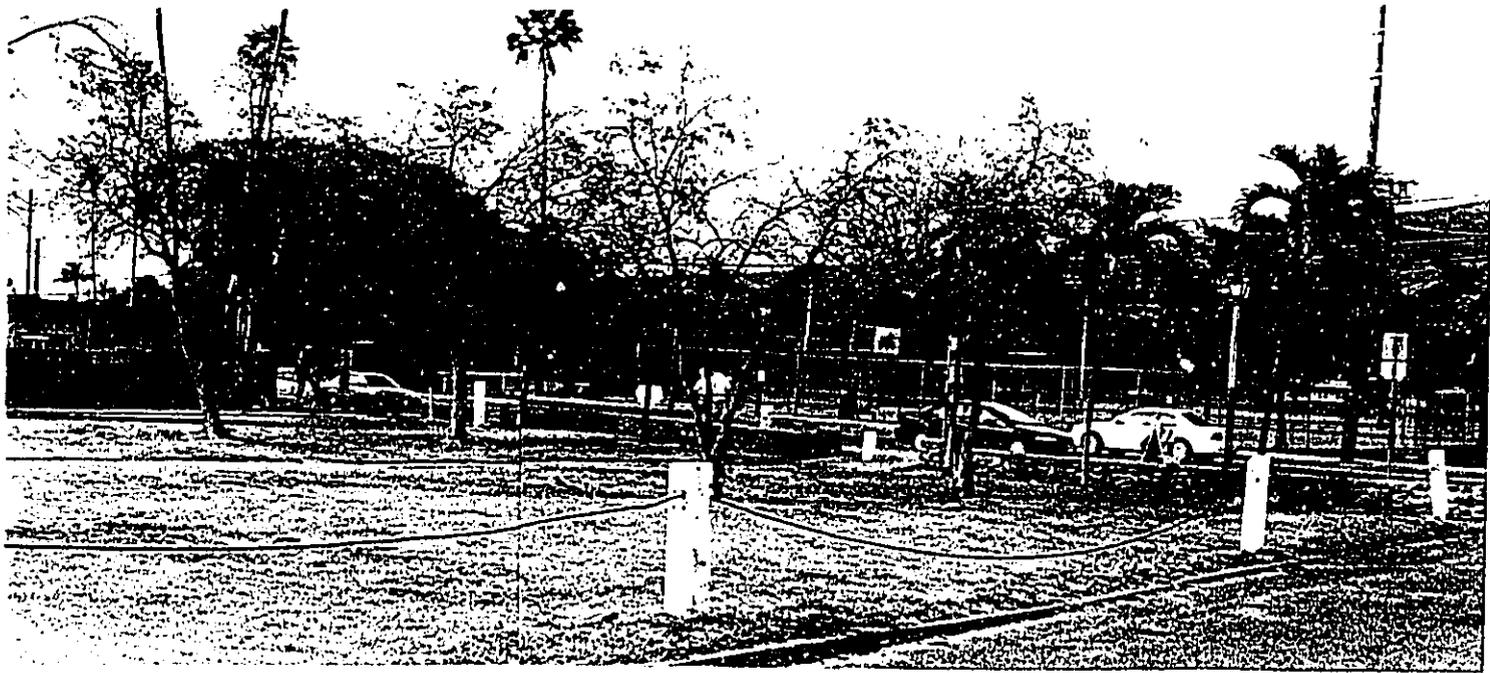
Area Location Map
 Kamehameha Iki Park
 Lahaina, Maui, Hawai'i

Figure No. 1b



Kamehameha Iki Park
Existing Site Conditions

Figure No. 2a



Mauka (East) View - Showing portions of Parking Lot, Front Street and M

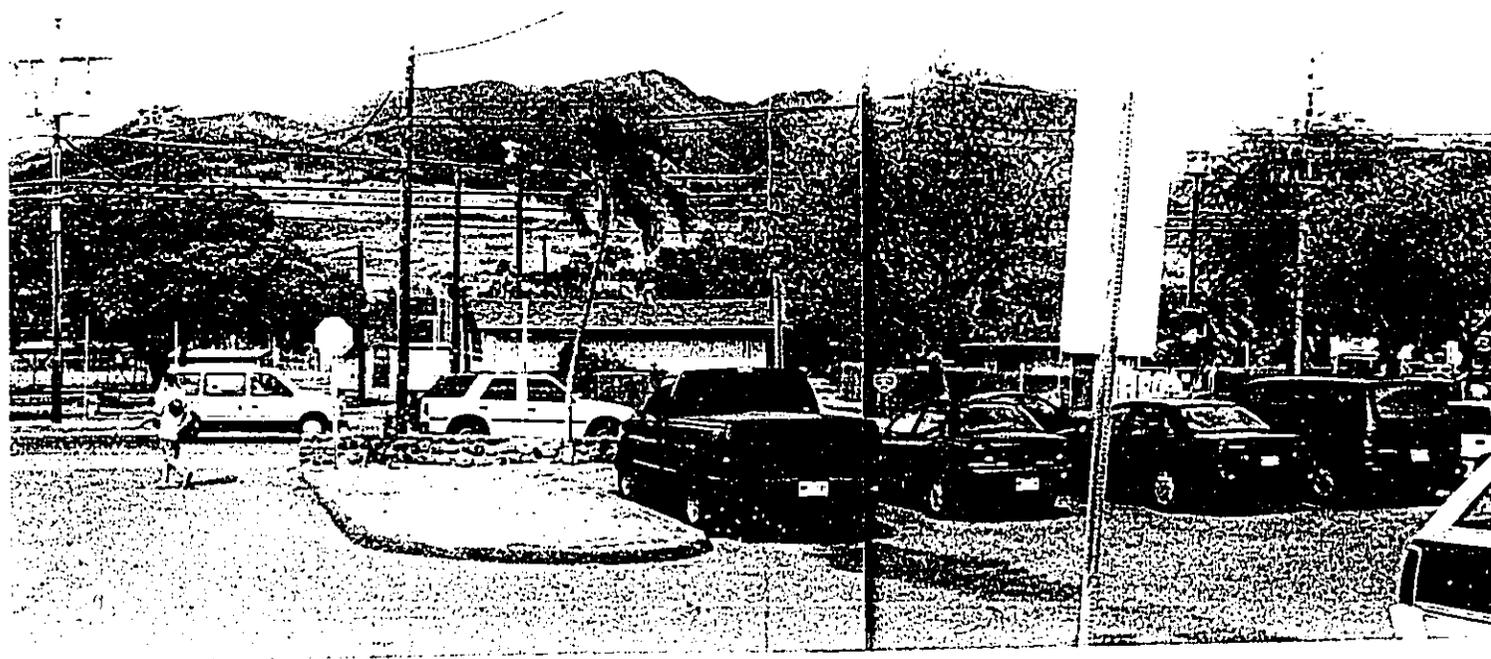


Makai (West) View - Showing Portion of Quonset Hut (former Light Bringer



Kamehameha Iki Par

Site Photographs



g Lot, Front Street and Malu`ulu O Lele Park

Hut (former Light Bringers) and Garage/Workshop

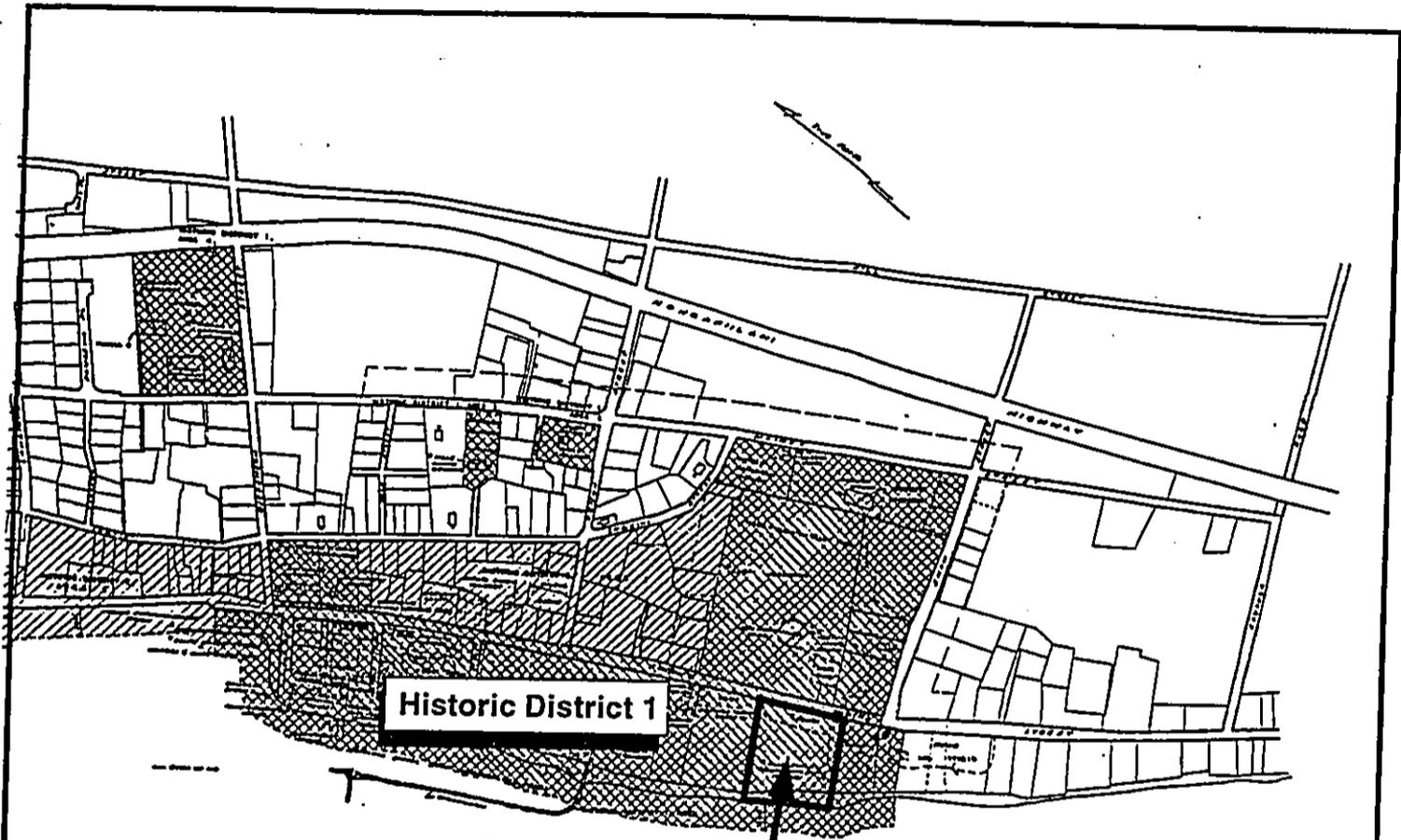


amehameha Iki Park

Site Photographs

Figure No. 2b





- LEGEND**
- HISTORIC DISTRICT 1
 - HISTORIC DISTRICT 2
 - HISTORIC DISTRICT 3
 - HISTORIC DISTRICT 4
 - HISTORIC DISTRICT 5
 - HISTORIC DISTRICT 6
 - HISTORIC DISTRICT 7
 - HISTORIC DISTRICT 8
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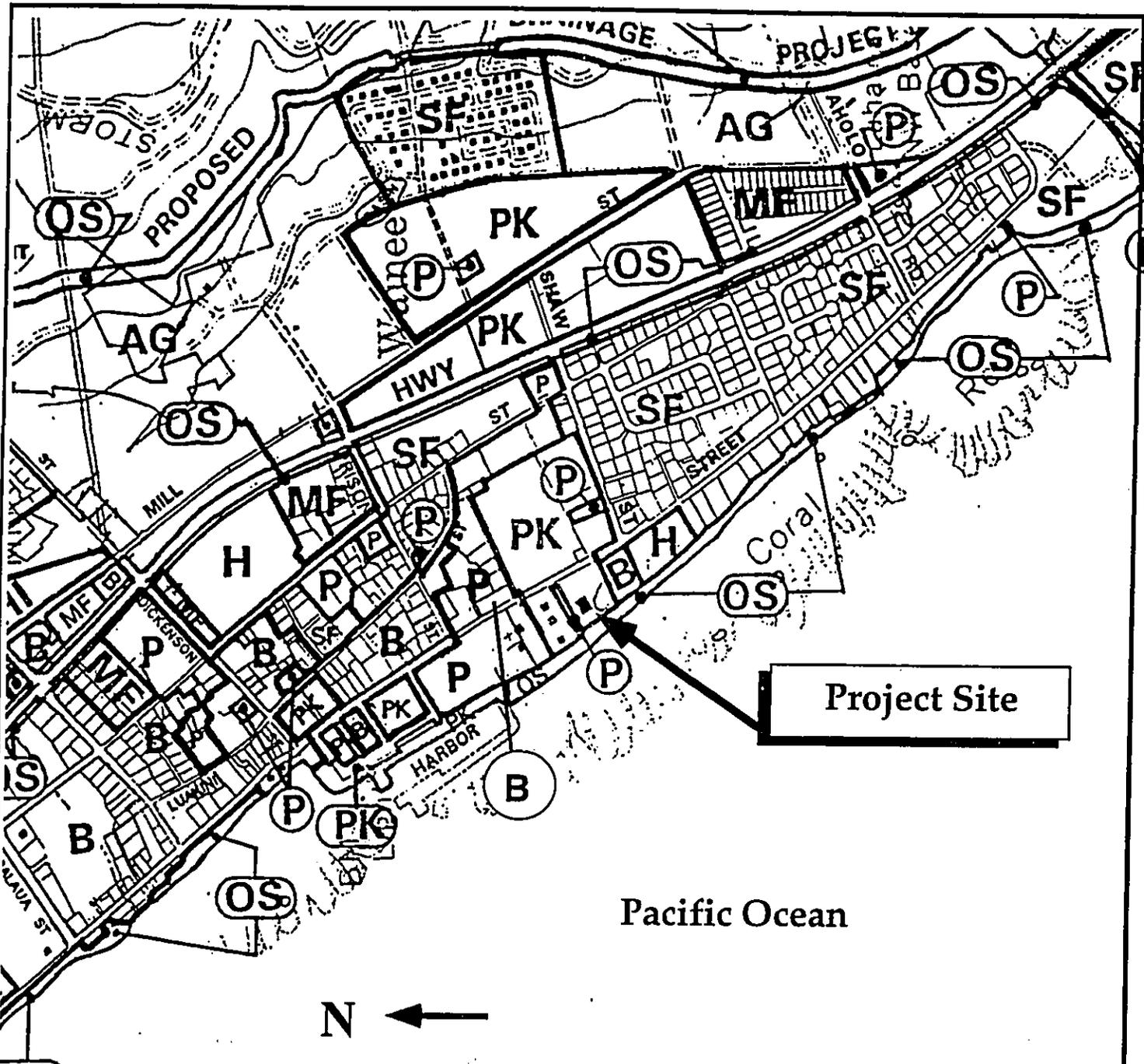
Project Site

MAUI PLANNING COMMISSION COUNTY OF MAUI	
LAHAINA HISTORIC DISTRICTS MAP SHOWING HISTORIC DISTRICTS 1 and 2	
APPROVED:	PUBLIC HEARINGS: 3-11-68
CHAIRMAN - COUNTY OF MAUI	ADOPTED: 4-21-68
APPROVED: 3-11-68	ORDINANCE: 10 818
CHAIRMAN - <i>James Lee</i>	DATE: 12-14-68
CHAIRMAN - MAUI PLANNING COMMISSION	
PREPARED BY: MAUI PLANNING COMMISSION P. O. BOX 1887 LAHAINA, HAWAII	<i>Chris Hart</i> PLANNING DIRECTOR

Land Zoning Map
Kamehameha Iki Park
525 Front Street
Lahaina, Maui, Hawai'i



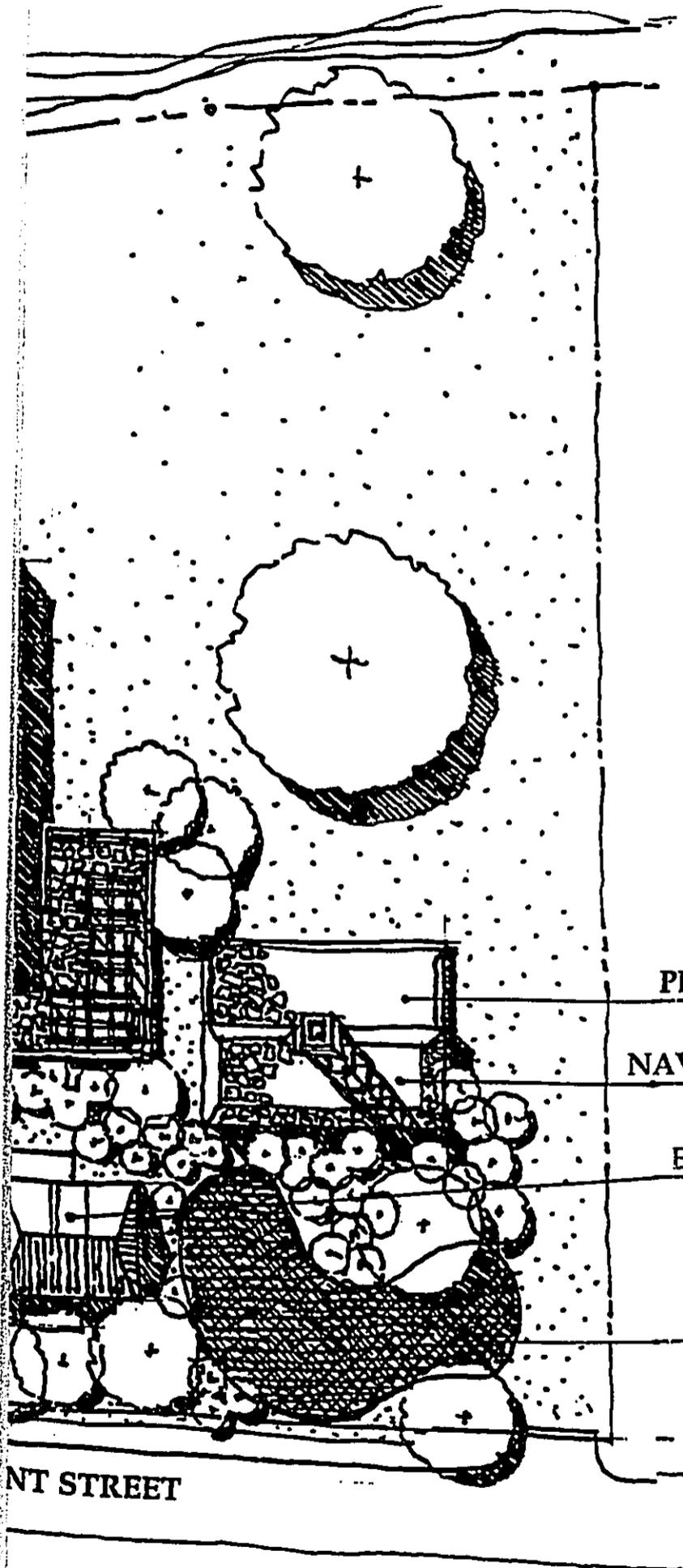
Figure No. 3



West Maui Community Plan
 Kamehameha Iki Park
 525 Front Street
 Lahaina, Maui, Hawai'i
 TMK 4-6-02: 10



Figure No. 4



PERFORMANCE STAGE

NAVIGATION PLATFORM

EDUCATION CENTER -
RESEARCH ROOM

POND

NT STREET

EHA IKI PARK
ot Site Plan



**CHRIS
HART**
& PARTNERS
JUNE 9, 1998

Figure 5

KEIKI HALE 20'x54'

PHASE I

MEDICINAL PLANT GARDEN

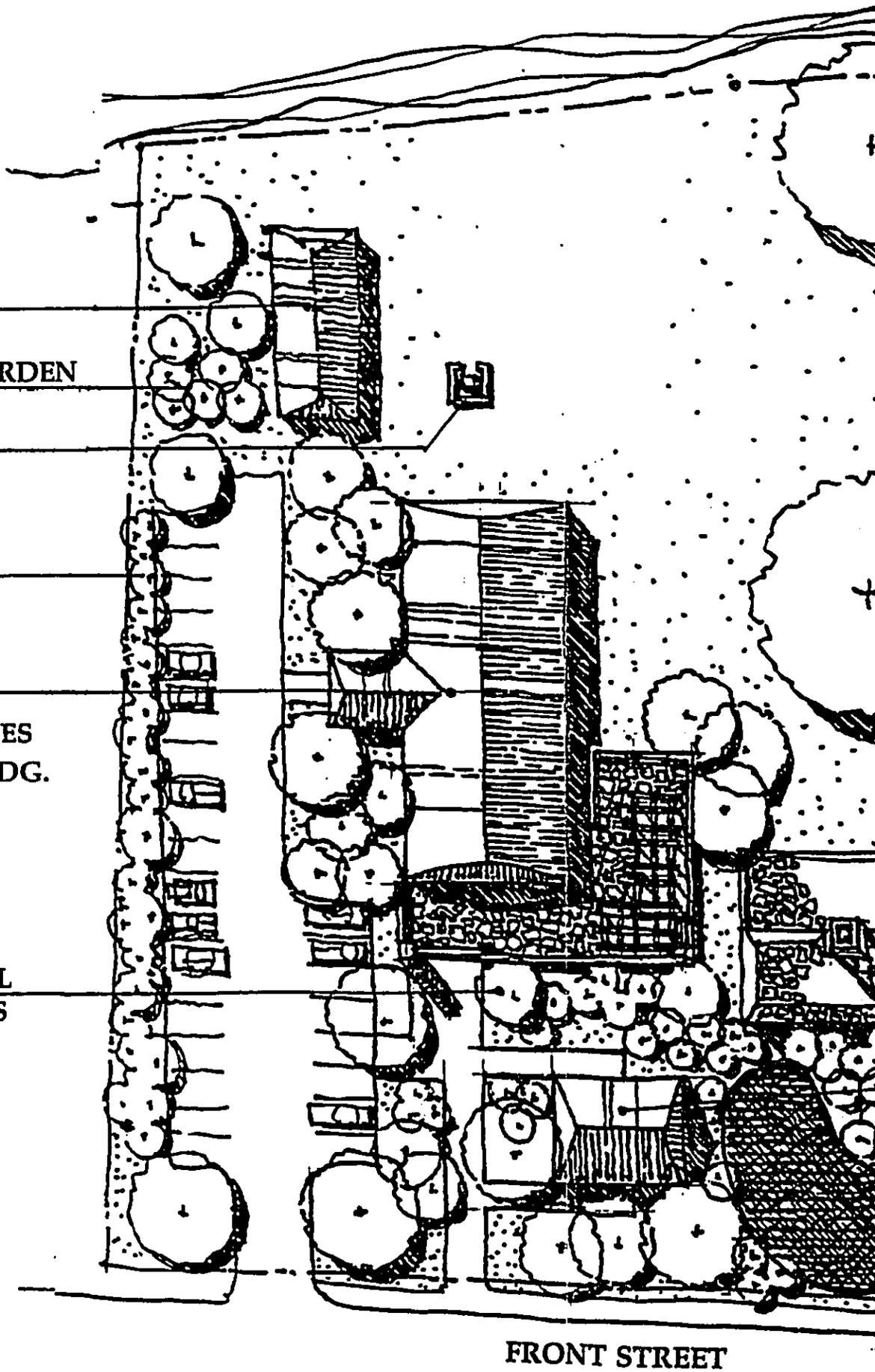
FISHERMAN SHRINE

SCREEN PLANTING

HALE WA'A

- DOUBLE HULL CANOES
- MULTI-PURPOSE BLDG.

**HAWAIIAN MEDICINAL
PLANTS**

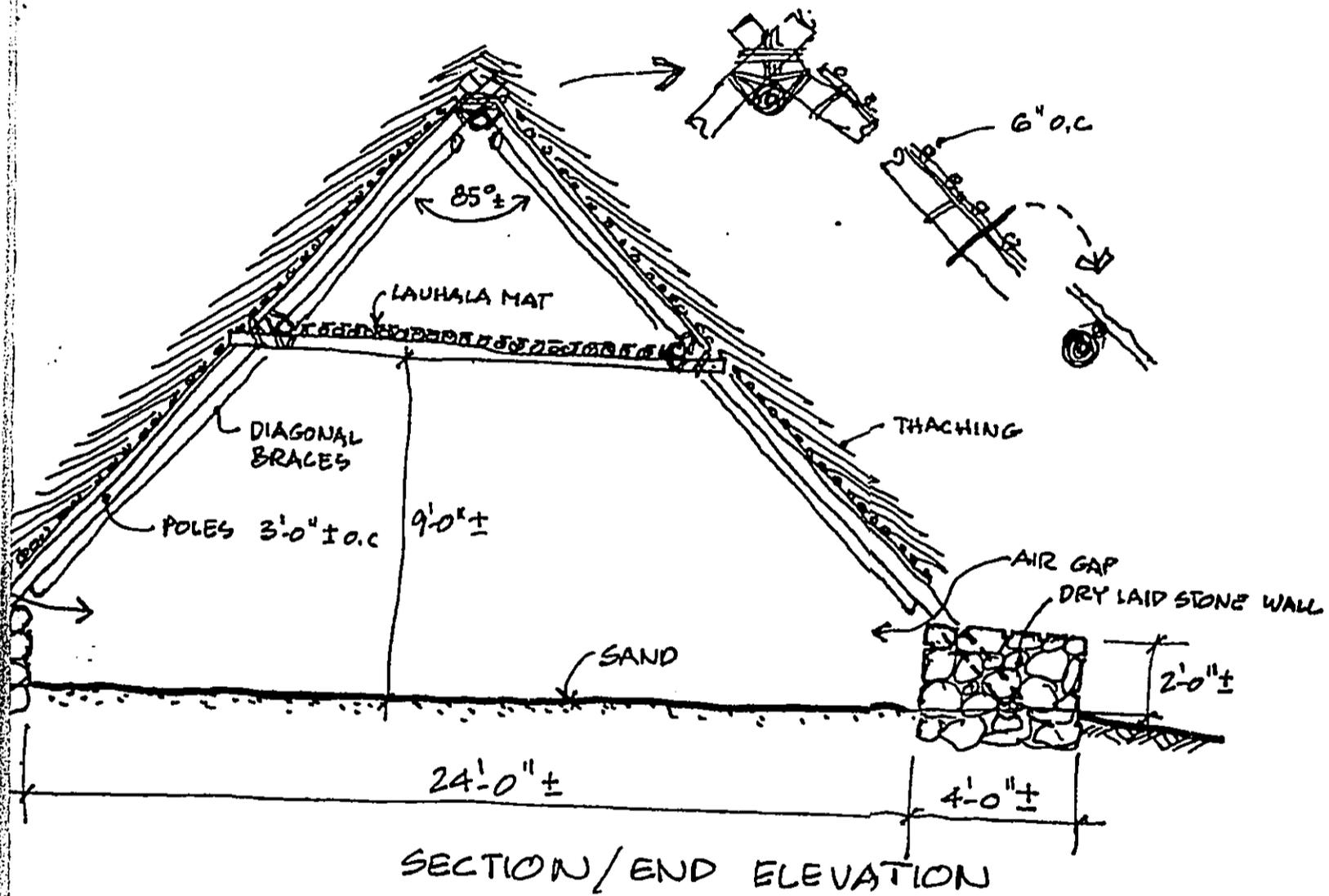


FRONT STREET

SCALE: 1" = 40'

KAMEHAMEHA IKI PARK

Concept Site Plan

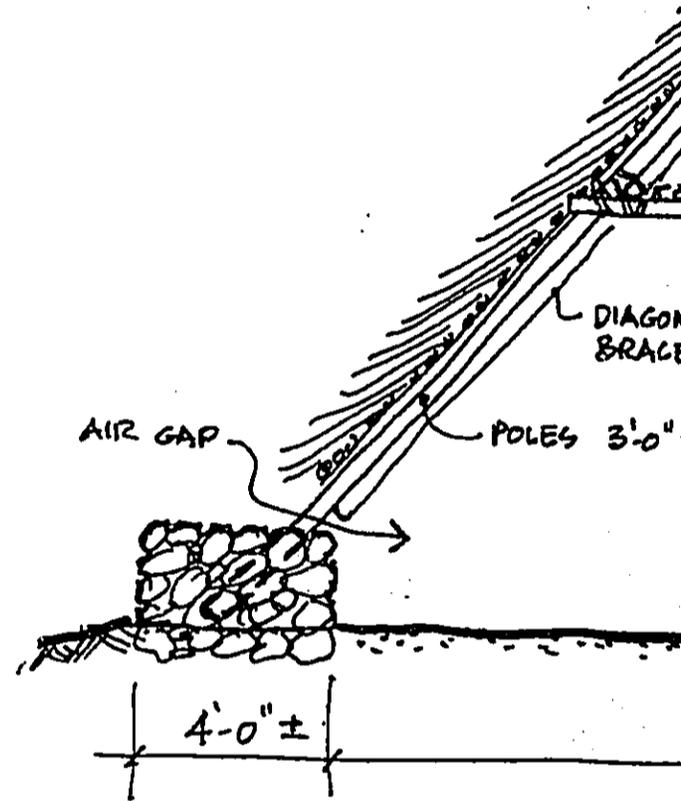
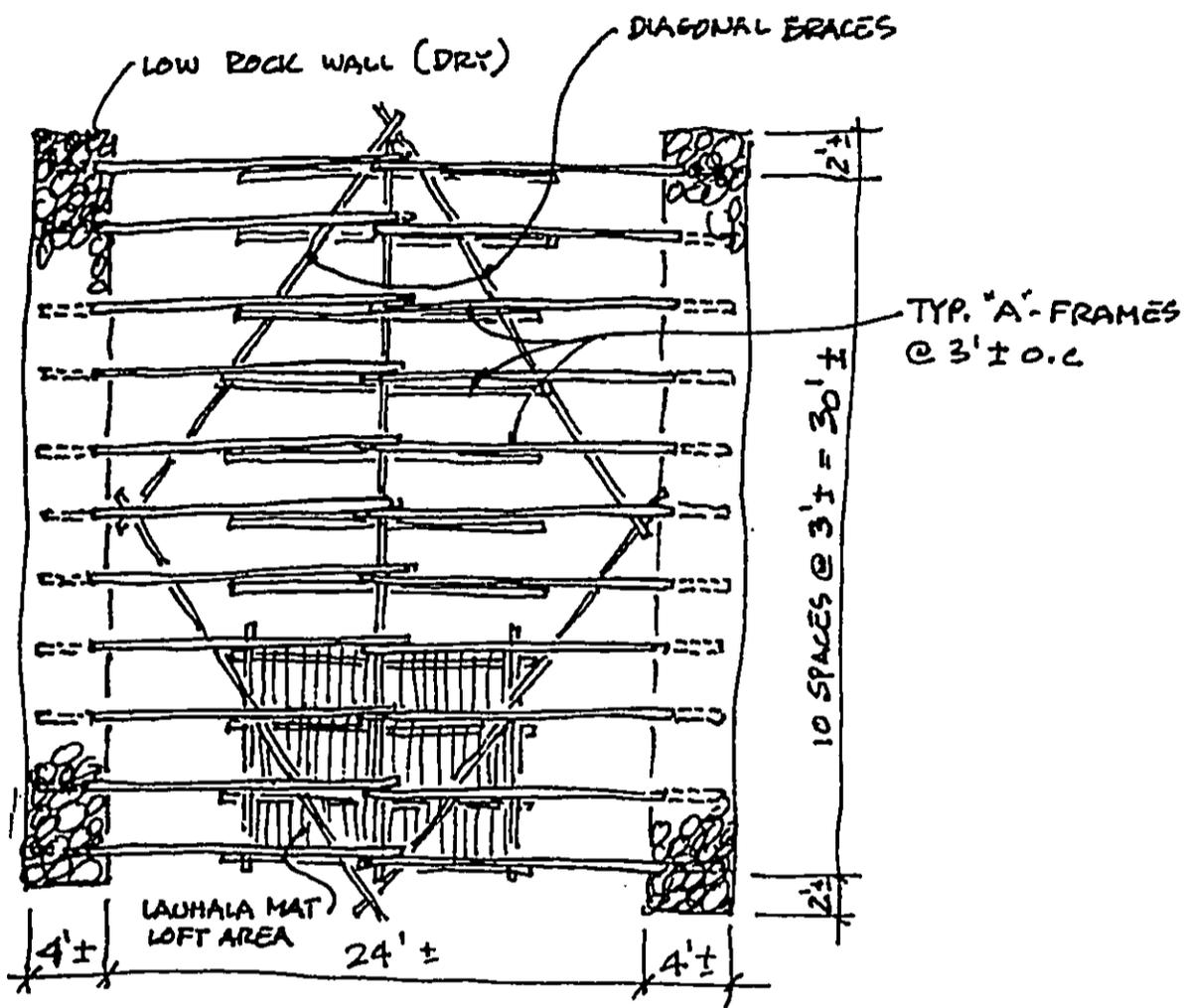


AIHAN CANOE HALE
0"
HR

HA IKI PARK
LE (PHASE I)



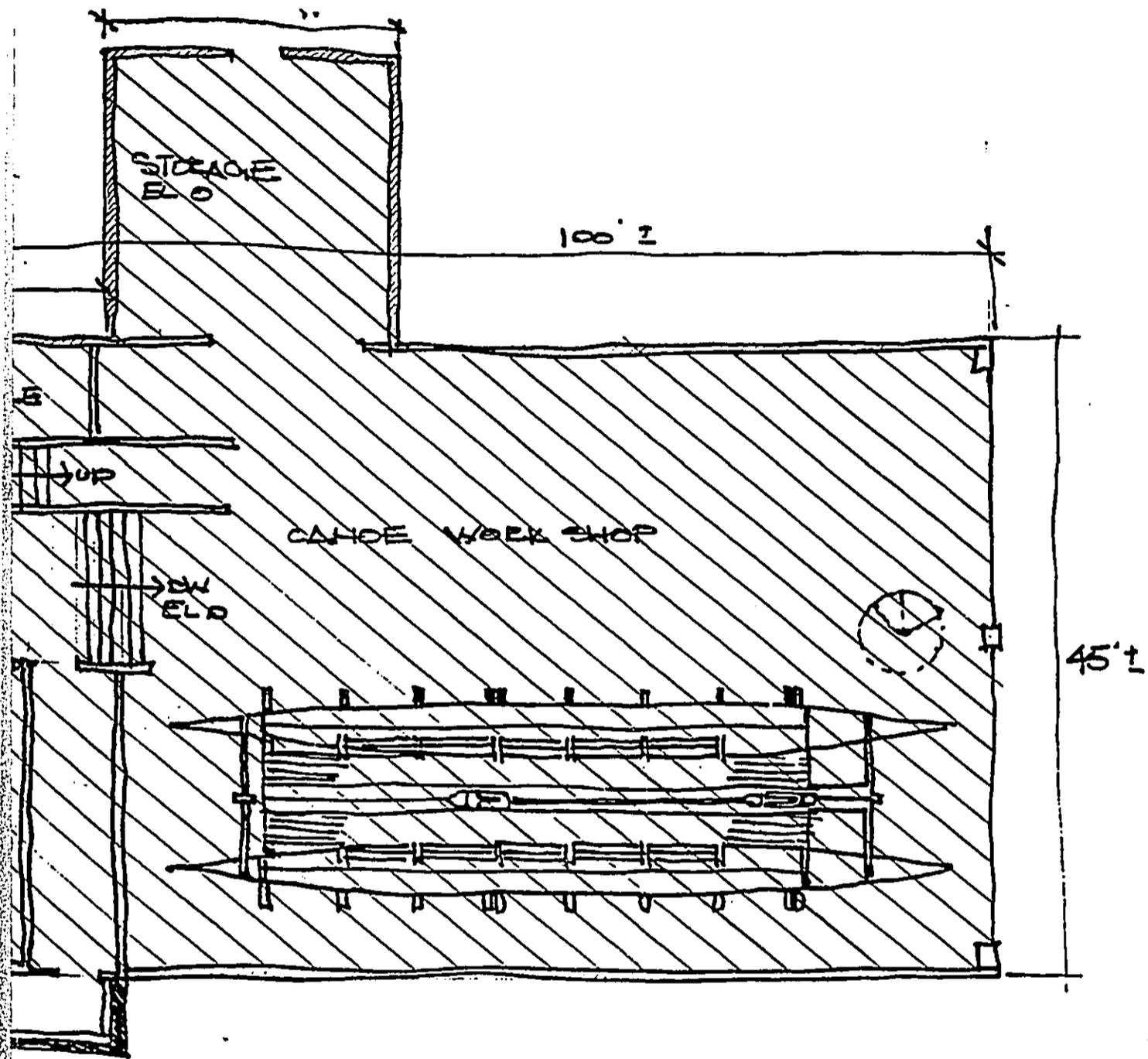
Figure 6A



HAWAIIAN CANOE
1/4" = 1'-0"

KAMEHAMEHA IKI I

KEIKI HALE (PHASE I)

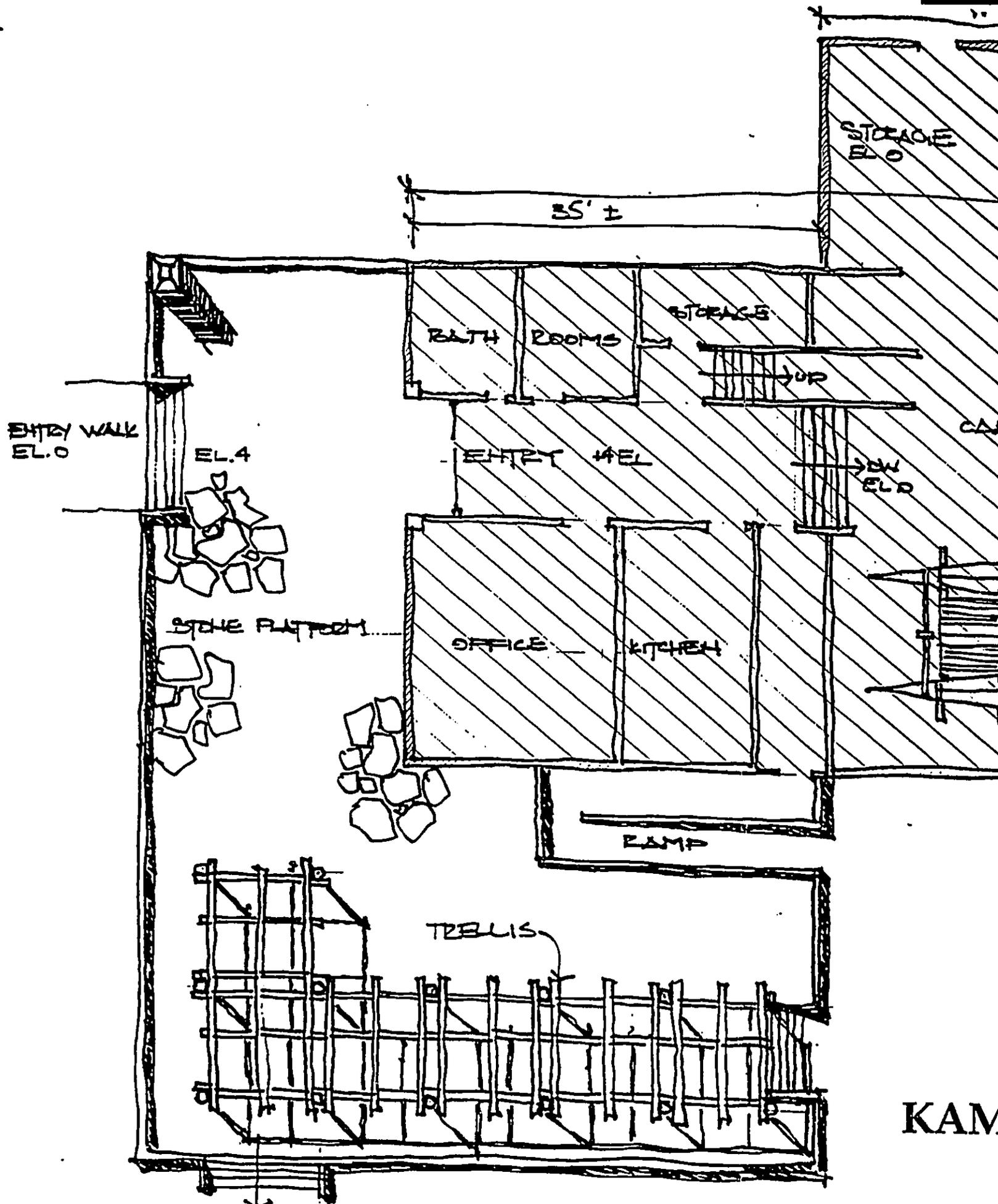


KAMEHAMEHA IKI PARK



NA'A SCALE 3/32" = 1' FIRST FLOOR PLAN

Figure 6B



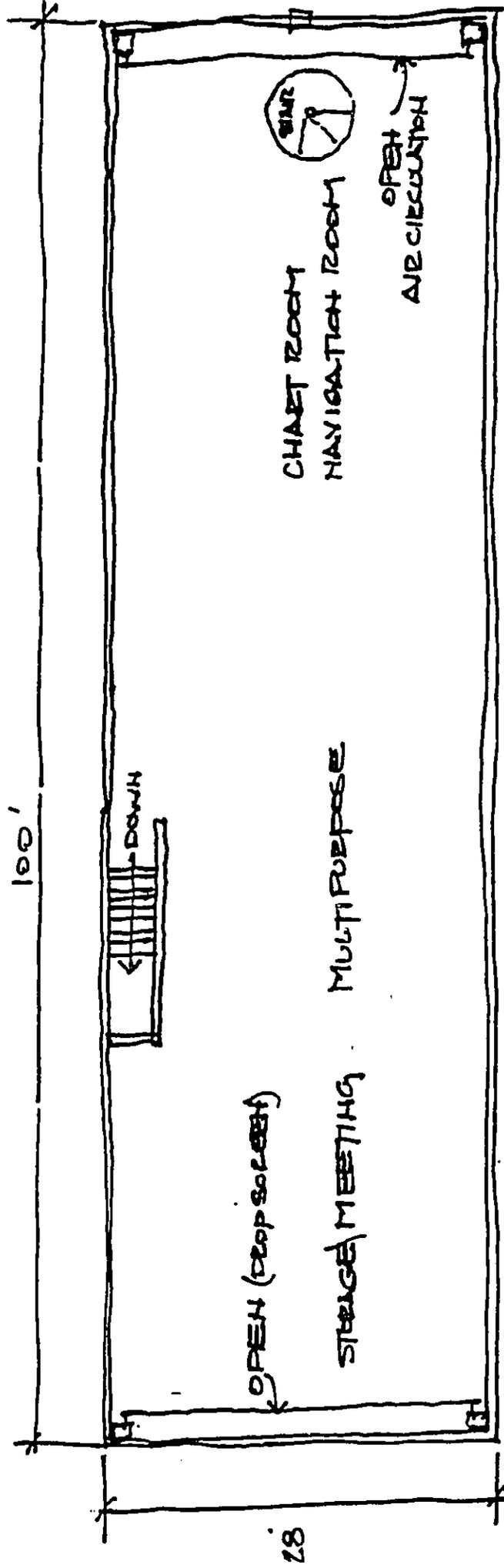
TO NAVIGATION AREA

TO STAGE EL. 2

HALE WA'A

KAM

SCALE 3/4"



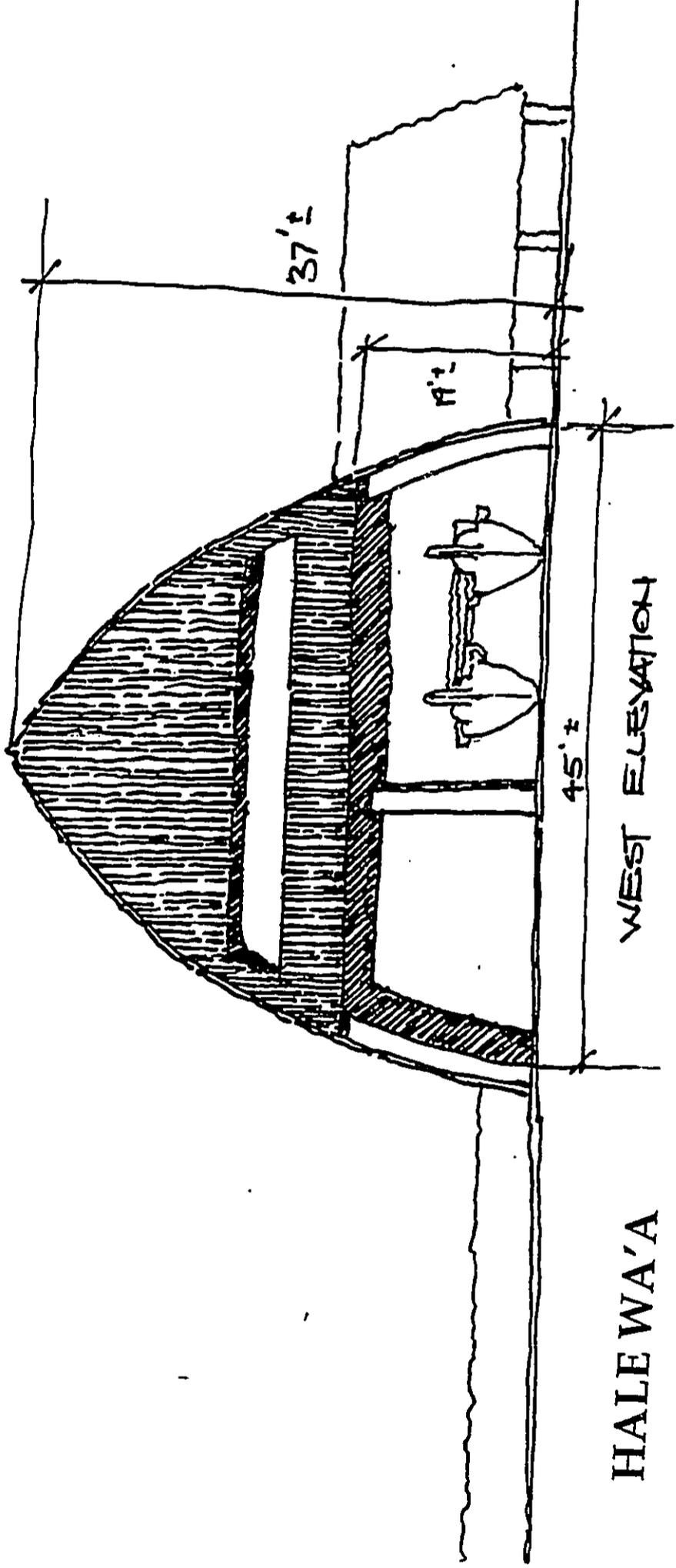
SECOND FLOOR PLAN 3/20/11

HALE WA'A

KAMEHAMEHA IKI PARK



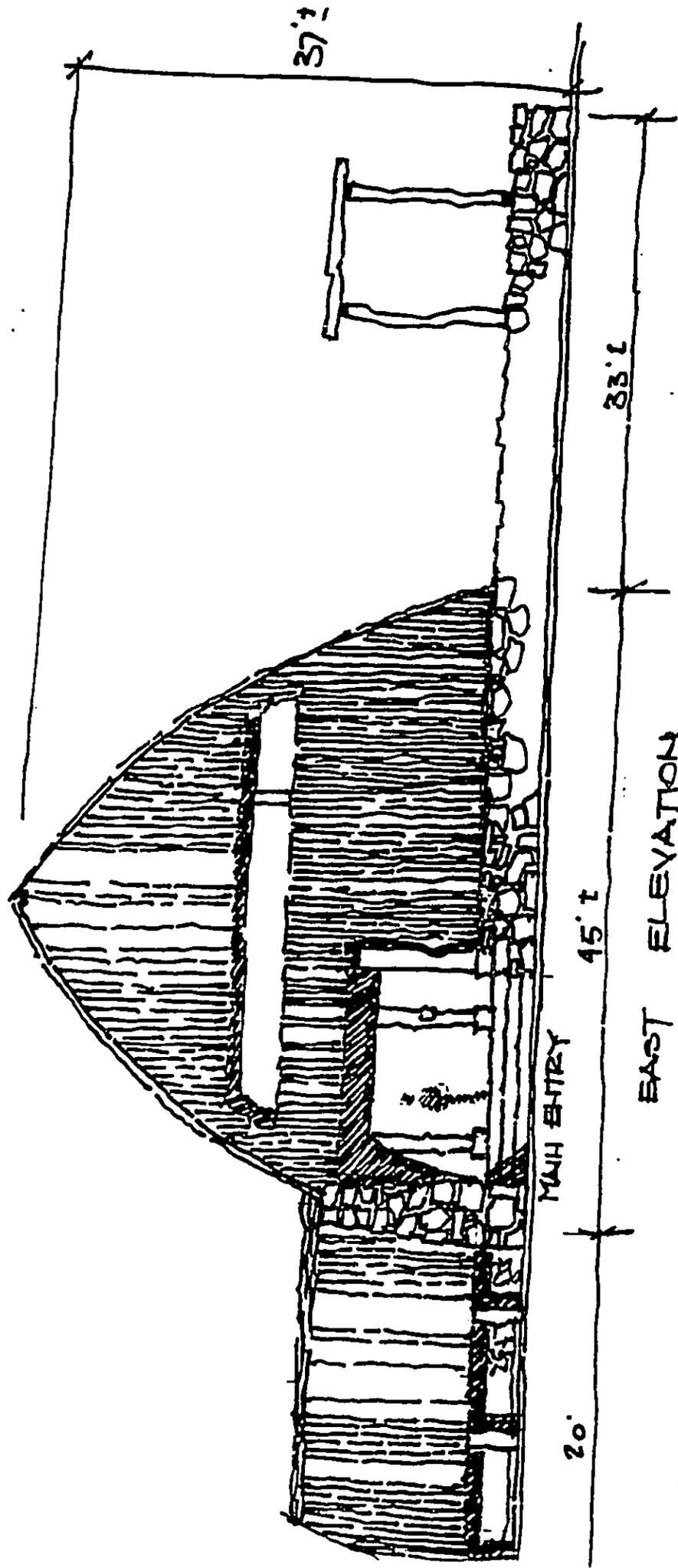
Figure 6C



KAMEHAMEHA IKI PARK



Figure 6D



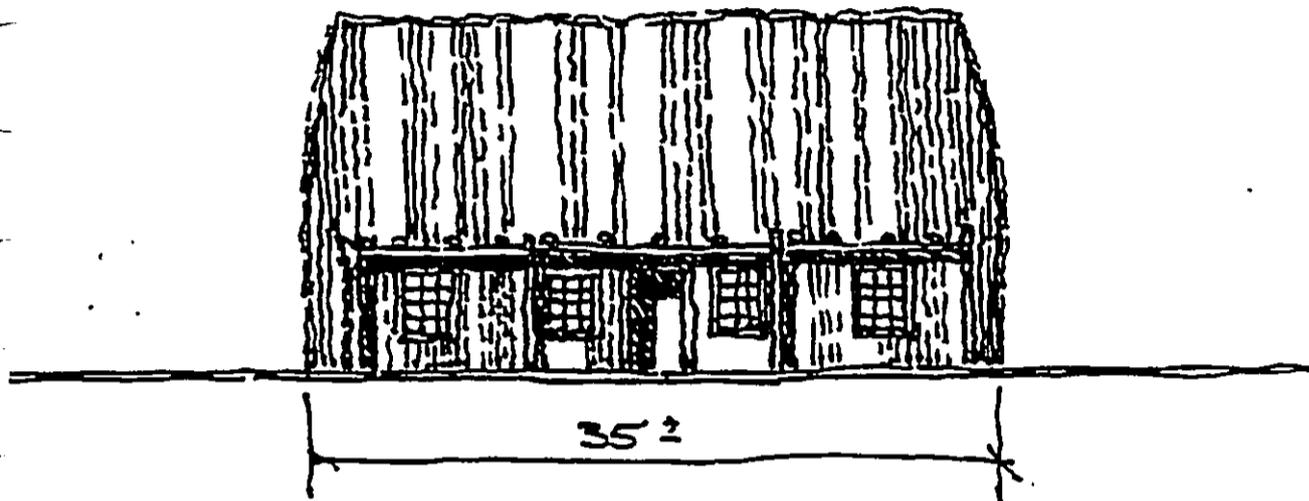
HALE WA'A

EAST ELEVATION

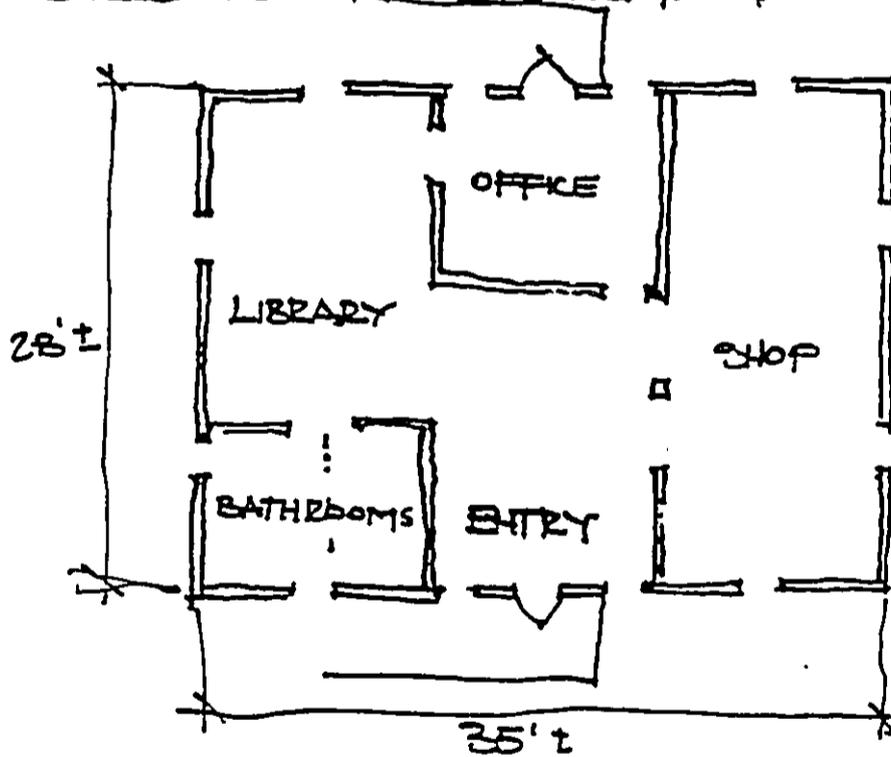
KAMEHAMEHA IKI PARK



Figure 6E



NOTE: PRINCESS NAHIENAENA'S HOME (1833) LAHAINA MAUI
 SOURCE: THE HISTORICAL RESTORATION & PRESERVATION OF LAHAINA (1966)



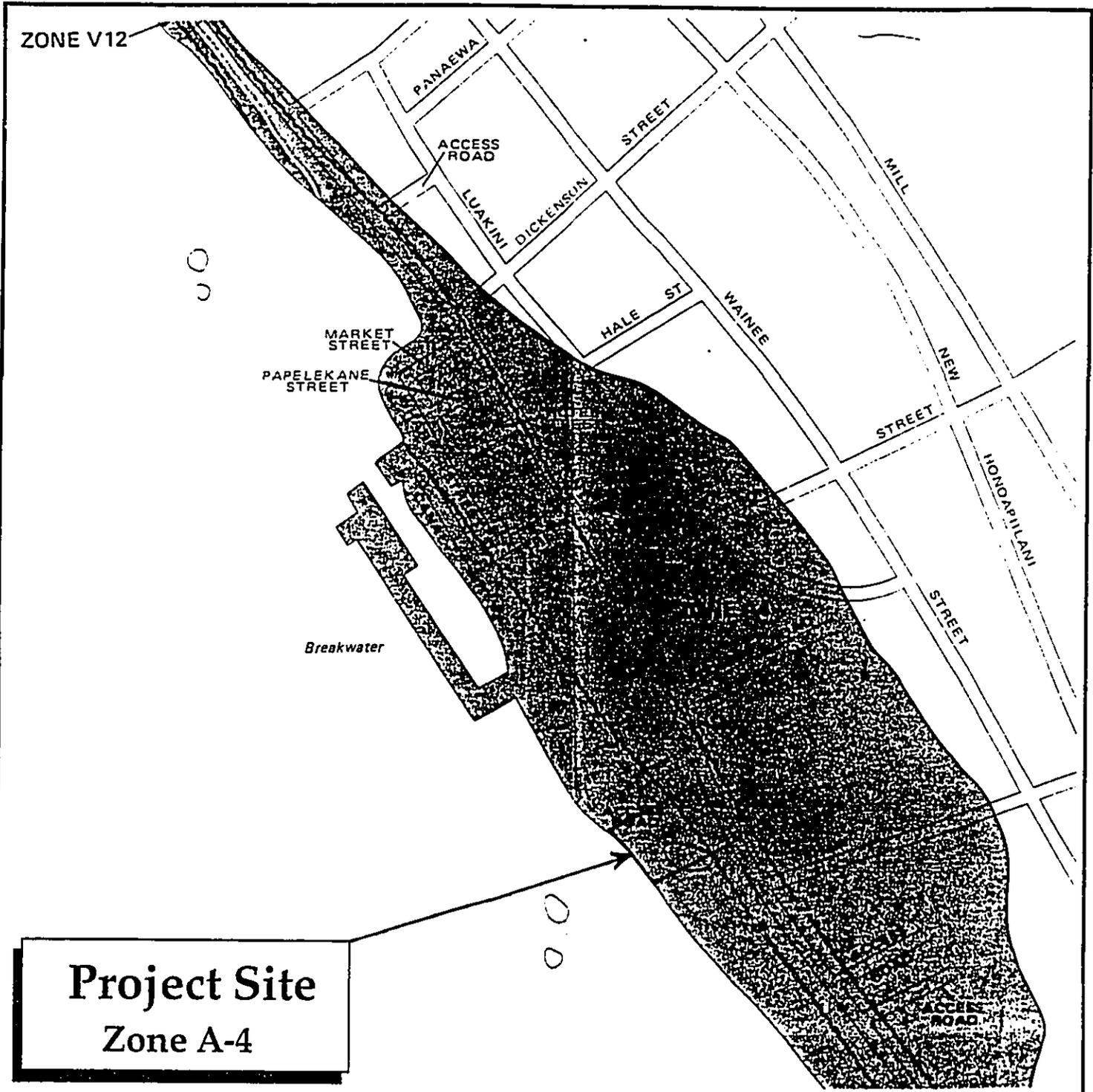
PLAN 1'x10'

EDUCATION CENTER / RESEARCH ROOM

KAMEHAMEHA IKI PARK



Figure 6F

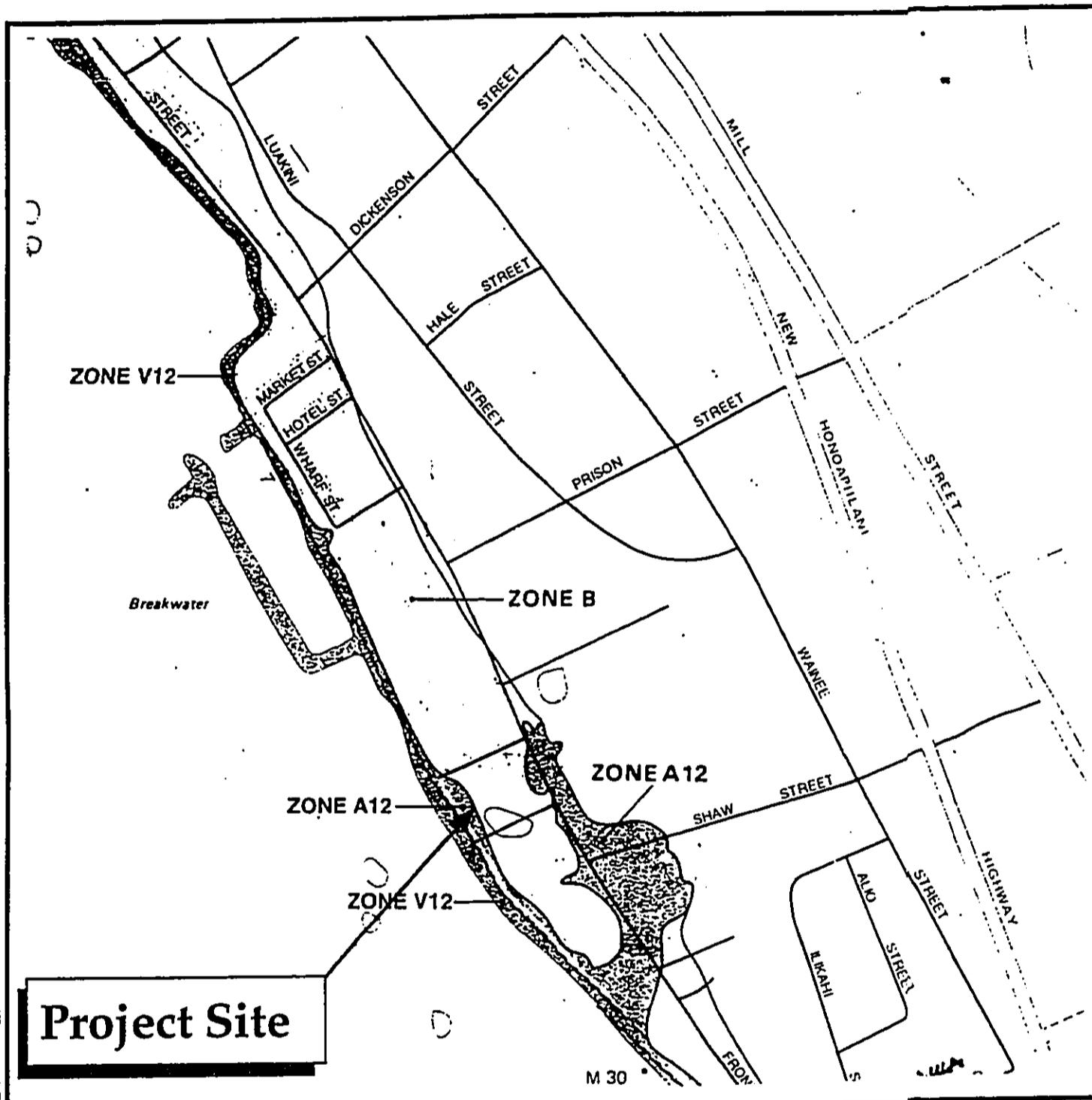


Present
 Flood Insurance Rate Map
 No. 150003-163 B
 Kamehameha Iki Park
 525 Front Street
 Lahaina, Maui, Hawai'i
 TMK 4-6-02: 10



Not to Scale

Figure No. 7



Project Site

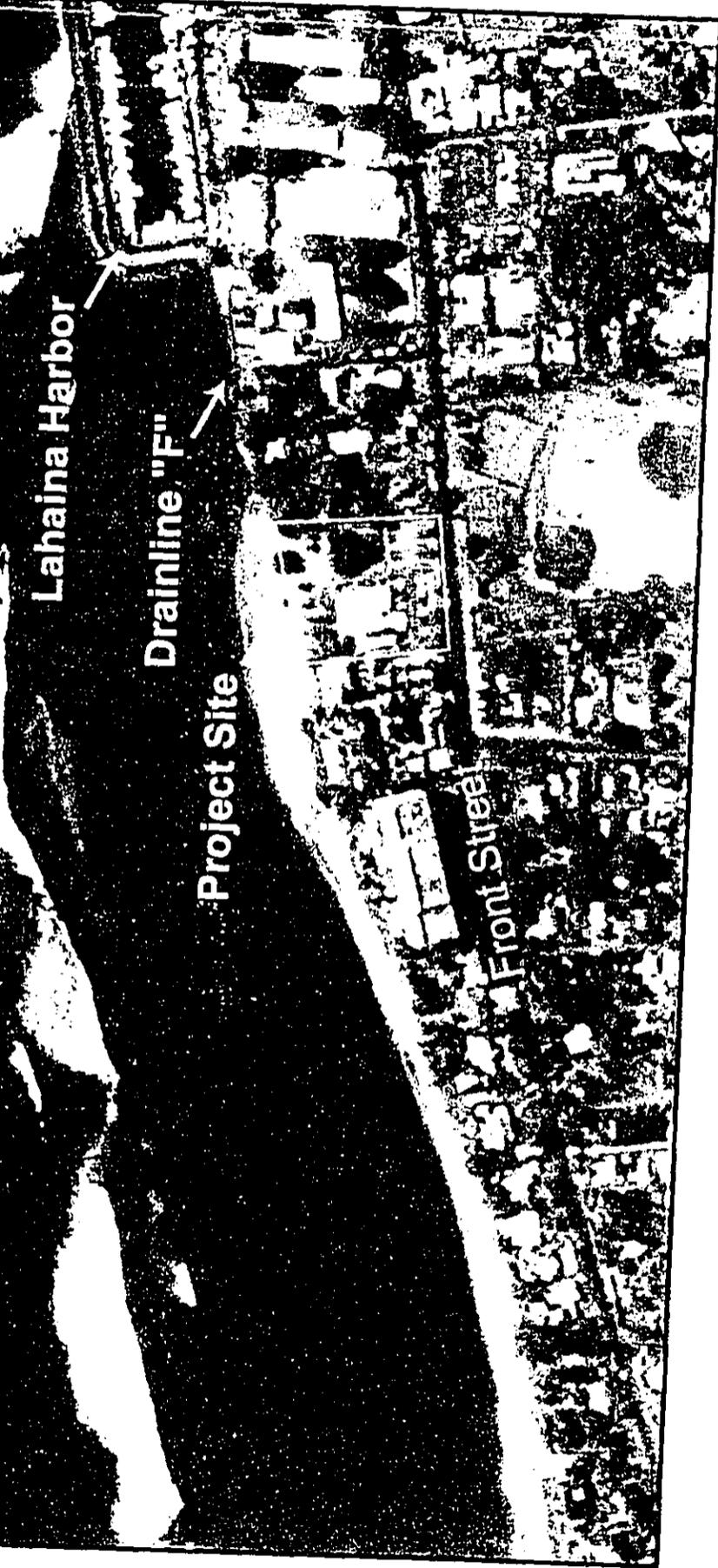


Not to Scale

**Proposed Amendment to
Flood Insurance Rate Map
No. 150003-163 B
Kamehameha Iki Park
525 Front Street
Lahaina, Maui, Hawai'i
TMK 4-6-02: 10**



Figure No. 8



Aerial Photograph (3-24-1998)

Kamehameha Iki Park

Lahaina, Maui

no scale

Figure 9



FEET
 334.10
 122.50
 TO HONOLULU HIGHWAY

TRUE NORTH
 SCALE 1" = 30'

SHORELINE MAP

LAHAINA ARMORY PARK

EXECUTIVE ORDER NO. 2771

Being a Portion of the Government (Crown) Land
 AT WAINEE, LAHAINA, MAUI, HAWAII

Owner: STATE OF HAWAII
 Lessee: COUNTY OF MAUI

NOTES:

1. ALL COORDINATE AS SHOWN REFERRED TO GOVERNMENT SURVEY TRIANGULATION STATION "LAINA" Δ

LEGEND AND ABBREVIATION:

- EA - EDGE-ON PAVEMENT
- SP - SPRINKLER HEAD
- TL - TOP BANK
- PP - POWER POLE WITH GUY WIRE
- CT - COCONUT TREE
- PT - PALM TREE
- TR - TREE (TYPE)
- SE - SPOT ELEVATION
- CO - CONTOUR

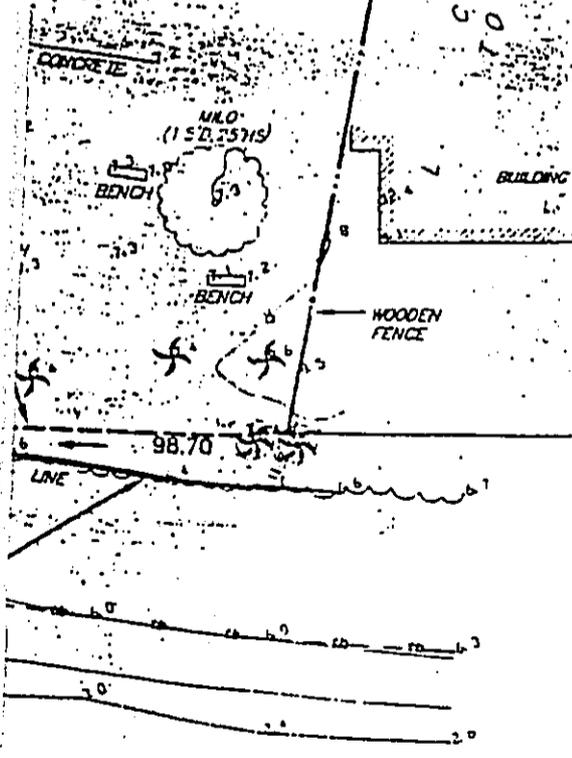
The shoreline as located and certified and delineated in red is hereby confirmed as being the actual shoreline as of JAN 28 1999

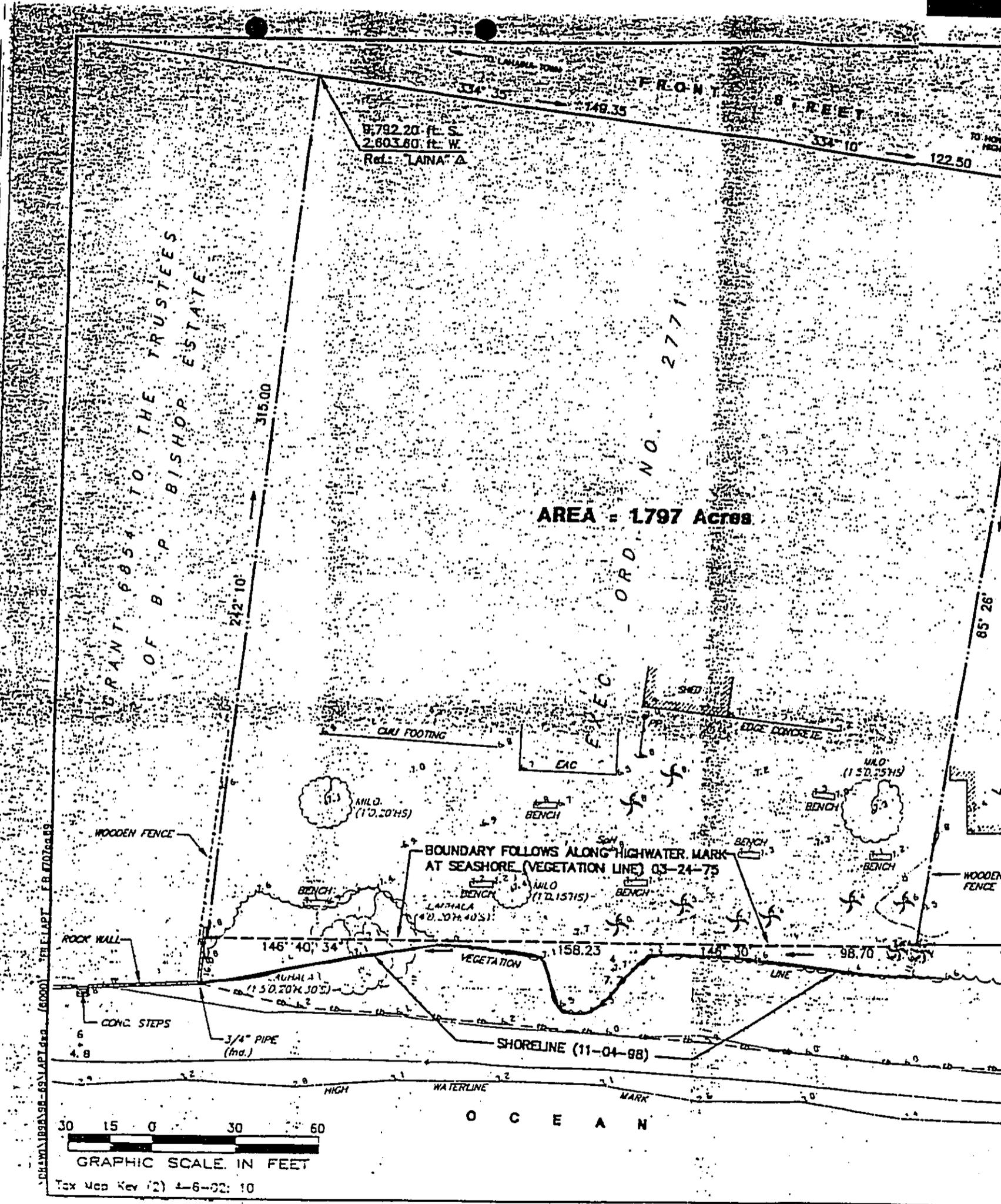
Tudley E. Ellis
 Chairman/Board of Land and Natural Resources

THIS MAP IS FROM AN ACTUAL SURVEY ON THE GROUND DONE BY ME OR UNDER MY DIRECT SUPERVISION.



Kirk T. Tanaka 11/10/98
 KIRK T. TANAKA DATE
 Licensed Professional Land Surveyor
 Certificate No. 7223





GRAPHIC SCALE IN FEET
 Tex Map Key (2) 4-6-92: 10

LINE SURVEY MAP

IA IKI PARK

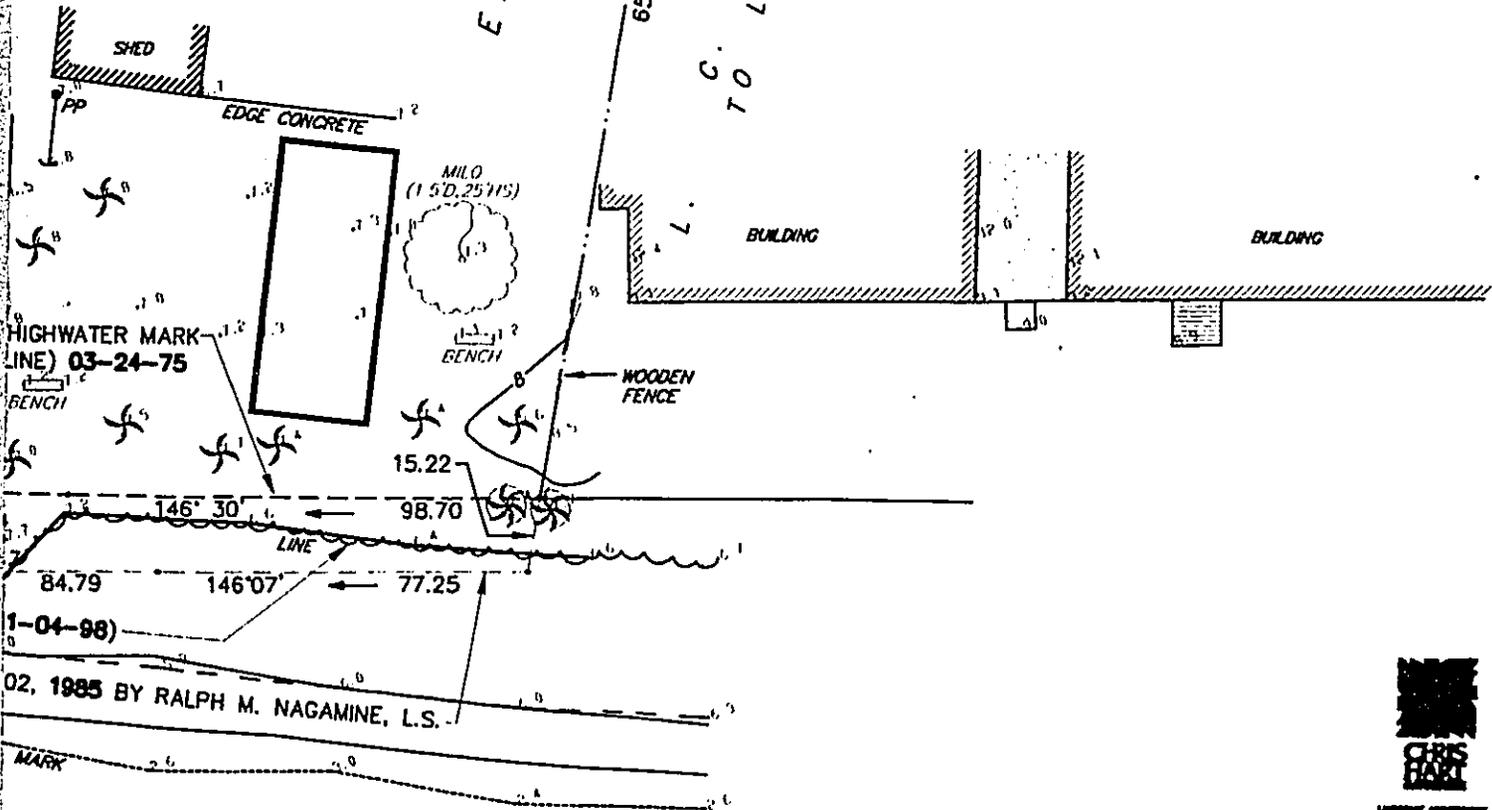
AUI, HAWAII

5 - 02 : 10

EXEC. ORD. NO. 2771
 TO L. AWARD KAMEHAMEHA 7715:3

LEGEND AND ABBREVIATIONS:

- EAC EDGE AC PAVEMENT
- SH SPRINKLER HEAD
- TOP BANK
- PP POWER POLE WITH GUY WIRE
- ☐ COCONUT TREE
- ☐ PALM TREE
- ☐ TREE (TYPE)
- 1.0 SPOT ELEVATION
- ← CONTOUR



02, 1985 BY RALPH M. NAGAMINE, L.S.



APRIL 22, 1999

SOURCE: R.T. TANAKA ENGINEERS, INC.

APPENDIX A
Archaeological Inventory Survey

REPORT ON THE ARCHAEOLOGICAL
INVENTORY SURVEY AT
HISTORIC SITE #15, LAHAINA,
MAUI, HAWAII

Prepared for:

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November, 1988

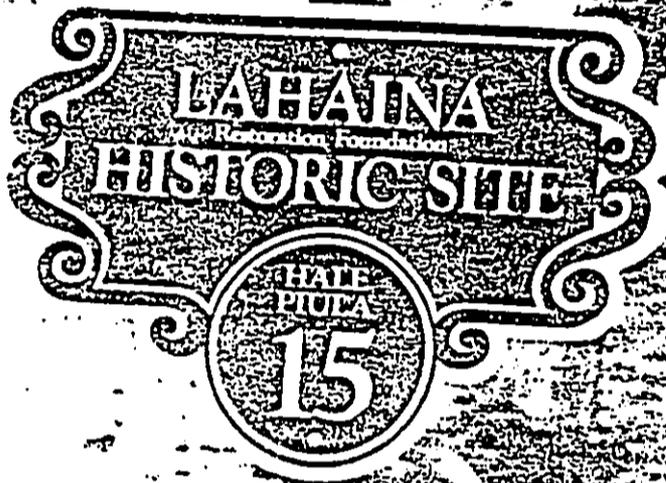


TABLE OF CONTENTS

	page
List of Maps.....	i
List of Figures.....	ii
List of Photographs.....	iii
Acknowledgements.....	1
Introduction.....	4
Site Data.....	6
Site Data: Natural History.....	7
Site Data: Historical Background Research.....	9
Site Data: Background Archaeological Research.....	15
Archaeological Field Survey.....	16
Archaeological Test Excavations.....	18
Summary and Conclusions.....	27
References and Bibliography.....	29
Maps.....	31-37
Figures.....	38-54
Photographs.....	55-71

i

LIST OF MAPS

- Map 1 Topographic Map, Lahaina Quadrangle, 1983, U.S.G.S.,
1:24,000 scale.
- Map 2 Tax Map - State of Hawaii, Zone 4, Section 2, Plat 06.
- Map 3 Map of Lahaina, 1884. Hawaiian Government Survey.
Drawn by S. E. Bishop.
- Map 4 Lahaina Historic Districts Map, Districts 1 & 2, Maui
Planning Commission, County of Maui, 1967.
- Map 5 Land Use Map of Lahaina, 1790-1960, Community Planning
Inc., Honolulu, 1961.
- Map 6 Site Map and Topographic Survey, Lahaina Park Site at
Halepiula, Wainee, Lahaina, Maui, Hawaii, 1988.
- Map 7 Plat map, Armory Building, 1932. (Courtesty, Hawaii
National Guard, Fort Ruger, Honolulu, Hawaii).

LIST OF FIGURES

- Figure 1 Test Trench #1D: Profile - Northwest Face.
- Figure 2 Test Trench #2B: Profile - Northeast Face.
- Figure 3 Test Trench #5 Series: Plan view.
- Figure 4 Feature #1: Plan view.
- Figure 5 Test Trench #5A: Profile - Southeast Face.
- Figure 6 Feature 2: Plan view.
- Figure 7 Test Trench #5H1: Profile - Southeast Face.
Plan view.
- Figure 8 Test Trench #5H1: Profile - Northeast Face.
- Figure 9 Test Trench #5F1: Profile - Northeast Face.
- Figure 10 Test Trench #5F1: Profile - Southeast Face.
- Figure 11 Test Trench #5F1: Profile - Northeast Face,
showing Feature 2.
- Figure 12 Test Trench #6: Profile - Northeast Face.
- Figure 13 Test Trench #10: Profile - North Face. Plan view.
- Figure 14 Test Trench #11: Plan view - Old Armory wall.
- Figure 15 Test Trench #12: Profile - Northwest Face.
- Figure 16 Test Trench #16: Plan view - Foundation corner of
Old Armory building.
- Figure 17 Plan view: Old Armory corner foundations and
portions of walls.

LIST OF PHOTOGRAPHS

- Photo 1 Test Trench #1: On a rainy day.
- Photo 2 Test Trench #2: Tire impression of concrete spill.
- Photo 3 Test Trench #3: "Floor pavement" possibly associated with the Napaepae residence.
- Photo 4 Test Trenches #3 and #4: Combined test excavation trenches.
- Photo 5 Test Trench #5 Series: Feature 1 at an early stage of excavation.
- Photo 6 Feature 1: Nearly completely excavated.
- Photo 7 Test Trench #5 Series: Feature 2 at an early stage of excavation.
- Photo 8 Test Trench #10: Cross-section of old Armory building foundation wall.
- Photo 9 Test Trench #11: Old Armory building, front wall of foundation.
- Photo 10 Test Trench #16: Northwest corner of old Armory.
- Photo 11 Test Trench #15: North corner of old Armory.
- Photo 12 Foundation feature of poured concrete, along Kaanapali side of old Armory building.
- Photo 13 Old Armory Building, 1929 (Courtesy, Hawaii National Guard, Fort Ruger, Honolulu).
- Photo 14 Artifacts from Feature 1 fill (left to right: bone bead, glass bead, porcelain sherd.)
- Photo 15 Test Trench #5 Series: Interested on-lookers as excavation proceeds.
- Photo 16 Test Trench #5 Series: Excavation nearly completed.
- Photo 17 Makai part of Historic Site #15, prior to excavation.

ACKNOWLEDGEMENTS .

The authors wish to express their thanks for the help and assistance given to them by a number of individuals and institutions. This project is a unique one, representing a cooperative effort between the private sector and the County of Maui in the development of a park for the children of Lahaina, Maui, Hawaii.

Our special thanks go to Ormond Kelley, AIA, who contacted us about undertaking the required archaeological inventory survey for the site. His generous help and assistance from the initial request for a proposal through the actual survey and its findings was most appreciated. His partner, Edmond Akiona was also helpful on a number of occasions, responding to our requests for maps and information.

The personal concern for this project shown by Mayor Hannibal Tavares undoubtedly smoothed the process details. Marilyn Moniz-Kahoochanohano, Director, Department of Parks and Recreation, was most helpful with the specifics of undertaking on-site excavation and the preparation of signs identifying areas of the existing park under archaeological excavation. Pat Matsui, and other members of the Parks Department staff, assisted with the

on-site security and the aforementioned signs, and their help is appreciated.

Chris Hart, Planning Director, was, as always helpful and cooperative, as were members of his staff.

Jim Luckey, Director, Lahaina Restoration Foundation, continued to offer us every assistance and access to the Foundation's archival documents. Lynne McCrory, Collections Manager for the Foundation, also aided us in our research efforts there.

Anne Griffin, Archaeologist, State of Hawaii, Historic Sites Section, gave freely of her time and help in interpreting the Historic Rules and Regulations. Ramona Ho, University of Hawaii, Maui Community College Librarian, and others on the Library staff were most helpful in providing historic reference materials.

Public Affairs Officer, Mike Sakai, and Major Jerry Matsuda, of the Engineering Division of the Hawaii National Guard at Fort Ruger, Oahu, provided background information concerning land use of the parcel by the United States Military. The 1929 photograph of the Armory Building was provided by them.

We also wish to thank Pat Hearn, Project Coordinator for the Park Donor, for her patience and understanding during the survey research project. The inclusion of historical and archaeological research work as a necessary part of the development of such a project is relatively recent, and the sometimes painstakingly slow work difficult to understand. The historical and archaeological data recovered from this effort, however, should prove its value

in future understandings of Maui's rich history.

Finally, the members of the field crew are to be thanked for their dedicated effort to this project.

INTRODUCTION

During September of 1988, Ormond Kelley, AIA, requested that we submit a proposal for an archaeological inventory survey to be performed at Lahaina Historic Site #15, presently called Armory Park and earlier Halepiula Park. The survey would be necessary for ascertaining the archaeological content of the site prior to developing a new park for the Children of Lahaina. Accordingly, we submitted our proposal for consideration, and on September 29, 1988, a letter of approval of our proposal was returned by Mr. Kelley. Background historical and archaeological research was begun shortly thereafter. On-site excavation was begun on November 1, 1988, and concluded on November 20, 1988.

The parcel's major historical importance results from it having been the location of King Kamehameha III's palace, Hale Piula or Halepiula. In addition to the palace, two fishponds are shown to have been located on this parcel (Maps 3-5). In more recent times (from 1912 to 1951), a United States Army Armory occupied the parcel, and from that time to 1975, the Hawaii National Guard occupied the existing buildings, and most recently, and Ambulance Service utilized the quonset hut and parking area. For the past decade or so, the rest of the parcel has been used as a park.

The existing quonset hut and a large, heavily built concrete slab, along with a number of asphalt roadways cover much of the land area. Additionally, concrete sidewalks and a round stone concrete wall on the mauka border, built by the WPA in 1940, cover parkland space and further attest to the variety of uses the parcel has seen over the years.

An archaeological inventory survey is initiated by undertaking historical and archaeological background research, which includes perusal of available literature and documents relevant to the particular study. This phase of the research provides the basis for a strategy for the on-site archaeological exploratory testing. Exploratory test excavations then proceed in areas of high probability of former activity, and resulting discoveries are listed in the inventory. The report on the inventory survey includes descriptions and locations of the features discovered during excavation, and serves as the guideline for mitigation requirements for the site and any proposed construction.

Some sites, such as the one discussed here, present obstructions to reasonable completion of the inventory survey. In such cases, archaeological monitoring is usually required during removal of the obstructions in order to determine what archaeological features, if any, may be discovered. Following the removal of existing obstructions, further exploratory test excavating is often required to complete the survey. At this time, the report is completed in final draft, and the

archaeological inventory survey is concluded. State and County agencies are then able to make their final recommendations for the site in question.

Because of the large paved areas on this site, much of it was unavailable for initial excavation. The work had to be conducted in two phases. Phase 1 includes preliminary background historical and archaeological research and test excavations of unpaved or otherwise unobstructed site areas. This report deals with the initial work and findings as they apply to the overall inventory survey. Phase 2 will report on the archaeological monitoring and additional test excavating which will be done following the removal of the existing pavements and other obstructions.

SITE DATA

At the time of the inventory survey, Lahaina Historic Site #15, TMK 4-6-02:10 (Maps 1 and 2), at Halepiula, Wainee, Lahaina, Maui, Hawaii, served as a public park of 1.797 acres managed by the County of Maui Parks Department. The parcel fronts on the Pacific Ocean with a beach width of 256.93 feet and a mauka, Front Street width of 271.85 feet. Its eastern (Olowalu) boundary is 280 feet, and borders the existing "505" Front Street-Lahaina

Shores Hotel complex. The western (Kaanapali) boundary is 315 feet in length and borders existing private residential property. A maximum elevation of 6 feet above mean sea level is recorded for the site.

As mentioned earlier, large paved areas, including a parking lot with 28 spaces, a quonset hut, an open, roofed-over concrete slab, asphalt roadways, concrete sidewalks, a raised performance (Hula) platform, and a children's play area, dominate the existing park. The grounds are covered by lawn which is interspersed with numerous trees. Benches for public convenience are strategically placed for use by visitors, residents and itinerants. There are no existing restroom facilities.

Natural History

The beach parcel of land is dominated by sandy, beach deposits intermixed with what are apparently typical volcanic soils brought into the area at various times in the past for purposes of filling the parcel for landscaping and leveling. The dominant flora include grasses (mainly manienie, or Bermuda grass, Capriola dactylon), Milo trees (Thespesia populnea), coconut palms (Cocos nucifera), and beach morning glory (Ipomoea pes-caprae) called pohuehue, in Hawaiian. A panex hedge encloses a yard on the makai side of the quonset hut, and two bougainvillea bushes flank the makai entrance to the same hut.

Geologically, the parcel is included in the "post-erosional lavas", with mollisols comprising the major soil types. Mollisols are well-drained, relatively young soils that develop on coral, lava, or alluvium substrates. Generally, they are relatively nutrient-rich and typical of fairly dry environments. Although no longer exposed to succession of areal flora, the rainfall/vegetation zone typical to the surrounding area is termed "kiawe, lowland shrubs", with an annual rainfall of less than 20 inches (University of Hawaii, 1983, pp. 40-41, 46-47, 70-71). Modifications of these descriptions are the result of urbanization and landscape development of the parcel over many years. The parcel shoreline is dominated by reef debris being constantly washed ashore by persistent surf. The surf in this particular area of coastline is considered to have been so good that it was known as the Royal Surfing Grounds during the monarchical period from King Kamehameha I through III. It remains a popular surfing place to the present.

The park is presently maintained by the County of Maui, Department of Parks and Recreation. An extensive irrigation system sustains the landscape flora, successfully offsetting any potential problem caused by the proximity of brackish groundwater at a depth of about 1.4 meters below surface. The disturbance to the natural condition of this parcel as a result of over a century and a half of building and landscaping is considerable.

HISTORICAL BACKGROUND RESEARCH

Land Usage

Lahaina Historical Site #15 is part of what was originally the ahupuaa of Wainee. In early Polynesian mythology, Lahaina may well have meant "unmerciful sun", after one of the discovering chiefs reportedly muttered "what an unmerciful Sun", while beginning the walk from Launiupoko to Kauaula Valley a little after noon (Notes from Harold H. Hall, about 1960, Lahaina Restoration Foundation).

The importance of Lahaina itself becomes established when, between the years of 1802 and 1819 under the rule of King Kamehameha I, it was designated as the capital of the Hawaiian Kingdom. It was here that Kamehameha I commissioned the construction of a "Brick Palace" on Lahaina Point, in order to impress Westerners with his progressive ideas. His wife, Kaahumanu refused to live in this foreign structure, and he built a traditional pili grass house for her near the brick structure (Fredericksen and Fredericksen, 1965). Upon the death of King Kamehameha I, in 1819, his son, Liholiho, became Kamehameha II when he ascended to the throne. His rule was relatively brief, ending in 1824 when the young king died while on a trip to England. Liholiho is not remembered for his achievements in terms

of political and economic events. But he is noted for his concern with and practice of what was considered at the time as "loose", "debauched", and "Godless" living. It seems that his prized possession was a sailing yacht appropriately named, "Cleopatra's Barge", a large sailing vessel which he had purchased from an American owner, and on which he practiced his life-style (Kuykendall, 1968, pp. 74 and 91).

In 1825, another of King Kamehameha I's sons, Kauikaouli, was proclaimed King Kamehameha III, and Kaahumanu (Kamehameha I's widow) was made his regent. In contrast to his predecessor, King Kamehameha III is noted for his acumen in governing, and his list of political accomplishments and changes with far reaching effects is long and impressive. His reign, between 1825 and 1854 was event-filled, ranging from the Declaration of Rights (June 7, 1839) to the Great Mahele (January 29, 1848). His death, in 1854, ushered in a new era of intense acculturation, political and economic change, culminating in the overthrow of the monarchy in 1898, when Hawaii became a United States territory.

Royal concern with the survey parcel presently under study, began in 1840, when King Kamehameha III initiated construction of his palace, Halepiula (House with the Iron Roof). A reference to the structure is found in Thrum's almanac, 1907, p. 173 (located at the Lahaina Restoration Foundation):

"There was an attempt at a building of a so-called palace which answered for a time as the show place, a name which should properly attach itself to royalty. It was also occupied part of the time by the courts of the kingdom. It was more of a curiosity

than an adornment. It seemed out of place amid all the tropical profusion and exuberance of natural life to see this building intruding into the atmosphere. With some idea of making the building larger, they undertook to double its length and made a still further blotch on the landscape. Fortunately so far as beauty was concerned it was partly dismantled and never finished and remained quite a conspicuous figure on the beach. However, in later years, they had to transport its stones to the premises of the old fort where they now appear in the government building which is much more in harmony with the surroundings."

Another reference from Bates's Sandwich Island Notes, 1654, (Lahaina Resotation Foundation) states:

"The Palace (!) is a plain, huge frame building.....It is a hundred and twenty feet long, and forty in width, exclusive of a piazza, which entirely surrounds it. It has two stories, divided off into almost any number of apartments, without the least regard to comfort or design. It was never finished, and never will be; consequently, it retains an appearance peculiarly ruinous. The best thing about it is its location, close to the ebbing and flowing of the tides, and within hearing of that never-wearying, hymns the ocean's anthem.

Yet this worthless pile, erected, too, at vast expense, was once the abode of royalty. Here, in his younger days, Kamehameha III, convoked his counselors on affairs of state and received foreign officials. But, since those days, every thing and everybody has changed. The past seems more an assemblage of shadows that have fled away forever. The large saloon in which the monarch formerly held his soirees is now employed as a circuit-court room, and very comical and absurd are some of the scenes sometimes enacted there....."

A July 25, 1846 report in the Polynesian, says:

"Lahaina contains many excellent and unoccupied houses which would find ready tenants could they be transported to Honolulu. The palace, as a huge graceless, incomplete, two-story building, encircled by a wide verandah, is called, is a monument of a waste of government means which do credit to some old and dissolute monarchy verging to its downfall. Its site is the sandy beach, instead of, as it might have been had taste been consulted, a quarter of a mile back, amid one of the many beautiful groves that give Lahaina so picturesque and appearance. Mr Baldwin's church and the adjoining house are most delightfully situated in this

respect and are quite unique in their tout ensemble, for Hawaiian scenery. The white turrets of the church peer through the trees most prettily. But this palace, on which work seems to be still going on, is on a scale to accommodate a population in itself, nearly as large as that of Lahaina. The interior is not only wretchedly arranged as to rooms, but positively mangled; special pains being manifest to prevent ventilation, and make as many ill-shaped and comfortless apartments as possible."

From childhood reminiscences of Harriet Baldwin Damon, written in 1911, following the death of her brother, Henry Perrine Baldwin, comments on the time from 1846 to 1856, reveal a bit more about the Palace (Lahaina Restoration Foundation).

"Crystal Palace - The latter possibly so called because of its numerous windows - was a large two-storied wooden structure with wide open verandas extending around both stories, situated on the southern beach - about a half mile below the present (1912) landing at one time used for offices - later as a hotel."

Judging from these comments, few were impressed with the structure. By 1848, it was being used as a court house, until it was so badly damaged by Kauaula winds in 1858, that the remaining stones and coral blocks were incorporated into the Lahaina Court House, which was under construction, and still stands in Lahaina overlooking the small boat harbor. It might be noted, that the same wind destroyed 20 other substantial buildings. Additional comment about the building and King Kamehameha III can be found in the Maui Historical Society, Lahaina Historical Guide (1964, p. 22).

After 1858, the parcel under study seems to fade in importance. There is the suggestion that no major public

buildings succeeded the palace until 1912, when President William Howard Taft, helped to provide a Congressional Grant of \$10,000.00 for construction of a military armory (Maui News, June 28, 1941). The building was substantial (Photo 13), and although no specific dimensions were located in the archives at Fort Ruger, it appears to have been about 120 feet by 60 feet (Map 7).

Also shown on this map is a smaller structure, on the Olowalu side of the property. Although not identified, it may be the residence of Joseph K. Napaepae, who staked out a Preference Right claim (C.S.F. 2684) on a portion of Lot 23, Halepiula, in 1916. He continued to live there until his death in 1946. His son, Ernest, requested to continue living on the Armory property but was denied, and instructed to remove the house from the Armory grounds. A selected piece of government land had been conveyed to the elder Napaepae by Grant 10,996, and it was to this property that the structure was to be moved. The Territory felt that it had fulfilled all obligations to the family (Letters dated April 15, 1940, and November 20, 1946, from the Office of the Commissioner of Public Lands, Fort Ruger Archives).

Following its completion in 1914, it served as the "home" of Company A, 299th Infantry, U.S. Army. After World War II, it served the Hawaiian National Guard. On January 15, 1951, a windstorm caused major damage to the building.

Repair work and rebuilding led to the "new" Armory which was completed by December 13, 1951. It was a "temporary" facility consisting of two quonset huts, one of 40 by 100 feet and a second

of about 20 by 60 feet. A large concrete slab with an elevated "lean-to" (for vehicle storage) was also included in the renewed Armory (personal research, Fort Ruger Archives).

Between 1953 and 1959, the Armory building was used by the Certificates of Hawaiian Births staff for registration purposes. The Hawaii National Guard continued to utilize the grounds and buildings as well, until May 15, 1973, when Sunao Kido (Chairman, Department of Land and Natural Resources) approved that the Lahaina Armory site be withdrawn from the Executive Orders setting it aside for the Hawaii National Guard, and that the site be set aside for County of Maui use for expansion of recreational facilities.

Executive Order No. 02770 of June 10, 1975, signed by Acting Governor Nelson Doi, finalized the cancellation of the use of the parcel by the Hawaii National Guard.

During the 1980's, the parcel became known and used as "Armory Park". Remnants of the former National Guard structures and the remaining quonset hut were used for various purposes, the quonset hut being used by the Department of Parks and Recreation at present. In 1986, plans emerged to renovate the existing facilities on the property, creating a new, and imaginative Lahaina Children's Park. Negotiations during those two years culminated in the present research effort to provide data necessary to allowing the park proposal to move forward. The land use in the future will be a public park, primarily designed for the children of Lahaina.

Background Archaeological Research

A perusal of available literature in the State Historic Sites Section archives, the Lahaina Restoration Foundation archives, and a computer search of state libraries revealed that no previous archaeological work had been undertaken at the site. Some unofficial "excavations" were reported to the authors by various informants interviewed. In particular, an "excavation" in about 1960 was performed near the southwest corner of the parcel. The informant reported that he had excavated to a depth of about 2 feet, when he encountered a fired, red brick floor and caches of medical supplies, such as glass hypodermic syringes, a monacle, a 19th century French microscope, a microscope glass slide, and numerous pieces of silverplated plates, a platter, a pitcher, and numbers of knives, forks, and spoons. The informant then described his eventual selling of the items to a "German physician" who was then visiting Lahaina in about 1960-61.

This vivid description led to our testing of the area during the current inventory survey. The results were completely negative in the areas tested. A sophisticated metal-detecting device was employed in this effort, without results. It was hoped, from the informant's descriptions, that the cultural materials remaining could be re-discovered and possibly provide data regarding the history of the parcel. However, nothing was found indicating any activity in this area of the site.

Other informants indicated former landmarks and the remnants of the "lake" (Loko Mokuhinia) expressed as a "sunken" area in the land where the present tennis courts and ballpark are located mauka of the study parcel. Most of these data were of interest, but not directly related to the survey of the site.

The present archaeological research work on this site is, therefore, the first work to officially be performed on the site.

ARCHAEOLOGICAL FIELD SURVEY

As many as 8 research personnel were involved in the survey, both in the field and in the laboratory and archival research. Because the park is a public gathering place, assistance was sought from the County of Maui, Department of Parks and Recreation, regarding security and liability during the excavation phases. Complete cooperation was given by the Department, and they provided us with signs explaining the archaeological excavation and study activity taking place, making the excavating party's task much easier than it otherwise might have been.

Principal investigators and directors of the project were Walter M. Fredericksen, MA, PhD (cand.) and Demaris L. Fredericksen, MA, PhD (cand.). The field director was Erik M. Fredericksen, MA. Additional personnel served in various capacities as field survey assistants, laboratory and archival assistants for research. The field work was performed between

November 1 and 20, 1988; background historical and archaeological research was initiated in early October.

The approach to surveying the site as indicated by the background research required the excavation of a number of initial exploratory test trenches. As mentioned in the Introduction to this report, much of the existing parcel is under pavement, limiting the locations for the tests. The initial trench was placed in the opening between the existing quonset hut and the concrete pavement to the west of it. Subsequent trenches were laid-out and excavated in the accessible areas makai of the quonset hut and concrete pavements. Additional test trenches were laid-out and excavated in the surmised perimeter areas of the old Armory building and interspersed in the landscaped areas mauka of the existing hula platform. Further tests were performed makai of the sandbox, and in the area suggested by informants. See the topographic site map (Map 6) for the locations of test trenches and test excavations.

Test excavations, auger tests, metal detector surveys, and probes were utilized during the exploratory survey in an effort to recover and record data. The entire area showed considerable disturbance as a result of the various construction projects undertaken on the parcel.

ARCHAEOLOGICAL TEST EXCAVATIONS

A total of 17 test trenches, including the extensive Test Trench 5 series were excavated and recorded. In addition, 16 exploratory trenches were also done, in an attempt to find the extent of several features. The test excavations were done in the areas not covered by structures, concrete, or asphalt. Auger tests and probes determined that the area covered by asphalt in the middle of the park extends seaward 11.5 meters, to within several meters of the high water mark. Another subsurface feature, a concrete slab was found in the area between the hula platform and the sandbox. The asphalt driveway on the northwest border of the parcel (Kaanapali side) was also determined to extend to within several meters of the highwater mark. Lastly, it appears that a sizable portion of the area makai of the sandbox has a subsurface asphalt pavement. Given these features, the size of the area which could be explored was significantly reduced.

TEST TRENCH 1

This trench, .5 meters by 6 meters, was located between the main concrete slab and the old quonset hut. It was excavated in 20 centimeter levels to a depth of about 1 meter in square D, and later taken down another .4 meters to the water level. A thick,

blackish humus layer was reached at the water level, a sample of which was collected. The profile (Figure 1) was drawn, and the different strata compared with the Munsell Soil Color Charts, and those associations recorded. The excavation gave an indication of the depth of the soil and cultural material, and a general idea of the subsurface stratigraphy which might be expected in other parts of the site. The only artifacts recovered were in the uppermost layers I and II, and consisted primarily of roofing nails for corrugated metal roofing (Figure 1; Photo 1).

TEST TRENCH 2

This trench, .5 meters by 6 meters was laid out on the makai side of the quonset hut. Only the uppermost 30 cm. showed fill activity (Figure 2). The underlying strata are undisturbed and sterile. The trench was dug to 1.4 meters in unit B, and groundwater seepage was encountered at 1.3 meters. In unit F, a layer of "spoil" concrete with a vehicle tire impression was found at about 28-34 cm. b.s. (Photo 2).

TEST TRENCH 3

This trench ran perpendicular to test trench 2, closer to the sea. It was originally 1 meter square. The upper 15 centimeters were sterile recent fill. At 20 cm. beach sand with some charcoal flecking occurred. At a depth of 26-28 cm. below the surface a possible floor was located. It consists of hard packed earth, about 3 to 4 mm. in thickness. Another meter square was extended makai, and the compact soil "floor" continued, somewhat less well

defined into that square. A sample of the compacted soil was collected to determine if there had been something mixed with it to form a kind of plaster. This feature was further followed to the northwest in another meter square, designated as square C. It appeared to be thinning out in this square, and was not further explored. The only artifact was a glass bottle stopper found in the stratum above the "floor" (Photos 3, 4). This feature may be associated with the Napaepae residence, mentioned earlier in the report.

TEST TRENCH 4

The dimensions of this trench were .5 meters by 2 meters. It was located makai of Test Trench 3. The most seaward meter, designated B, was excavated to a depth of 1.1 to 1.2 meters. It was basically a sterile test. Some charcoal flecking occurred in the sand from .3 to .5 meters b.s. The beach sand becomes more compacted at about .8 meters. In the mauka portion (A), the "flooring pavement" extended for about .3 meters at the same depth as in Test Trench 3 (Photo 4). No artifacts were recovered.

TEST TRENCH 5 SERIES

This trench series (Figure 3) was originally 8 meters by .5 meters and ran parallel to the concrete slab. It was extended as features were exposed. Located 8.5 meters makai from that structure it was divided into 8 units, A-H, A being located at the Oluwalu end. Initially, the trench was taken down in 20 cm.

levels. In unit A an alignment of stones was uncovered. It lay below a packed fill of coral and sand, which began to show up at about 20 to 25 cm. b.s (Figure 4). This feature, identified as Feature 1, was followed to seaward (Photo 5). At first it was assumed that the alignment was a straight line, but tests in strategic locations following this assumption, produced nothing relating to this feature. We then opened the unit makai (designating it A-1), and the stones excavated formed a gentle curve, revealing the feature as oblong (Photo 6).

The north side of unit A was excavated to a depth of about .9 meters, where sterile sand was found. This revealed that the stones had been placed on a reddish soil (5YR, 3/2) layer, which had a black lens on it (10 YR, 2/1). This soil layer was located along the test trench at a depth below surface of about .5 meters. It was generally about 20 cm. thick and rested on sandy soil.

A .5 meter unit (designated AA) was excavated to examine the interior fill of the feature. It was made up of coral pieces irregular in shape, ranging from 3 or 4 cm. to 10 cm. in size (Figure 5). This coral was mixed with sand, and some large samples of charcoal. One charcoal deposit was a piece of wood, ca. 4 cm. in diameter and 10 cm. long. It was removed, and preserved as a possible radiocarbon dating source.

A plaster-like deposit lay directly on what we interpret to be foundation stones. It may be the result of the burning of coral to reduce it for its lime content. A sample was taken for

future study and identification.

In units F and G, a concentration of a similar plaster-like material was uncovered at about 25-30 cm. b.s. (Photo 7). Removal of this material revealed large stones at about 40 cm. b.s. This alignment was also oblong in shape (Figure 6). In unit H, an iron pipe was found at a depth of about .5 meters b.s. (Figure 8). It runs from the concrete slab towards the beach, and makes a 45 degree angle toward Lahaina. The stone alignment continued mauka beneath the pipe (Figures 6, 7). A second course of stone had been removed when the trench for the pipe was excavated, and had been randomly tossed back in the fill. The stone alignment continued, curving back toward Olowalu in unit G3. Again the interior of this feature (designated Feature 2) was filled with coral and sand fill. In the area revealed in the profile, and excavated in the interior, charcoal was not evident in the same way it was in Feature 1.

In unit F the makai area on the outside of Feature 2 was excavated to a depth of .9 meters. An interesting detail relating to the original construction of the Feature was revealed in the profiles. The mauka profile (Figure 9) showed what looked like an intrusion extending downward from about 55 cm. to roughly 70 cm. When this profile was excavated an additional 10 cm. mauka (Figure 11), 2 courses of stones were identified resting at the bottom of an excavated pit. The construction detail showed clearly in the southeastern profile of unit F-1 (Figure 10). An excavation of

nearly 70 cm. in depth had been dug, and then the stones of Feature 2 had been placed in it. This feature varied from the construction of Feature 1, which appeared to be resting on the reddish soil layer with the black lens.

Very few artifacts were recovered. The only notable find was a piece of porcelin, on which the face of a woman is painted. The hat she is wearing suggests the styles worn at the turn of the century (Photo 14). Further research may give a more exact date. It was found in unit A-1, at a depth of about 30 cm., in the plaster-like fill which covered the stone alignment in Feature 1.

TEST TRENCH 6

This exploratory pit was 1 meter square. It was dug in an effort to determine the extent of Feature 1. It was completely sterile however. The profile is recorded in Figure 12.

TEST TRENCHES 7 and 8

These exploratory tests were done to determine the depth of concrete slab, and to ascertain how far seaward disturbance from its construction extended. Spill from pouring of the concrete slab was found at 5 to 7 cm. b.s. in Test Trench 7, which was adjacent to the slab. Further excavation was not possible. Test 8, 2 meters makai of the slab was another sterile pit, and was excavated only to a depth of 70 cm. Disturbance from the construction of the concrete slab did not extend to the area of

this excavation.

TEST TRENCH 9

This trench, .5 meters by 2 meters, was excavated 1 meter makai of the exposed edge of the asphalt pavement located in the middle of the site. At a depth of 15 cm., further excavation was prevented by a layer of asphalt. Another test was excavated 10 meters from the edge of the asphalt, and again asphalt was found at about 20 cm. b.s. Auger tests indicated that this pavement extended another 1.5 meters (11.5 meters from edge).

TEST TRENCH 10

This trench, .5 by 3 meters, was located in the area on which the old Armory building once stood. A substantial concrete wall of ca. 30 cm. width was discovered at a depth of 20 cm. b.s. (Figure 13; Photo 8). The trench on the mauka side of the wall was excavated to a depth of 90 cm. b.s. The bottom of the footing of the wall rested on sand and coral fill at a depth of 80 cm. It appears that the layers of reddish soil and stained sand had been deposited after the wall was constructed. This wall was interpreted to be part of the foundation of the old armory building (Map 7).

TEST TRENCH 11

The original trench was .5 by 3 meters, and was extended to follow a poured concrete wall feature which was encountered at 15-18 cm. b.s. (Figure 14; Photo 9). The wall in this front part

of the building had a dressed stone facade 20 cm. thick. The wall itself was 40 cm. in width in this section. The area inside the wall was not excavated. The trench outside the wall was excavated to a depth of 40-45 cm. b.s. This revealed a fill which consisted of waterworn rocks ranging from 15 to 25 cm. in diameter, and sandy soil.

TEST TRENCH 12

This trench was .5 by 3 meters, located 15 meters from the WPA wall along the Front Street portion of the property, and 1 meter in from the asphalt road running along the Kaanapali border of the parcel. The makai part of the trench was excavated to a depth of 1.25 meters. At a depth of 70 cm. a layer of compact coral and pebble fill, which covered a concentration of large stones, ranging in size from 20 to 40 cm. in diameter, which might represent an architectural feature, was found (Figure 15). Because of the depth of this possible feature, and its proximity to the concrete curb and asphalt road, it was not possible to explore westward. Test Trench 17 was an easterly extension to follow this possible feature. Although the upper strata were similar, no sign of the possible architectural feature was found. See later discussion of Test Trench 17.

TEST TRENCHES 13,14,15,16

This series of test explorations was made to determine if the corners of the old Armory building could be found. In each case

corners were found. The distance between the features in Test Trenches 13 and 15 was 60 feet (18.3 meters), which was the width of the old Armory Building (Figure 17). However, the distance between Test Trenches 13 and 14, and 15 and 16, was only 20 feet (6.1 meters.). According to a National Guard map (Map 7), the size of the building appears to be about 120 feet long, much larger than these corners would indicate. On the Kaanapali side, another foundation feature was found at 13 cm. b.s. (Photo 12). It was a poured concrete block 24 inches (65.5 cm.) square, 30 feet (9.15 meters) from the corner in Test Trench 16. Corners of the foundation at the makai end of the structure were not found, as the area in which they would have occurred has been extensively disturbed by the construction of the sandbox.

Several tests were made along the Kaanapali edge, at 30 foot (9.15 meters) intervals. At a depth of 10 to 15 cm., a curbing, 10 cm. in width, which was associated with a more recent concrete slab, extending Olowalu toward the Banyan tree, was located. It continued all the way to the sandbox, where it had been broken through when that structure was built. Another slab was poured at a depth of 45 cm. b.s., and then covered with sand, to form the play area. Due to the shortage of time, it was not determined how far it extended toward the interior of the park.

Several test excavations were also made along what would have been the Olowalu side of the old Armory building, but no footings or other structural foundation features were found.

The whole area surrounding the old Armory building had been

filled in with waterworn stones from 10 to 20 cm. in diameter and sand. The interior portions of the structure which were excavated were composed of sandy fill.

Figure 16 and Photo 10 show the details of the northwest corner of the building, and Photo 11 shows the northern corner.

TEST TRENCH 17

This trench was an extension of Test Trench 12, .5 by 3 meters. The uppermost strata were composed of sandy fill which contained many waterworn stones up to 10 cm. in diameter, with quantities of pebbles intermixed. Beneath this was a sand layer, which gradually changed into a brownish-clay layer at about a meter in depth. The trench was excavated another 30 cm. until the clay became very moist. A sample of this clay was taken at 1.23 cm. b.s. Several old maps indicate that there was a fish pond in the general area of this test trench, and the clayey soil would be consistent with that kind of a feature.

SUMMARY AND CONCLUSIONS

The exploratory excavations did not reveal any structural features which can definitely be determined to be associated with Hale Piula. The two oblong structures uncovered in Test Trench 5 Series are not fully understood at this point. Carbon samples were collected, and can be used to establish radiocarbon dates.

When the existing concrete slabs and asphalt are removed, a large section of the parcel will be opened up for archaeological exploration, and portions of the foundations may be uncovered.

Since the historical maps which indicate the location of Hale Piula are far from precise (because they lack identifiable landmarks), the exact positioning of the building on the parcel was not known prior to the archaeological inventory excavations. It is hoped that if Hale Piula is located under the concrete slabs, the foundation has not been obliterated, so that its exact location can be established.

A portion of the foundation of the other significant historical structure located on this parcel, the old Armory building, was located. At the makai side of the site, however, more recent construction activity has probably destroyed the rest of the foundation.

The paucity of artifacts was somewhat puzzling, considering the amount of activity that has taken place on the site.

Because over half of the area of the survey parcel is under pavement or asphalt, and unavailable for exploration, it is recommended that during the process of removal of these paved areas, archaeological monitoring be carried out. In order to effect this removal, the site will be considerably disturbed to depths of 40 cm. or more. Undisturbed features found during the inventory excavations occurred at depths of about 30 cm. and extended to 70 cm. b.s. Therefore, if there are as yet undisturbed features under the pavements, there is high likelihood that they can be discovered during the monitoring process. At that time further archaeological test excavations may be warranted in order to complete the survey and data recovery.

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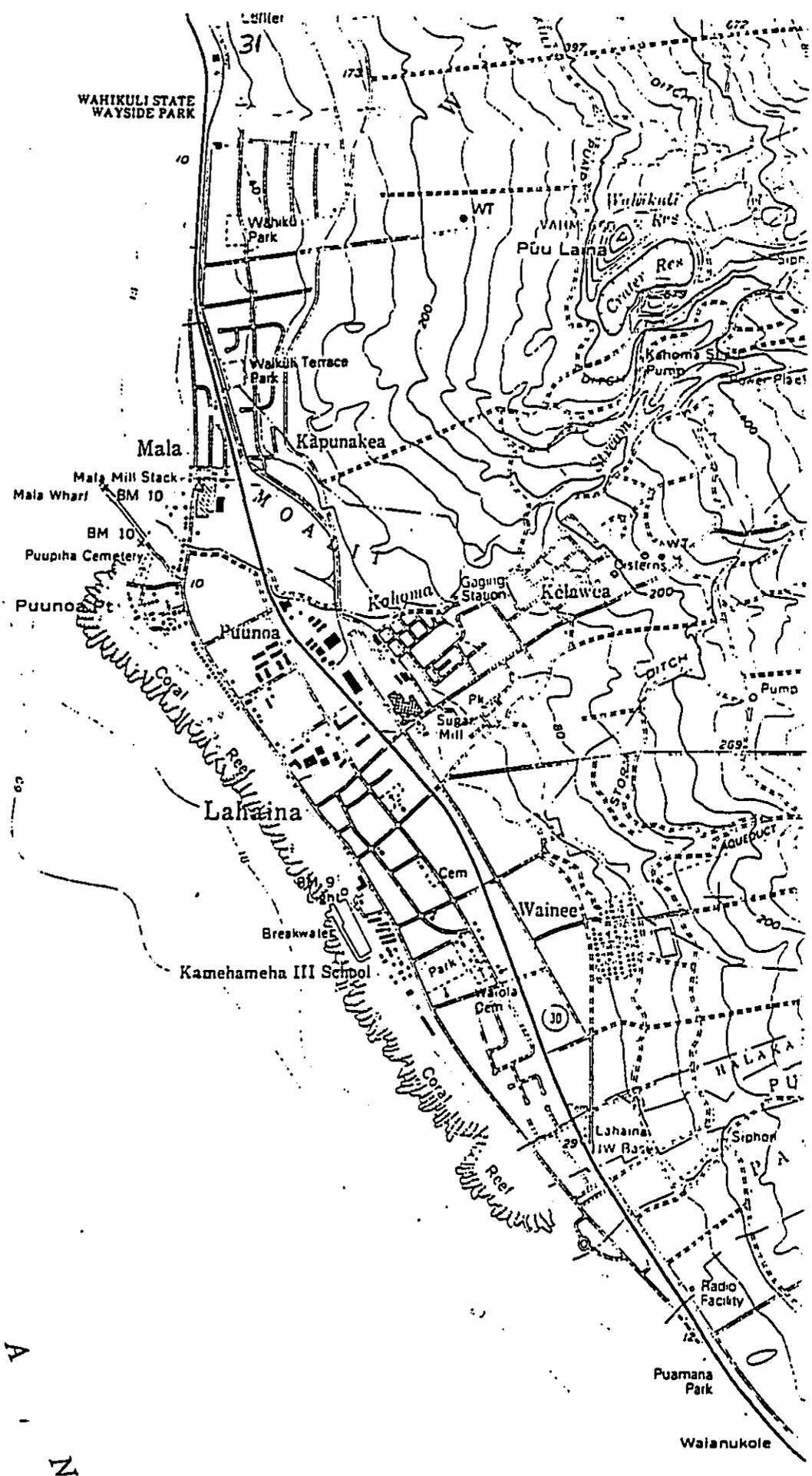
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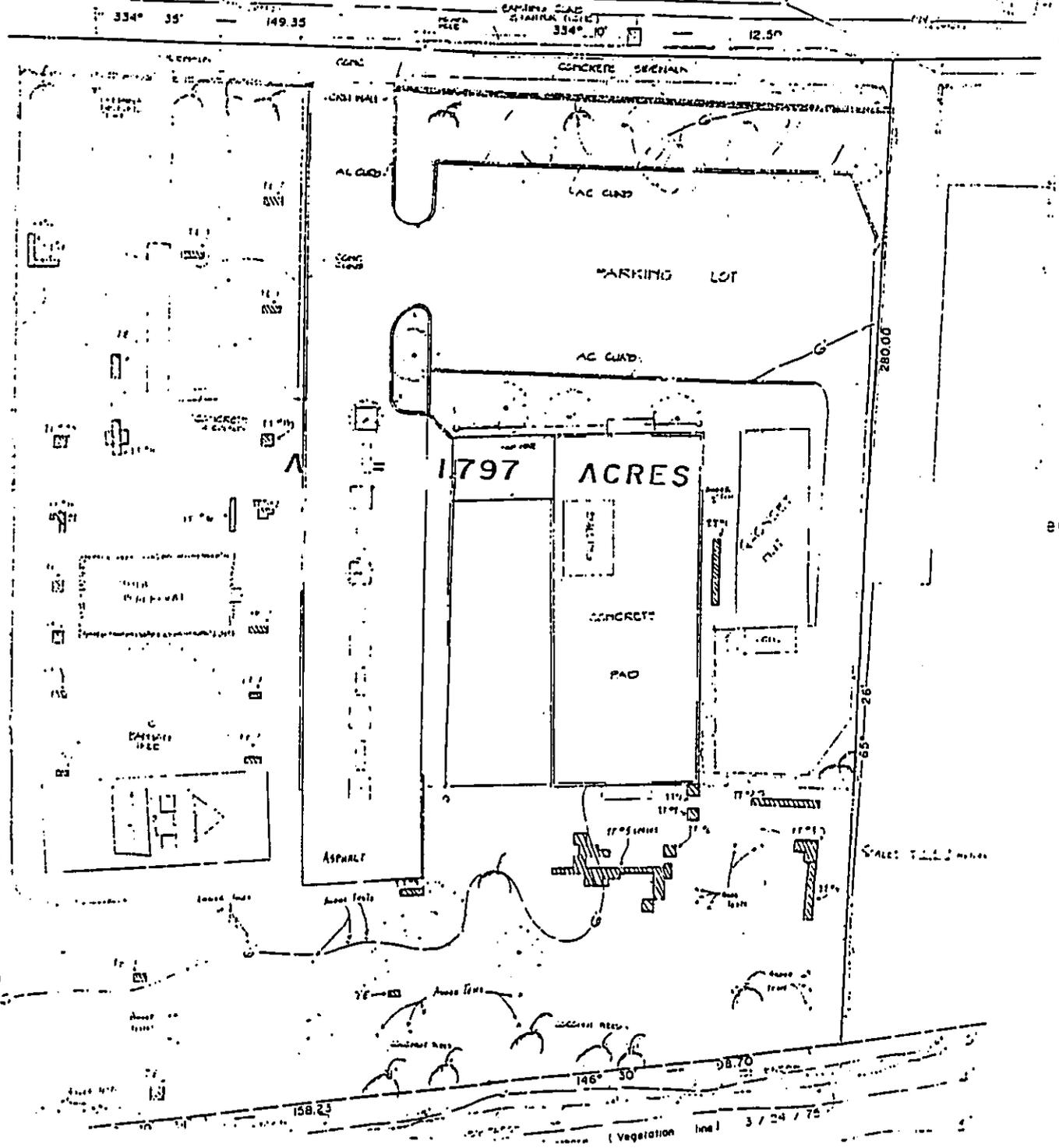
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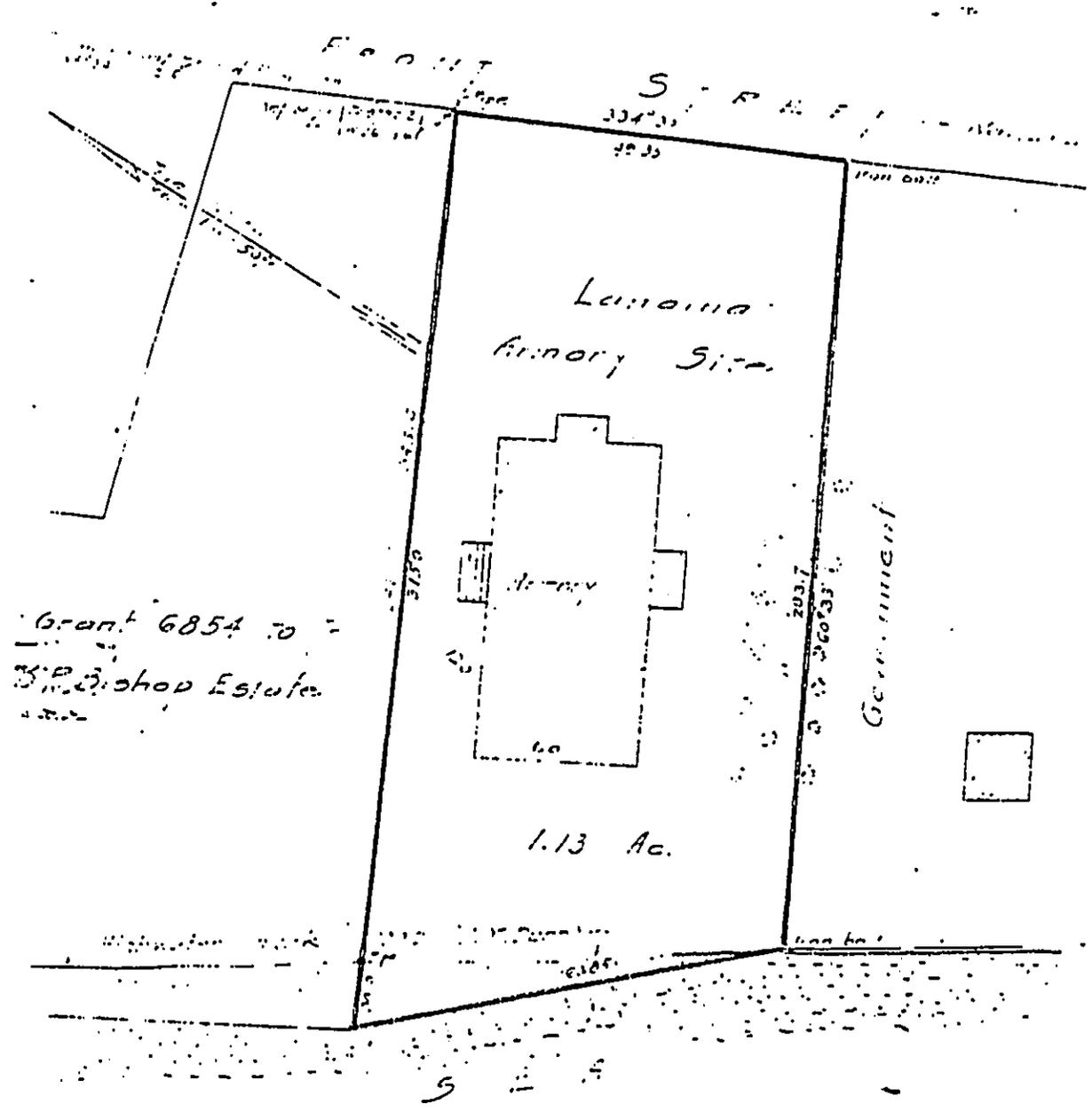
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Map 1

FRONT STREET





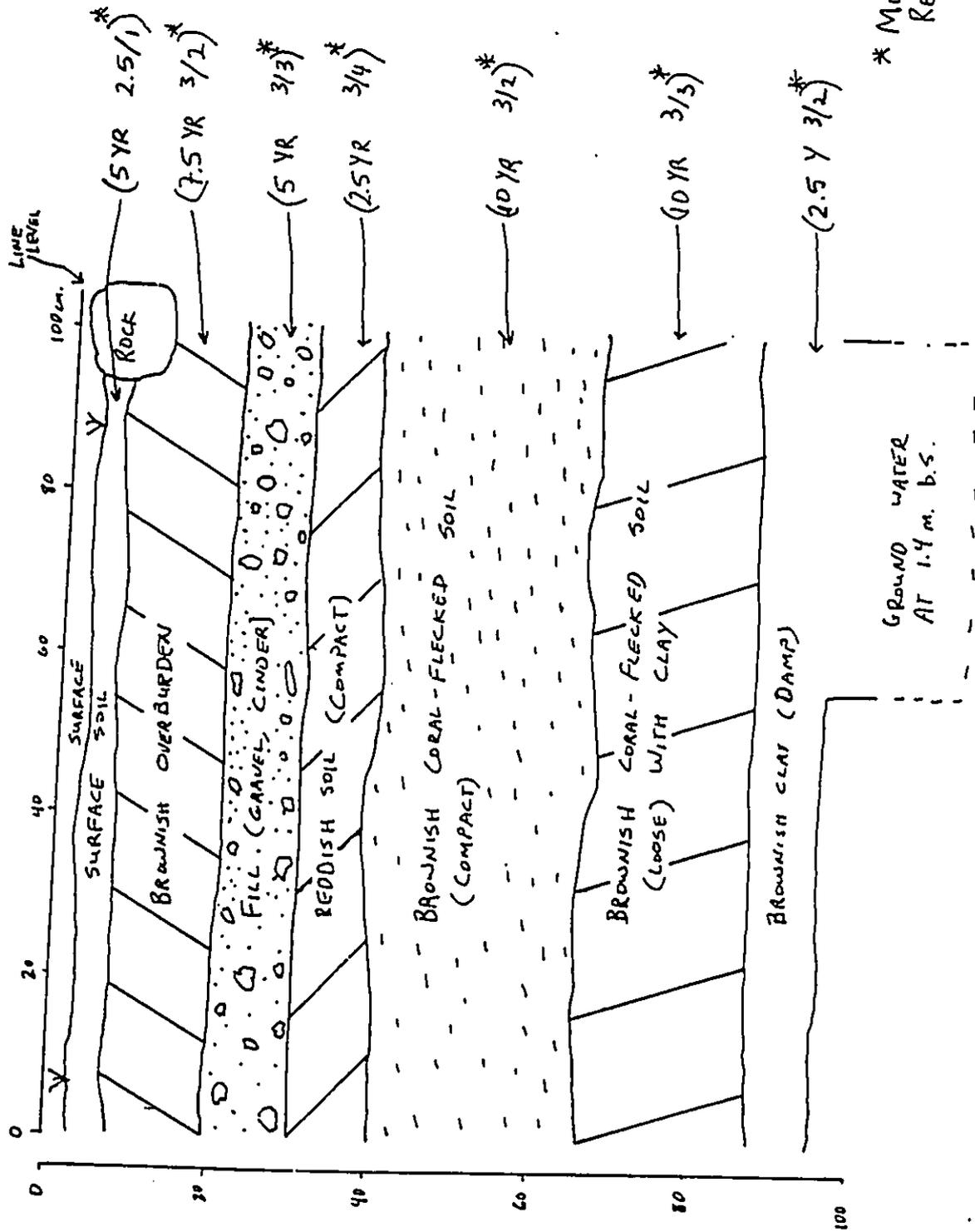
EXECUTIVE ORDER NO. 191

Lanaina Armory Site
 for National Guard of Hawaii
 Front Street,
 Lanaina, Maui
 Scale in = 30ft
 62046 3-18-25

Note: Sketch plan
 Revised 12-28-22
 C.S.F. 4256

T.I. #1D PROFILE: NORTH WEST FACE

2 Nov. '88



* MUNSELL COLOR READING

FIGURE 1

T.T. 42B PROFILE: NORTH EAST FACE 7 Nov. '88

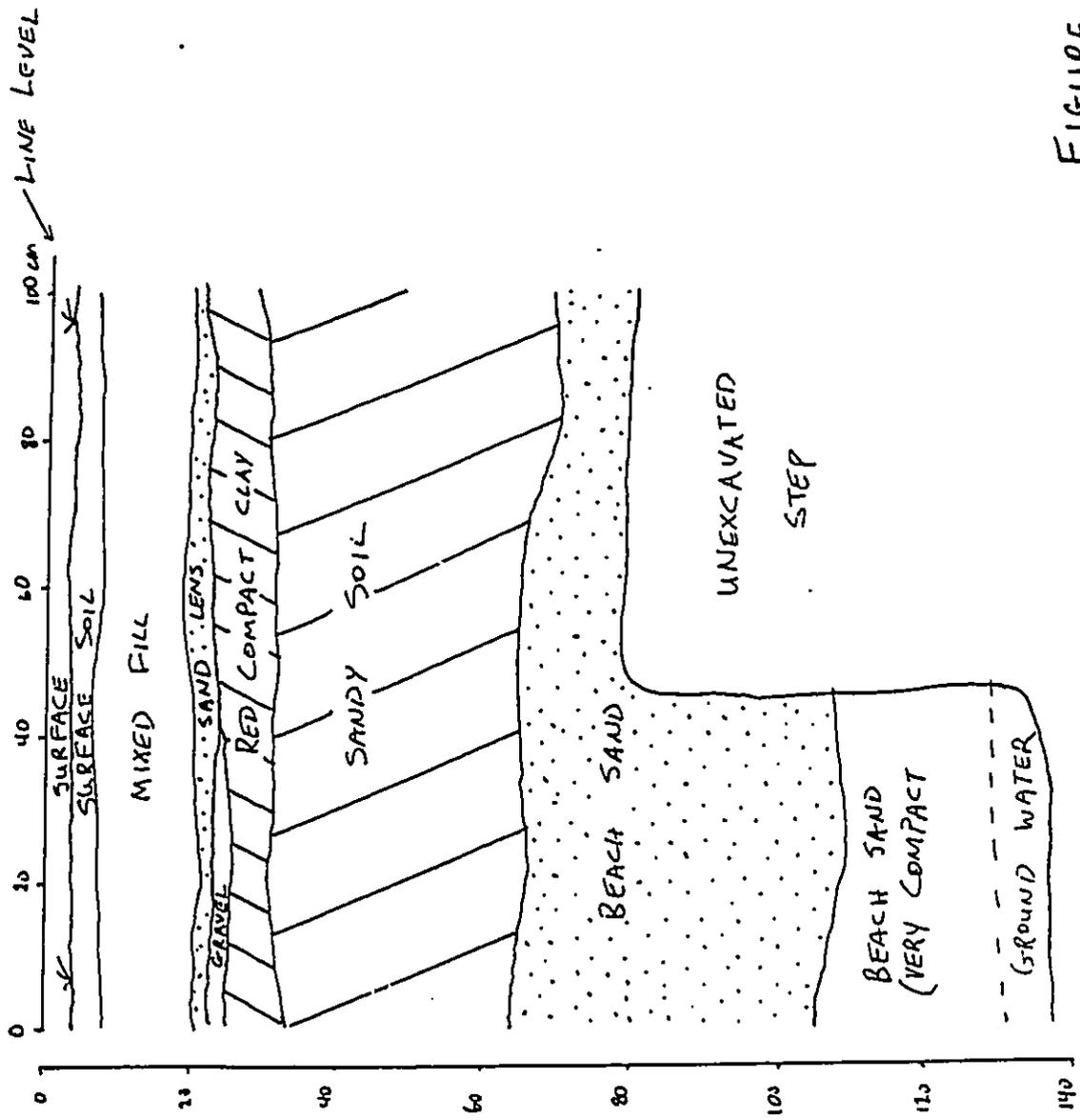
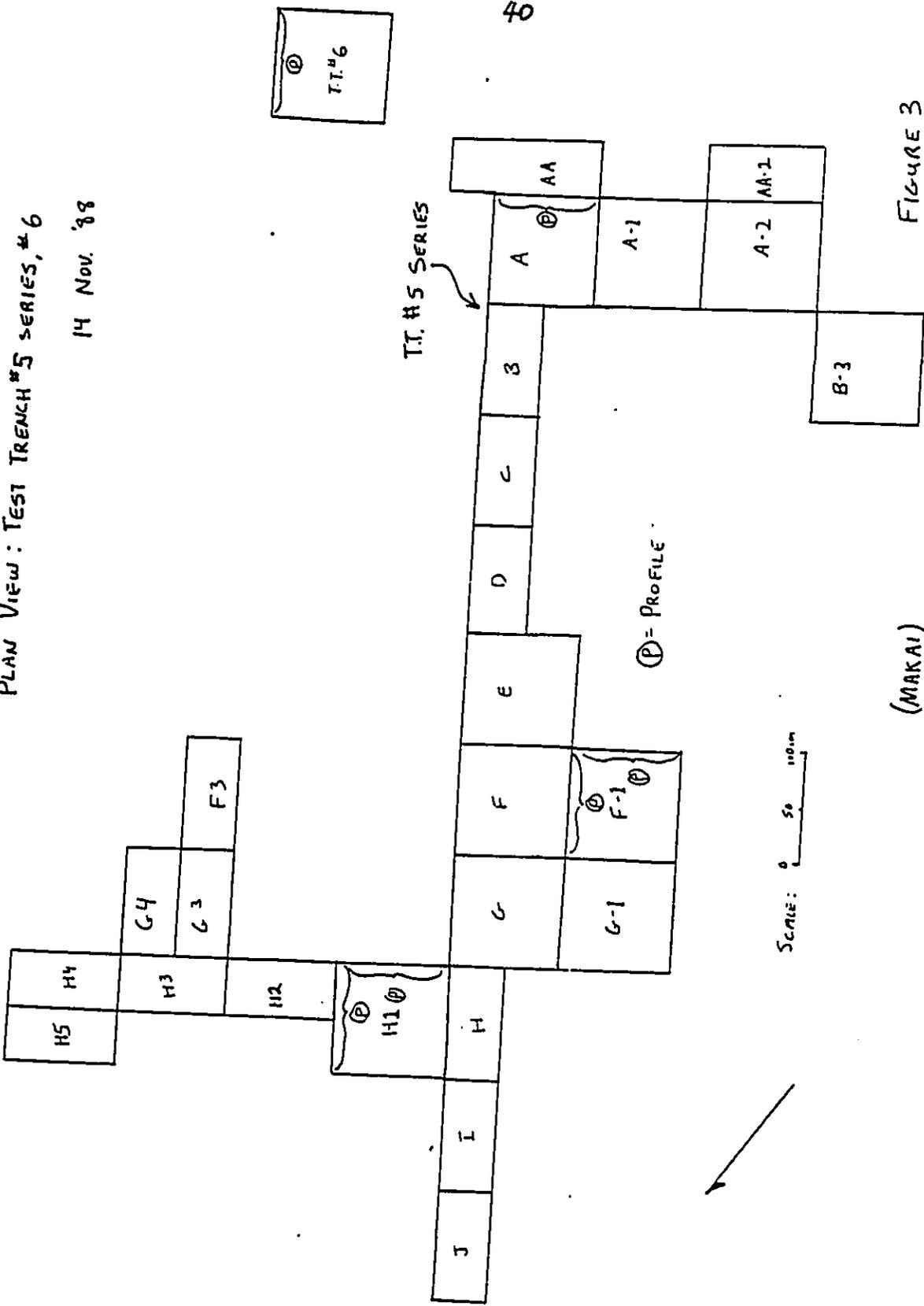


FIGURE 2

(MAUKA)

PLAN VIEW: TEST TRENCH #5 SERIES, #6

14 Nov. '88



T.T. #5 SERIES

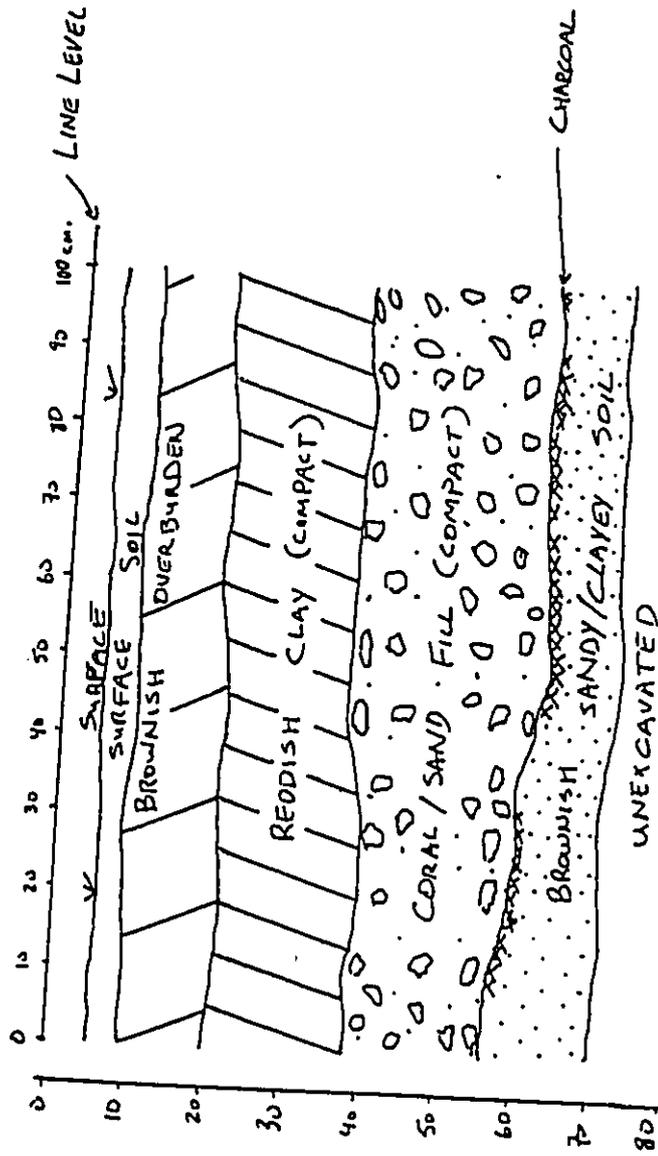
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(MAKAI)

FIGURE 3

T.T. # 5A PROFILE: SOUTH EAST FACE 9 NOV. '88



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FIGURE 5

15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

T.T. #5H1 PROFILE: NORTH EAST FACE
15 Nov. '88
(NOTE INTRUSIVE TRENCH FILL)

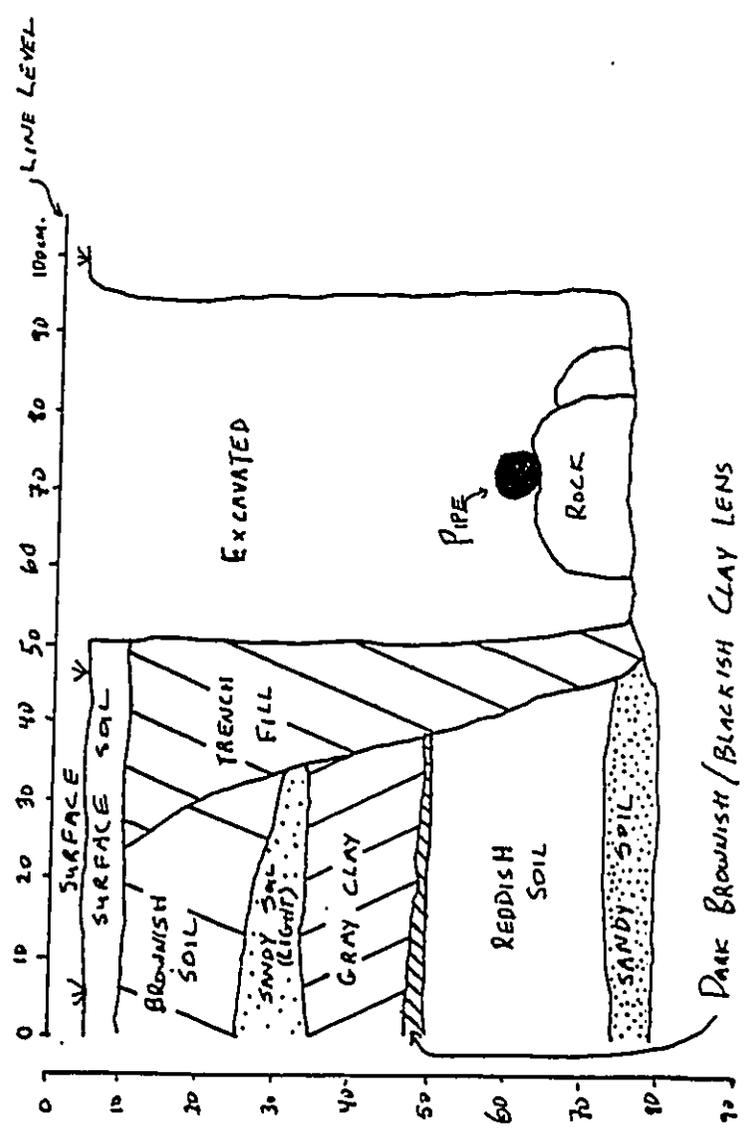


FIGURE 8

T.T. # 5F-1 PROFILE: NORTH EAST FACE (MAUKA) 9 NOV. '88

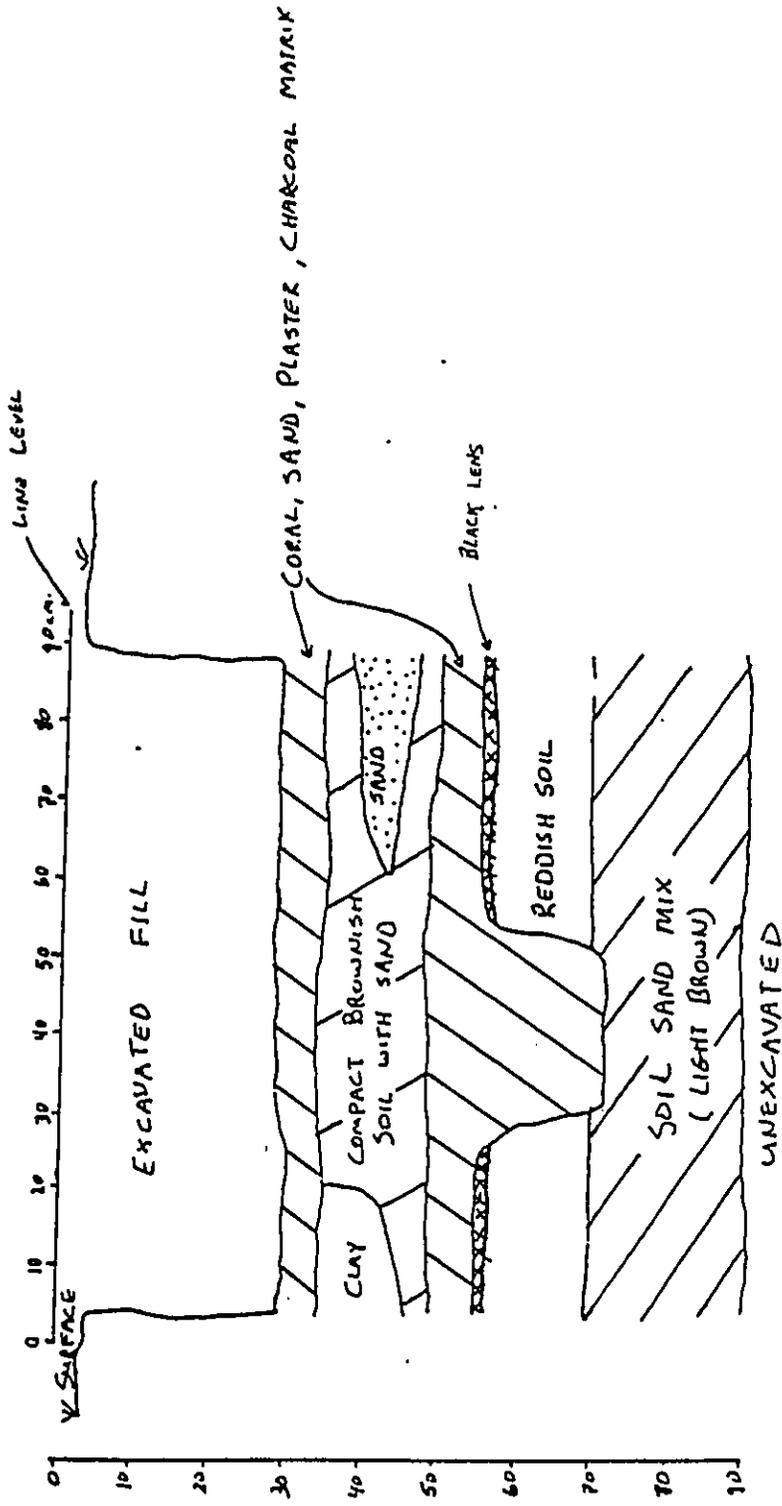
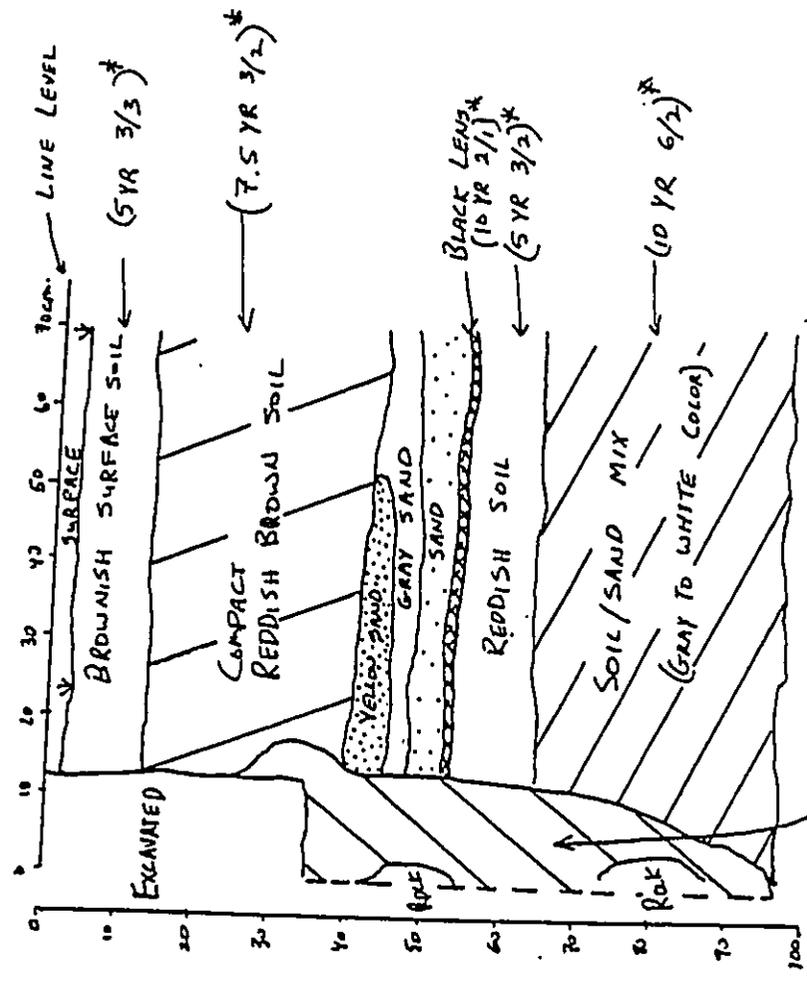


FIGURE 9

10 20 30 40 50 60 70 80 90 100

T.T. # 5F-1 PROFILE: SOUTH EAST FACE 15 Nov. '88

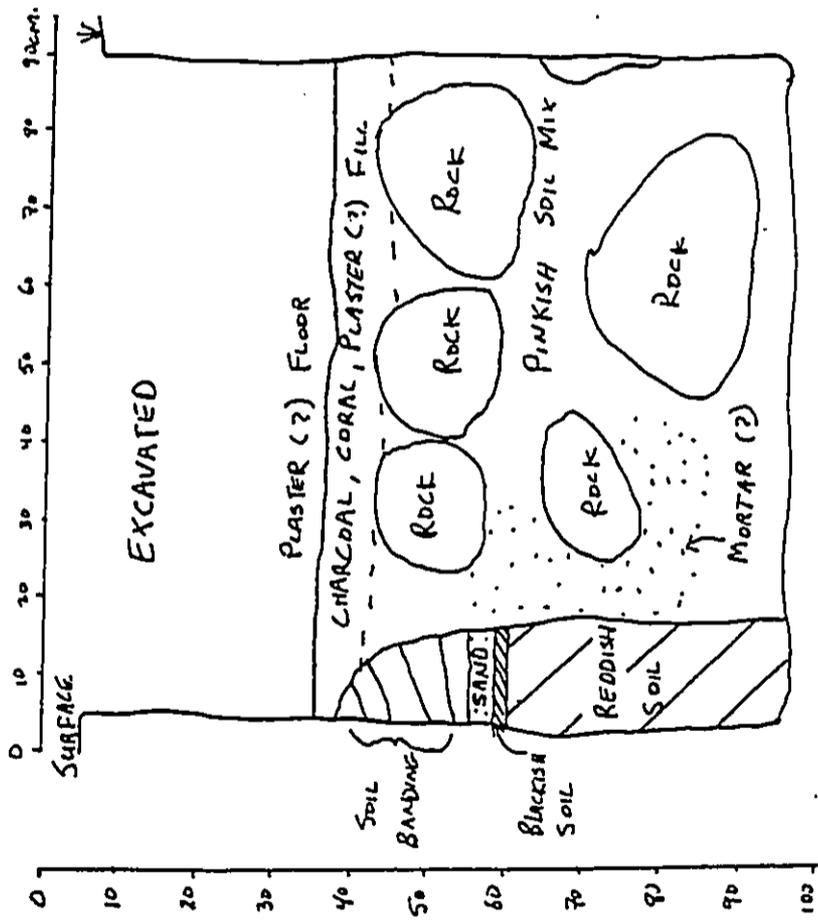


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* MUNSELL COLOR READINGS

FIGURE 10

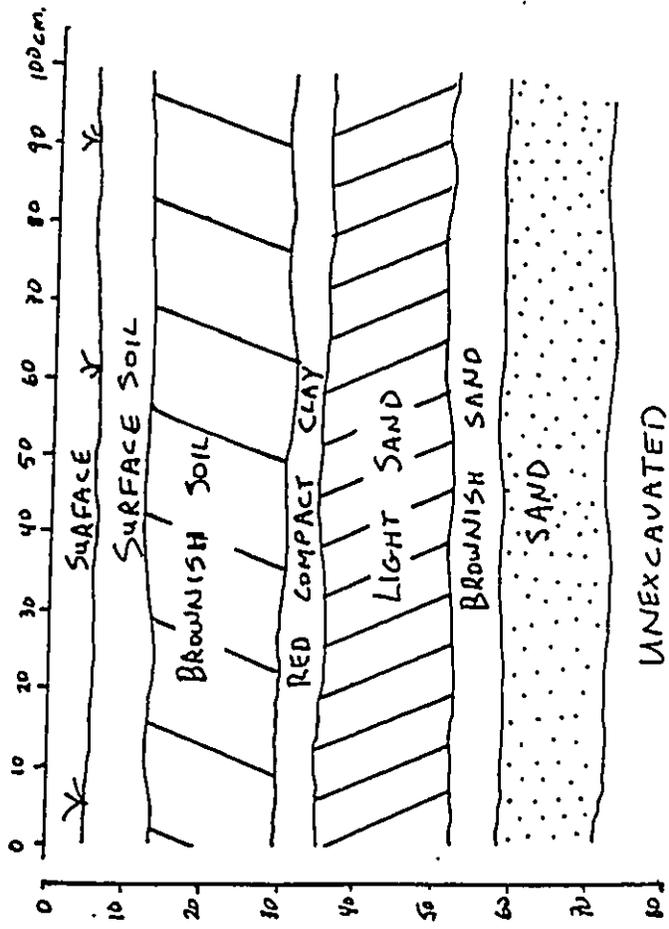
T.T. # 5 F-1 PROFILE: NORTH EAST FACE
 OF FEATURE 2
 (PLATFORM) 15 Nov '88



48

FIGURE 11

I.T. # 6 PROFILE: NORTH EAST FACE (MAUKA) 9 Nov '88



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FIGURE 12

T.I. #10
 ① PROFILE: NORTH FACE
 ② PLAN VIEW
 13 Nov '88

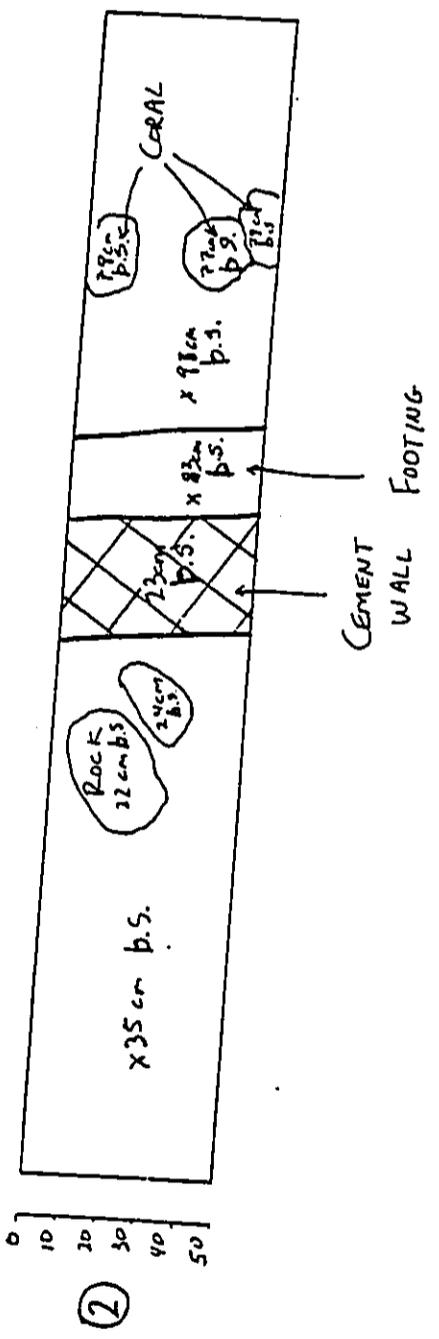
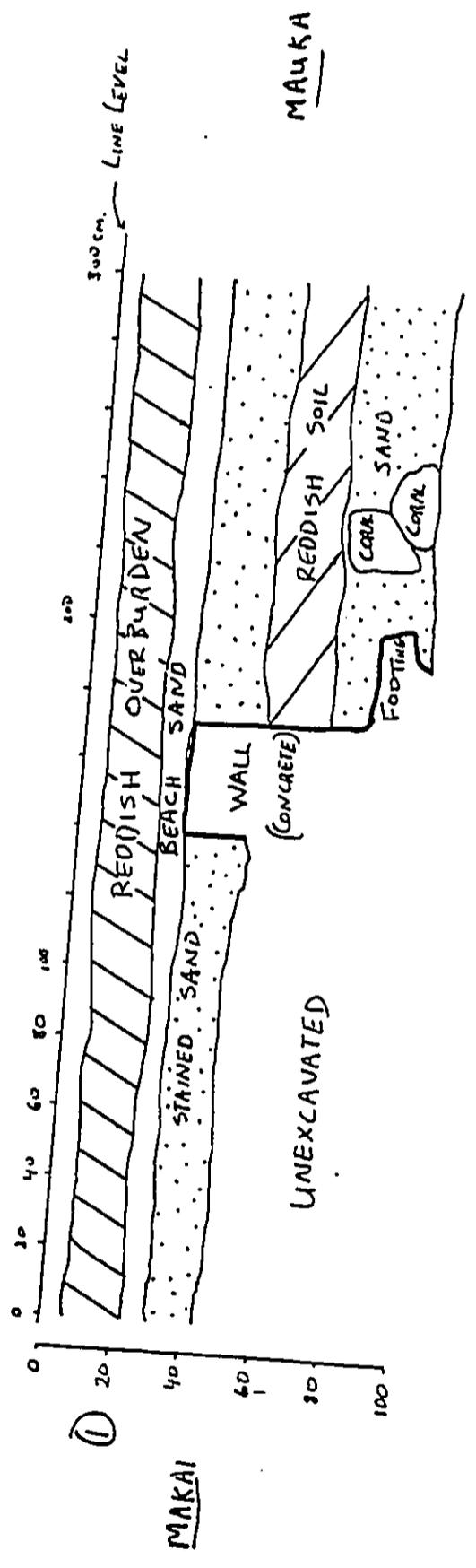
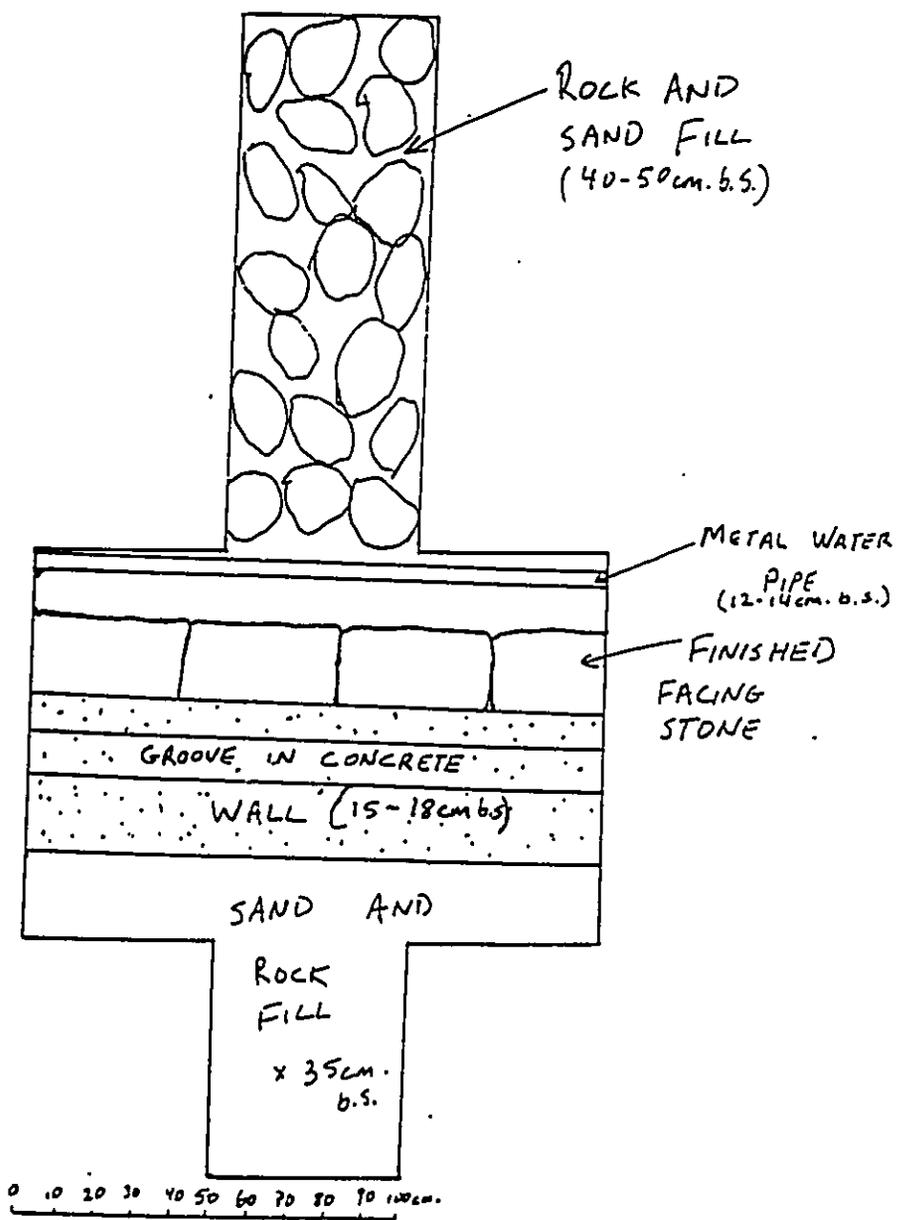


FIGURE 13

T.T. #11 PLAN VIEW: OLD ARMORY WALL

14 NOV. '88

(MAUKA)



(MAKAI)

FIGURE 14

0 20 40 60 80 100 120 140 160 180 200 220 240 260 280 300 320 340 360 380 400 420 440 460 480 500 520 540 560 580 600 620 640 660 680 700 720 740 760 780 800 820 840 860 880 900 920 940 960 980 1000

T.T. # 12 PROFILE: NORTH WEST FACE 12 Nov. '88

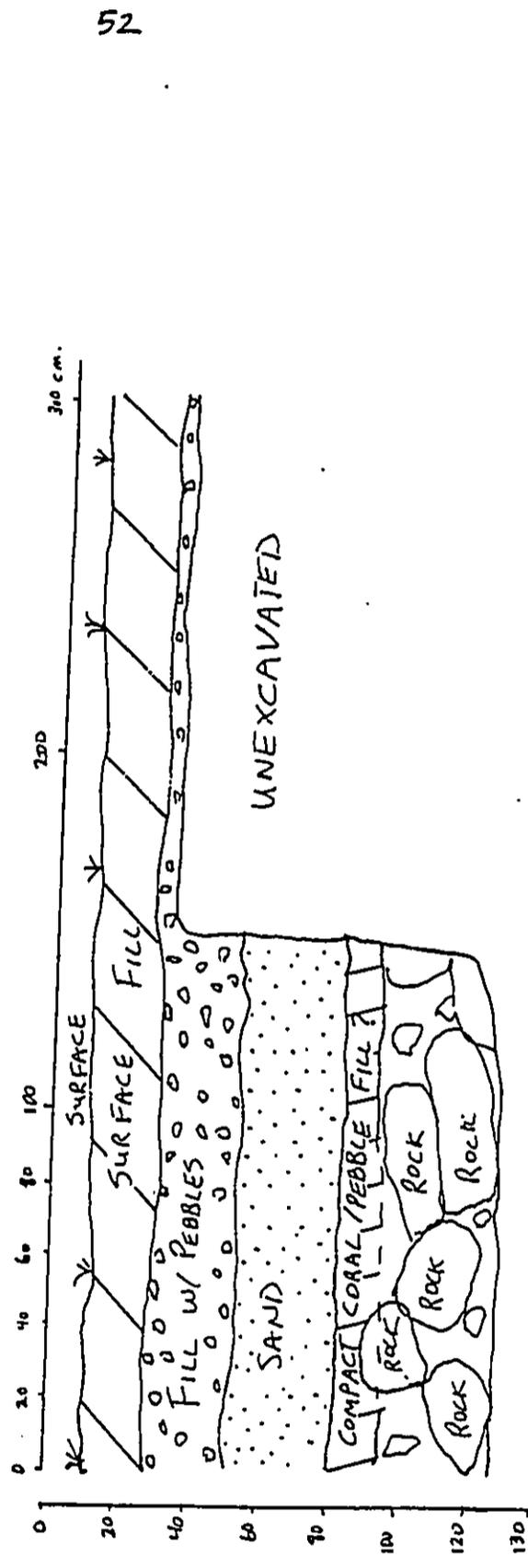
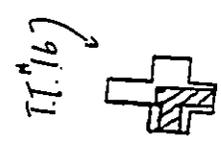
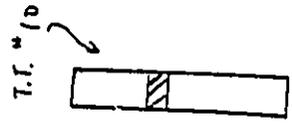
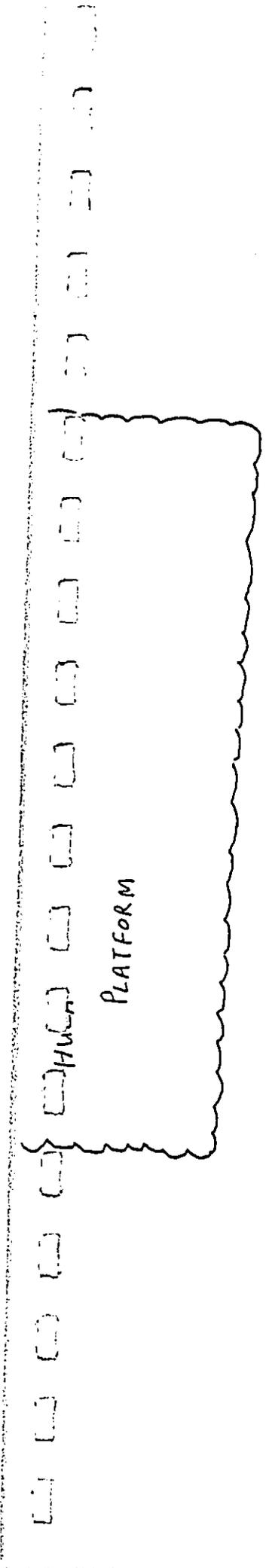
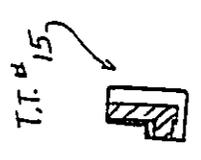
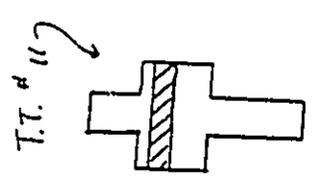
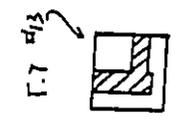


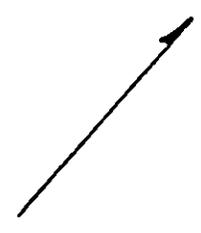
FIGURE 15



SCALE: 0 ——— 1 METERS



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PLAN VIEW: OLD ARMORY CORNER FOUNDATIONS
AND PORTIONS OF WALLS 14 Nov. '38

FIGURE 17

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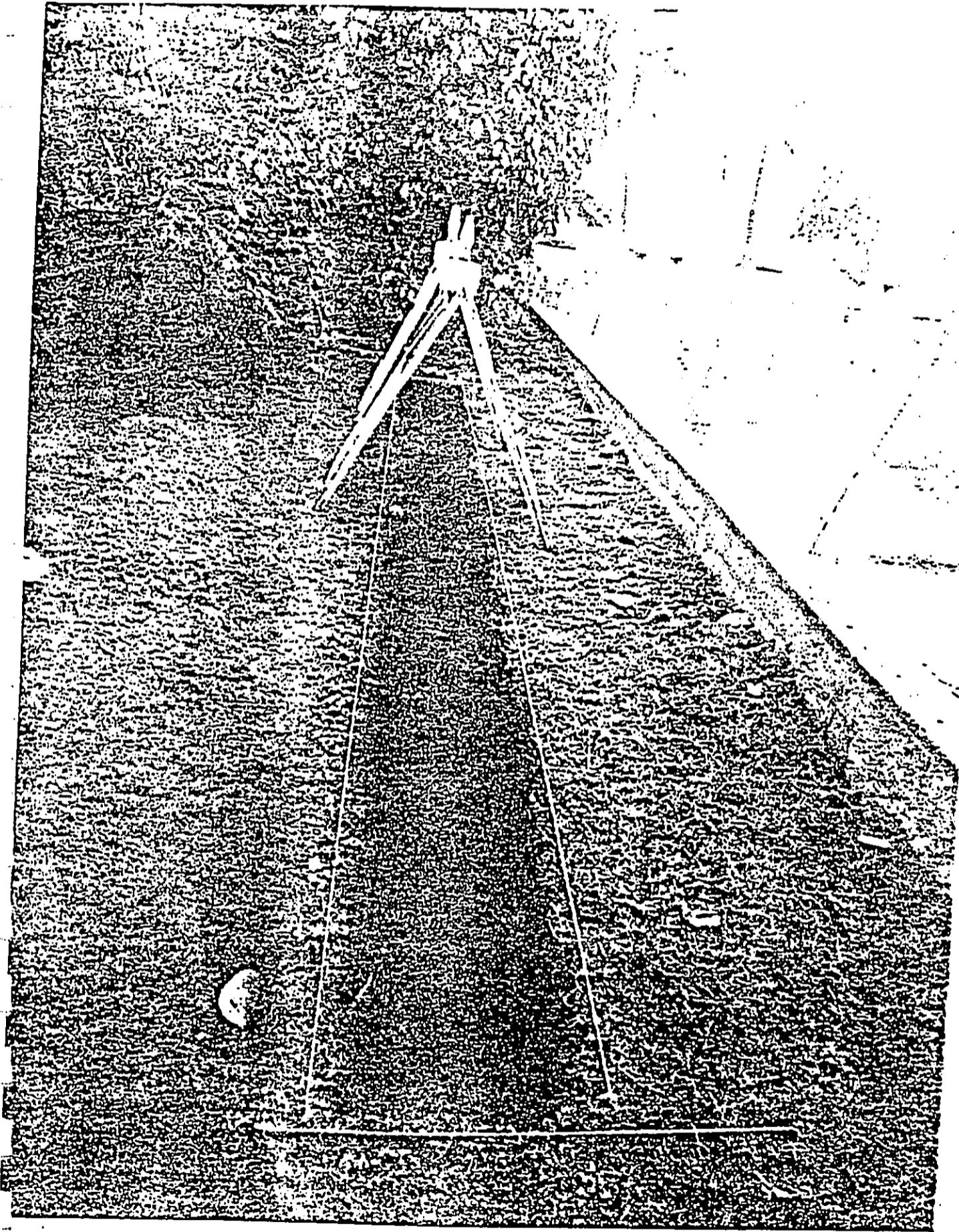


Photo 1

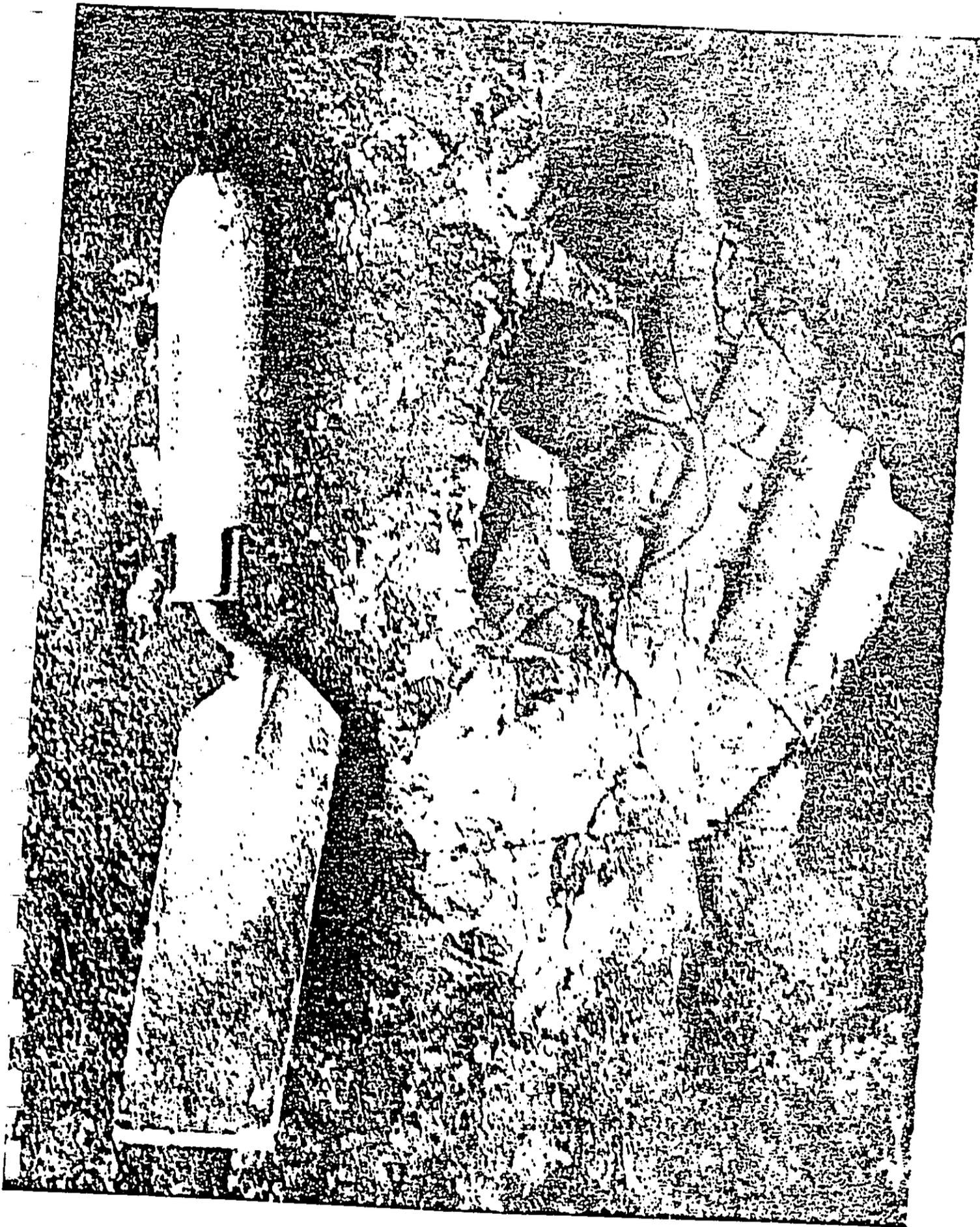


Photo 2

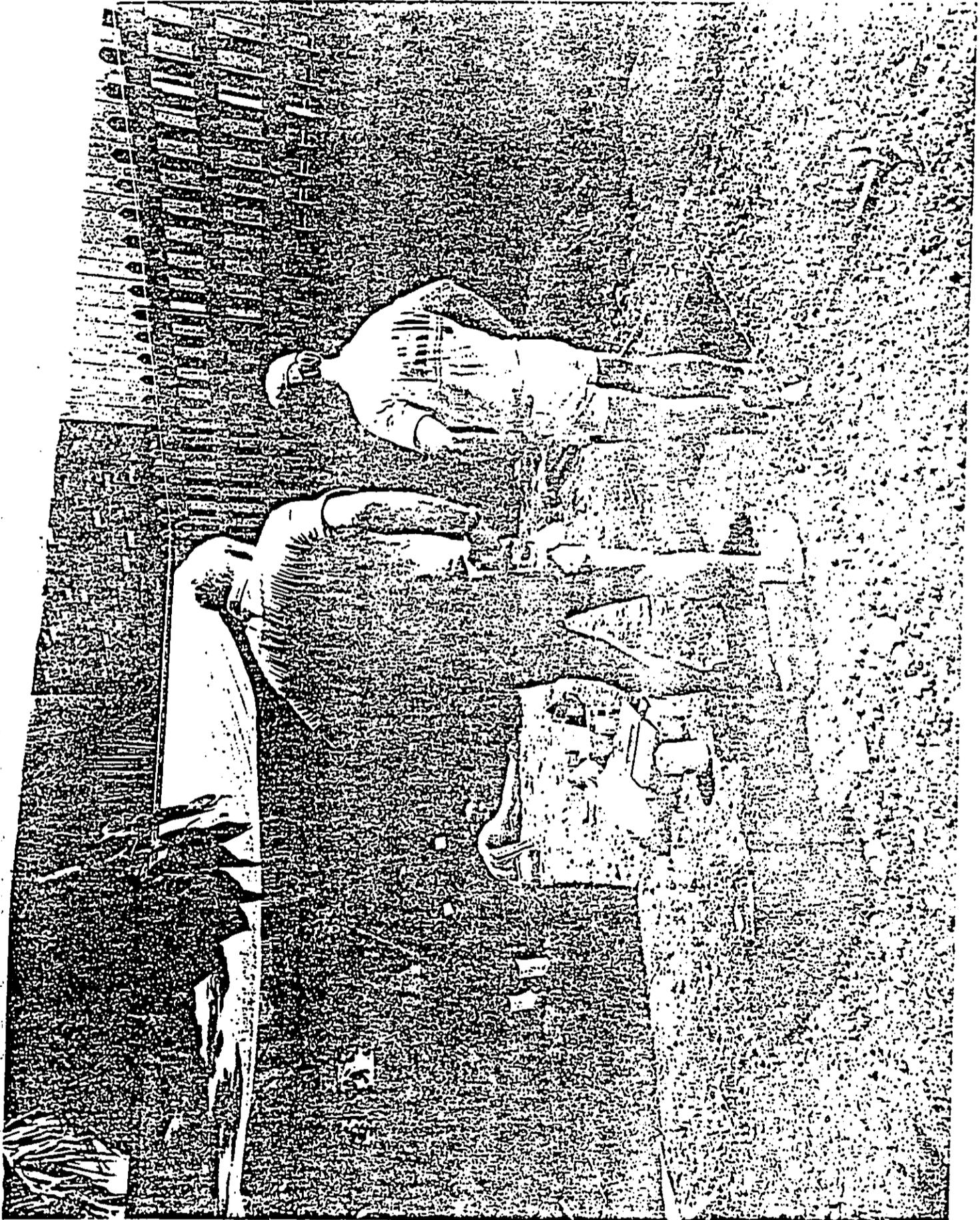


Photo 3

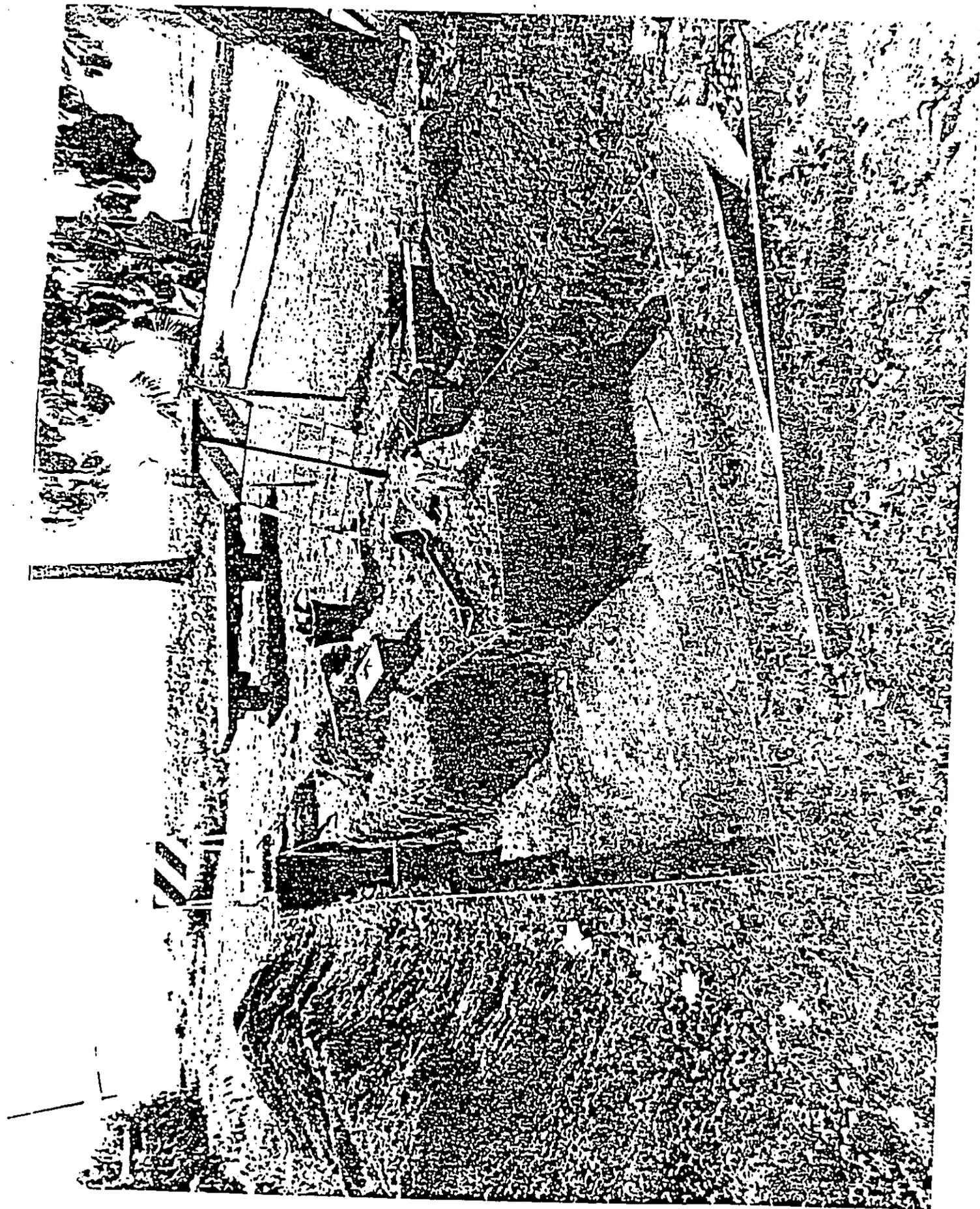


Photo 4



Photo 5



Photo 6

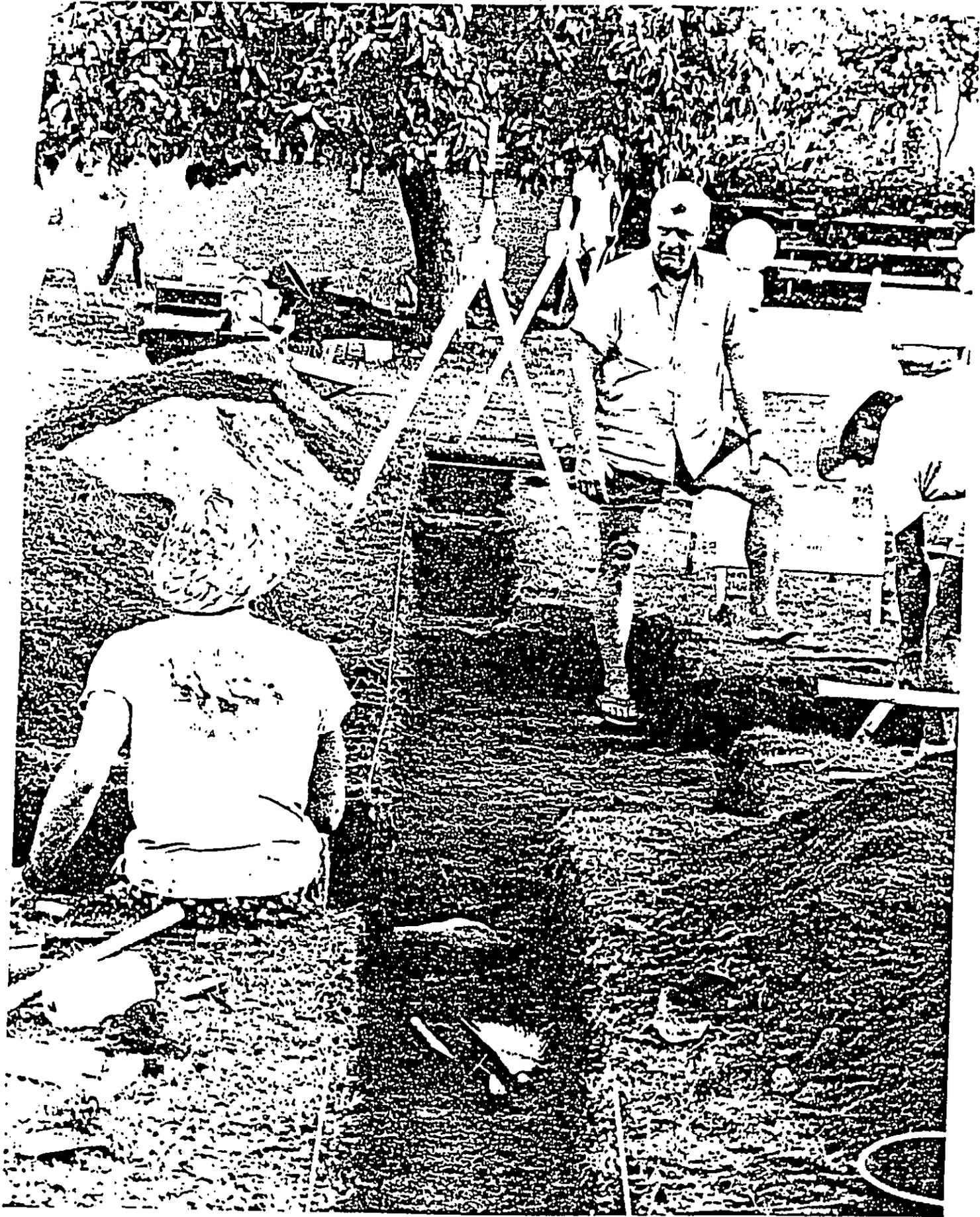
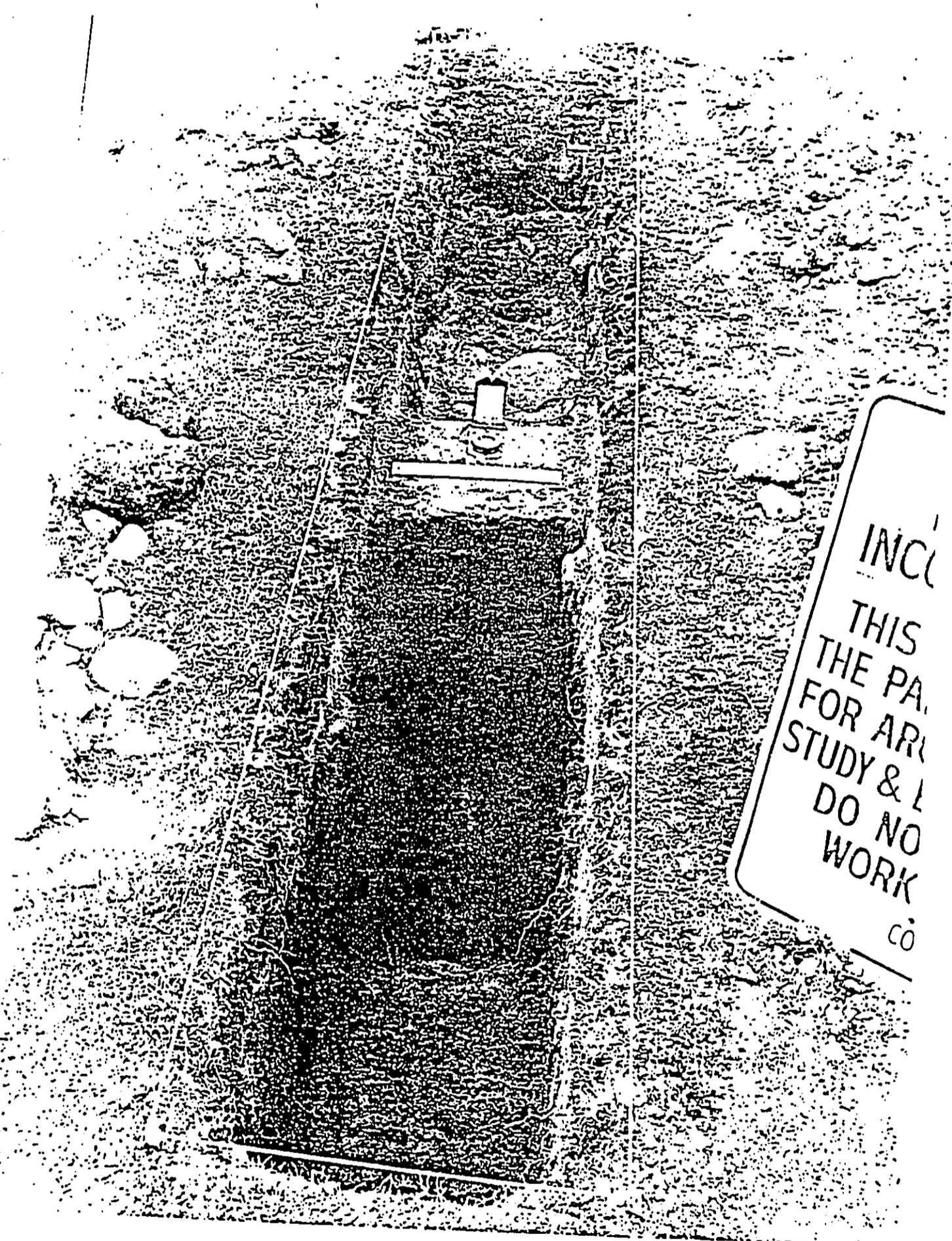


Photo 7



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Photo 8

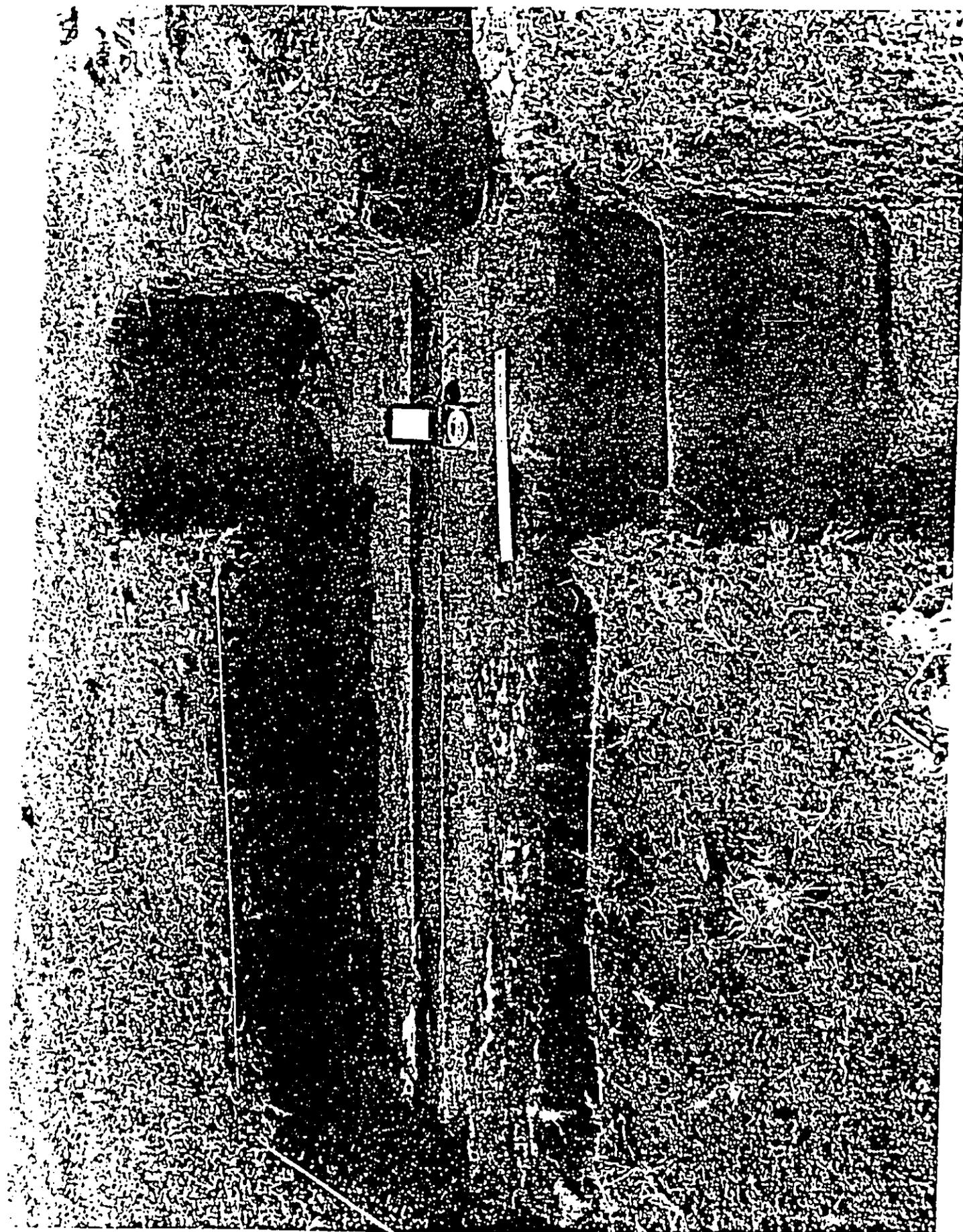


Photo 9

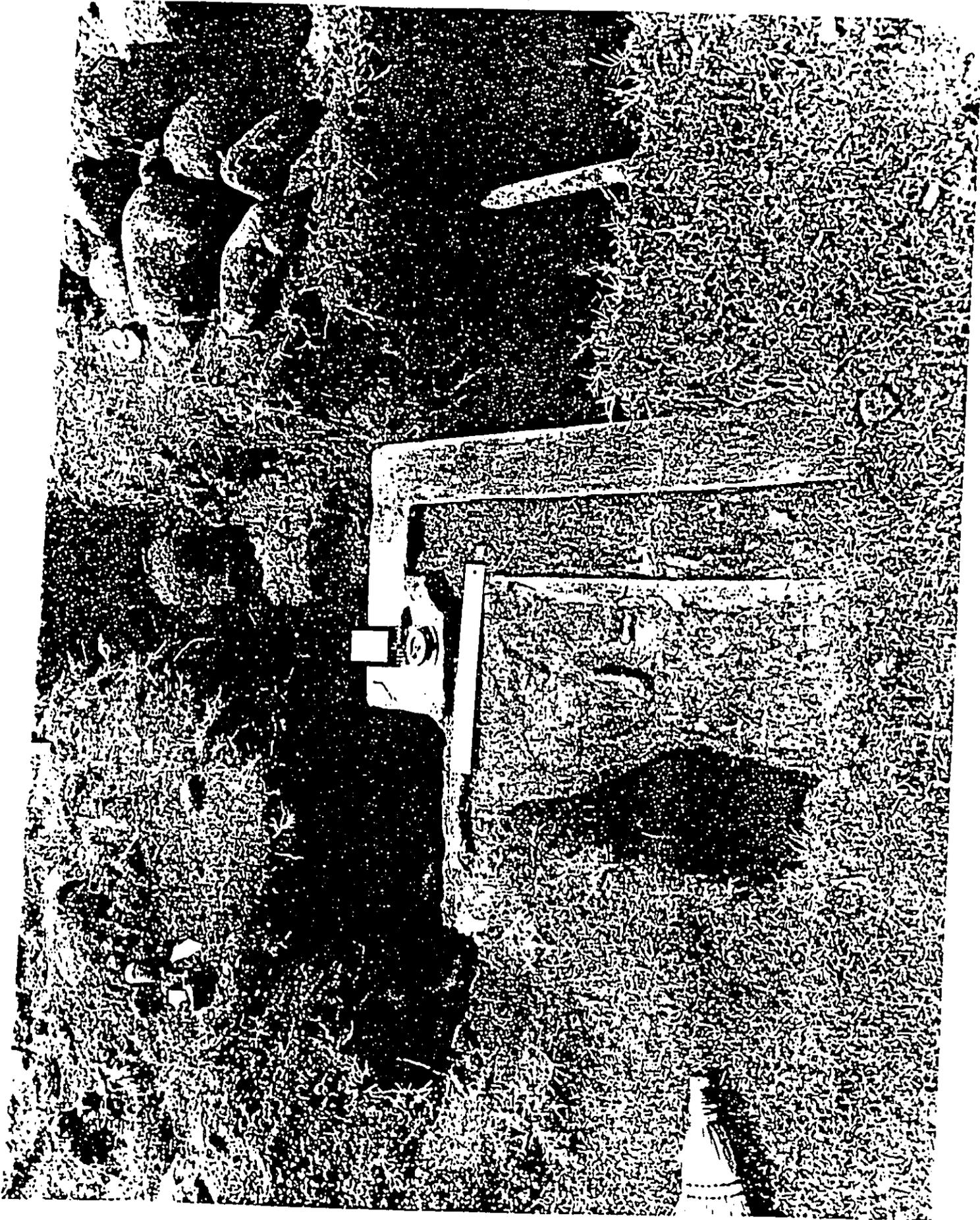


Photo 10

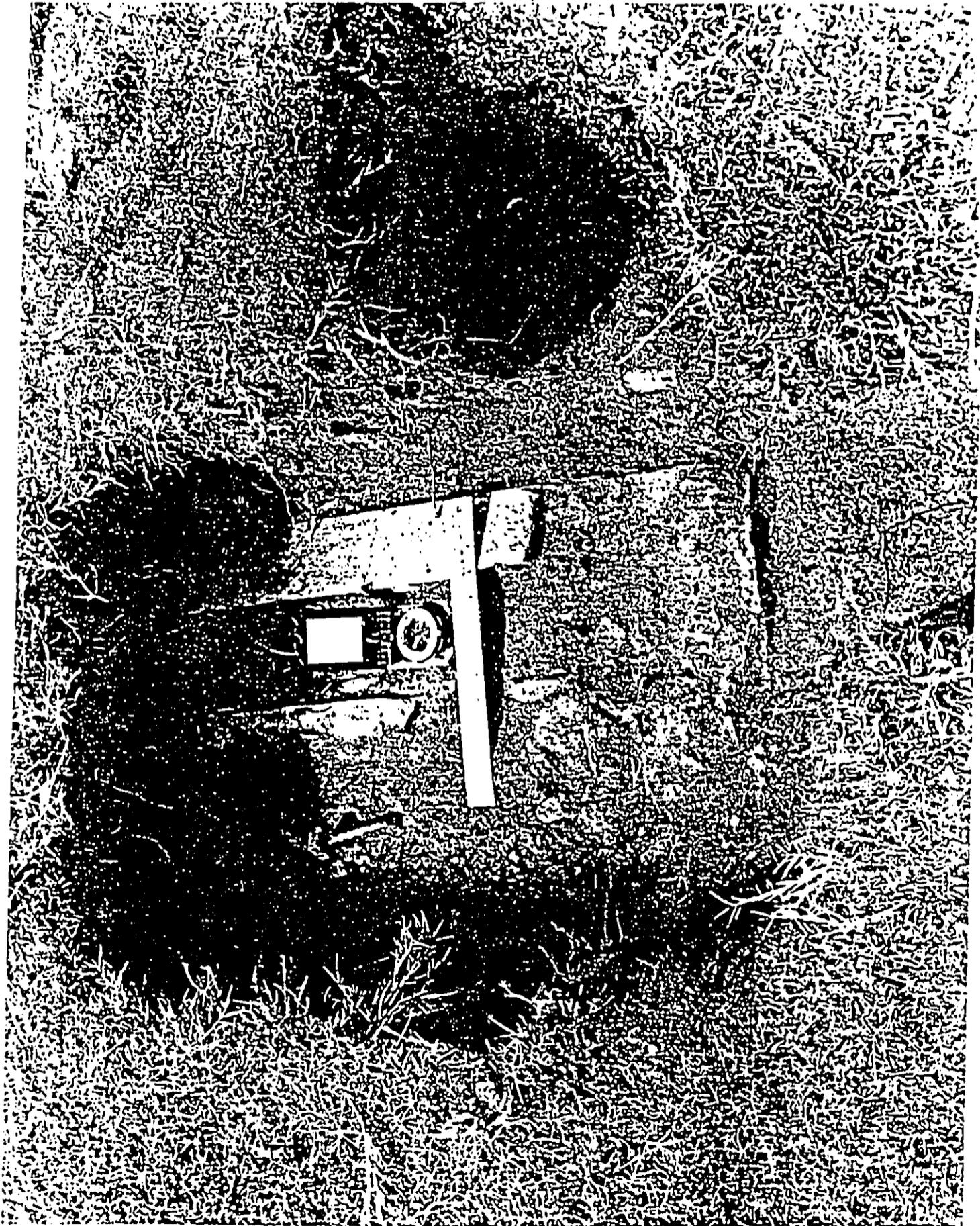


Photo 11

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Photo 12

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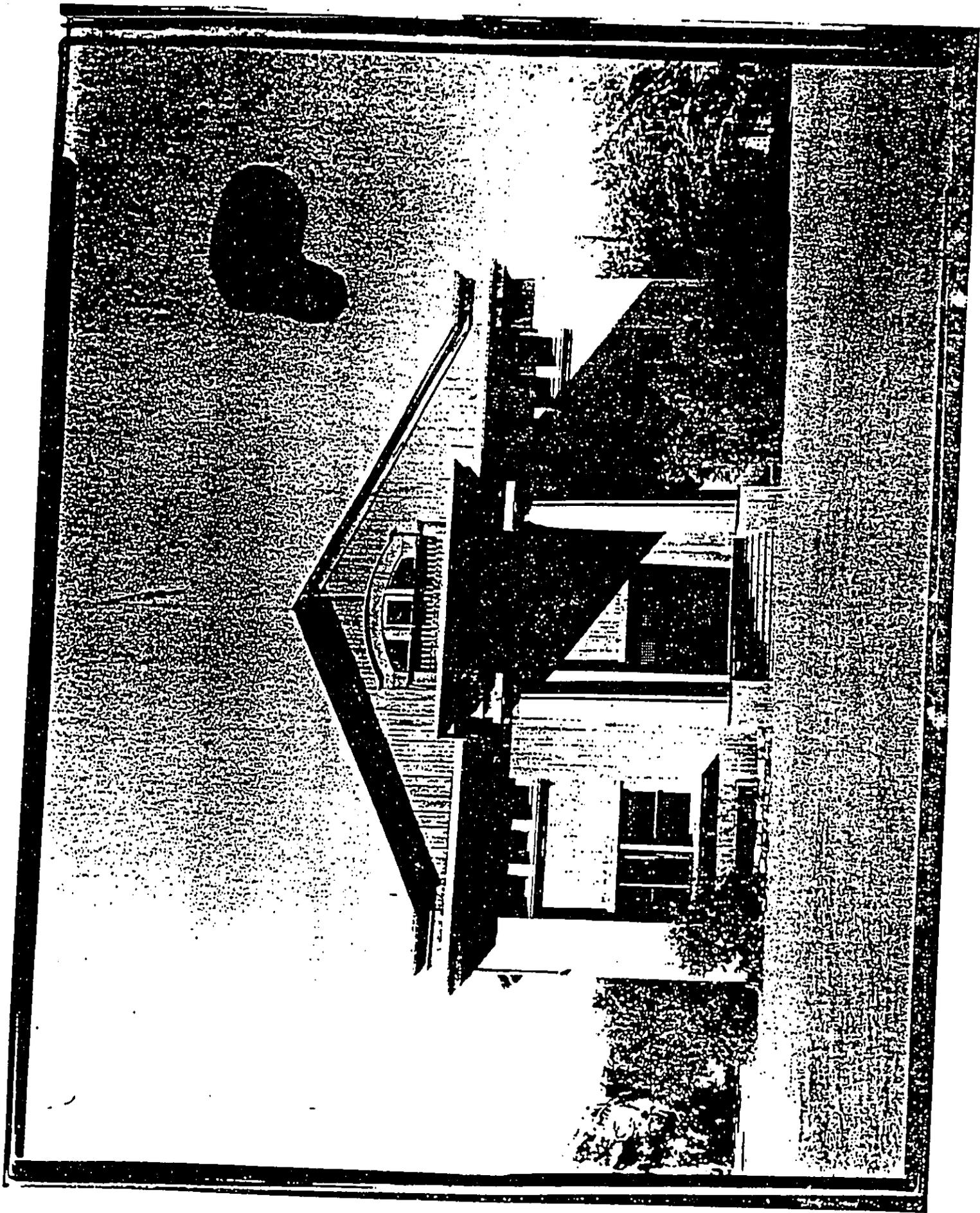
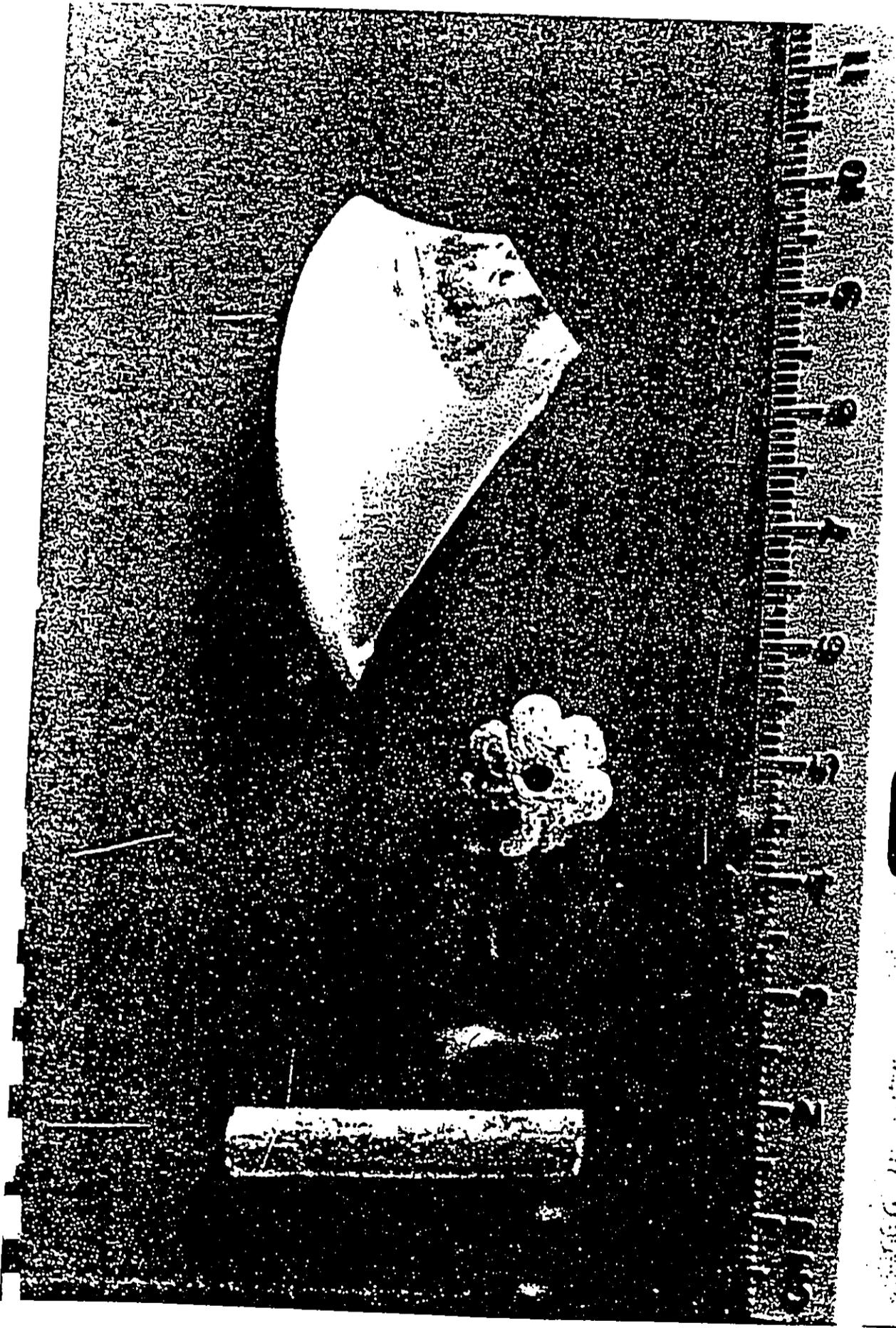


Photo 13



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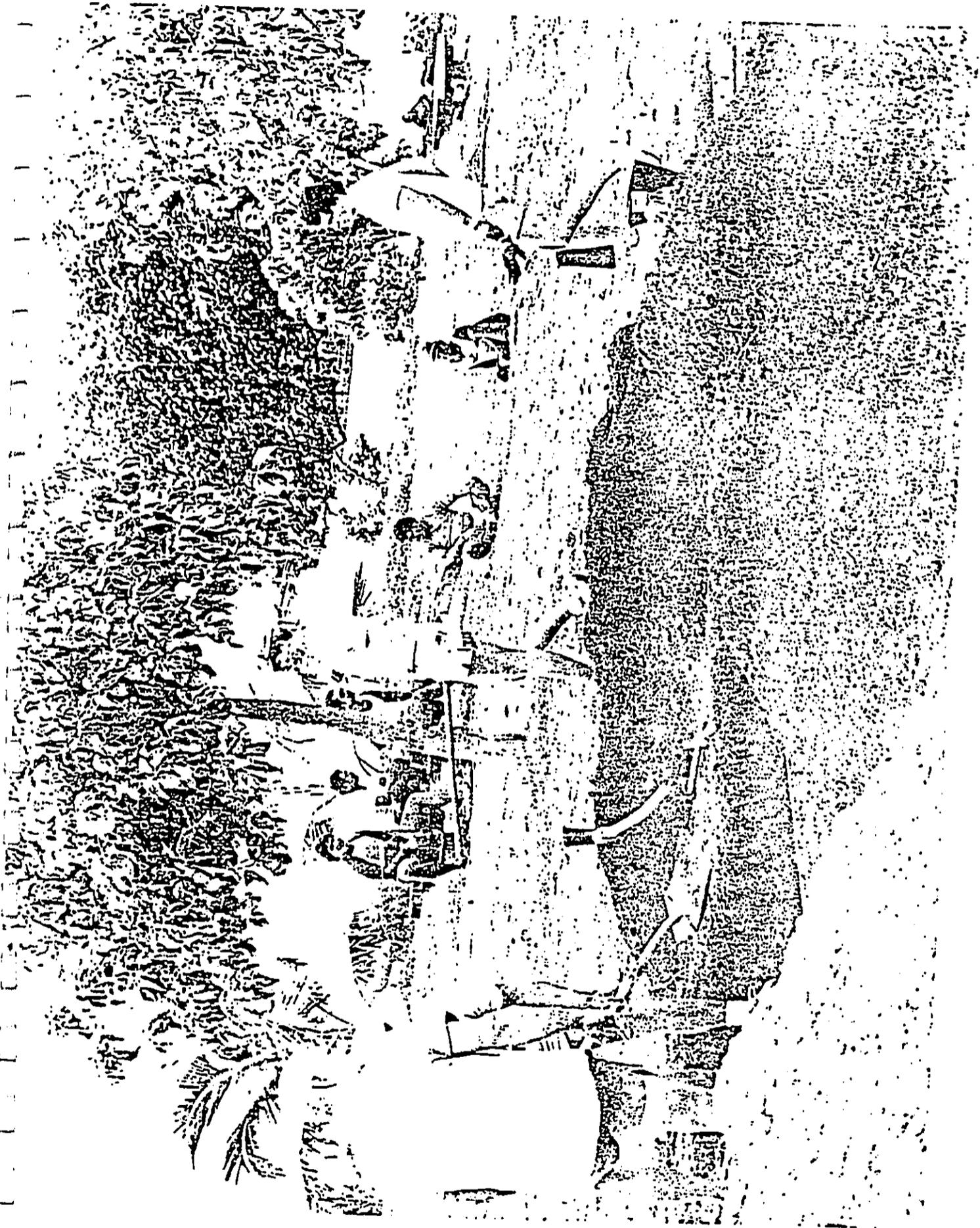


Photo 15

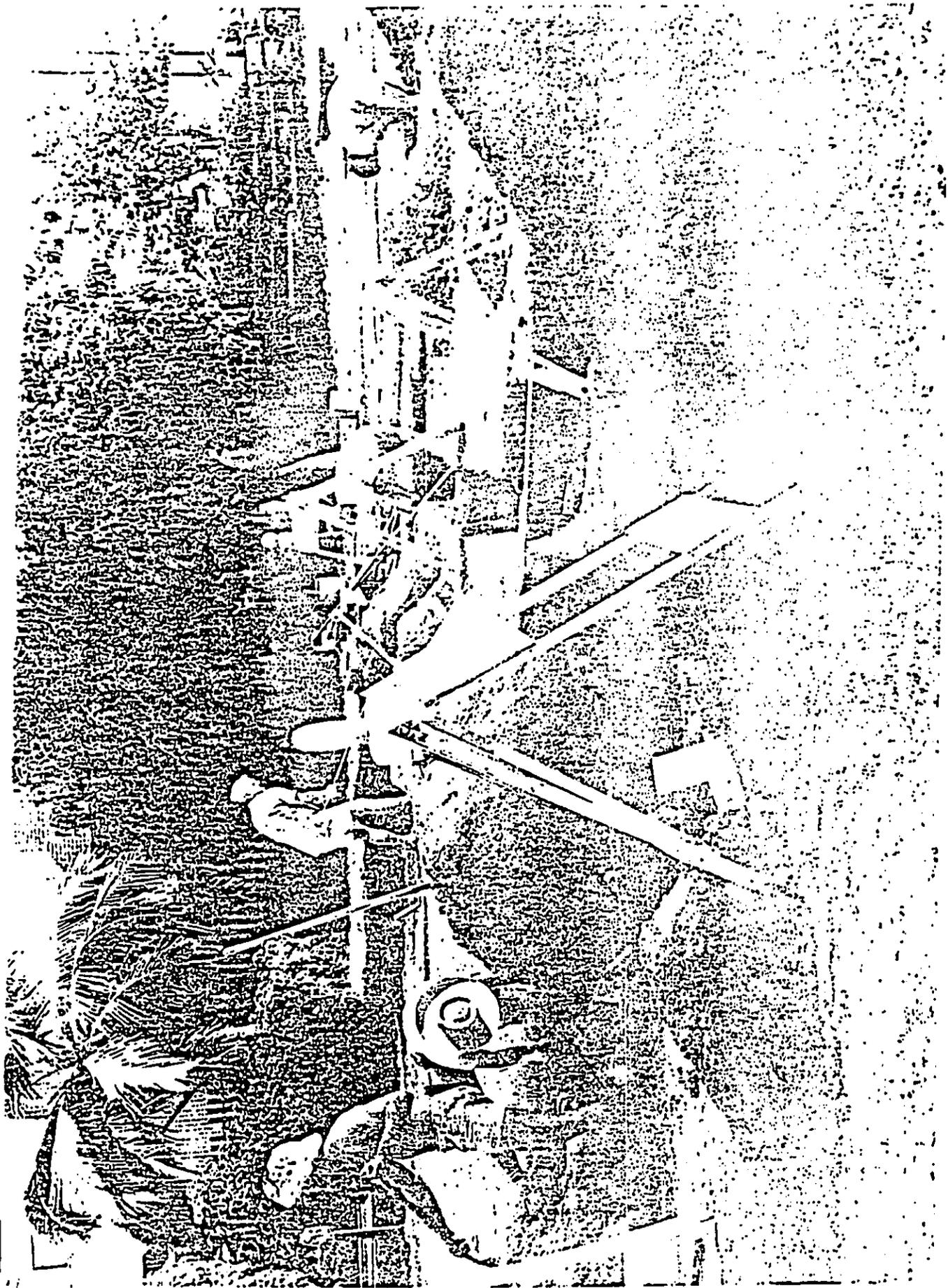


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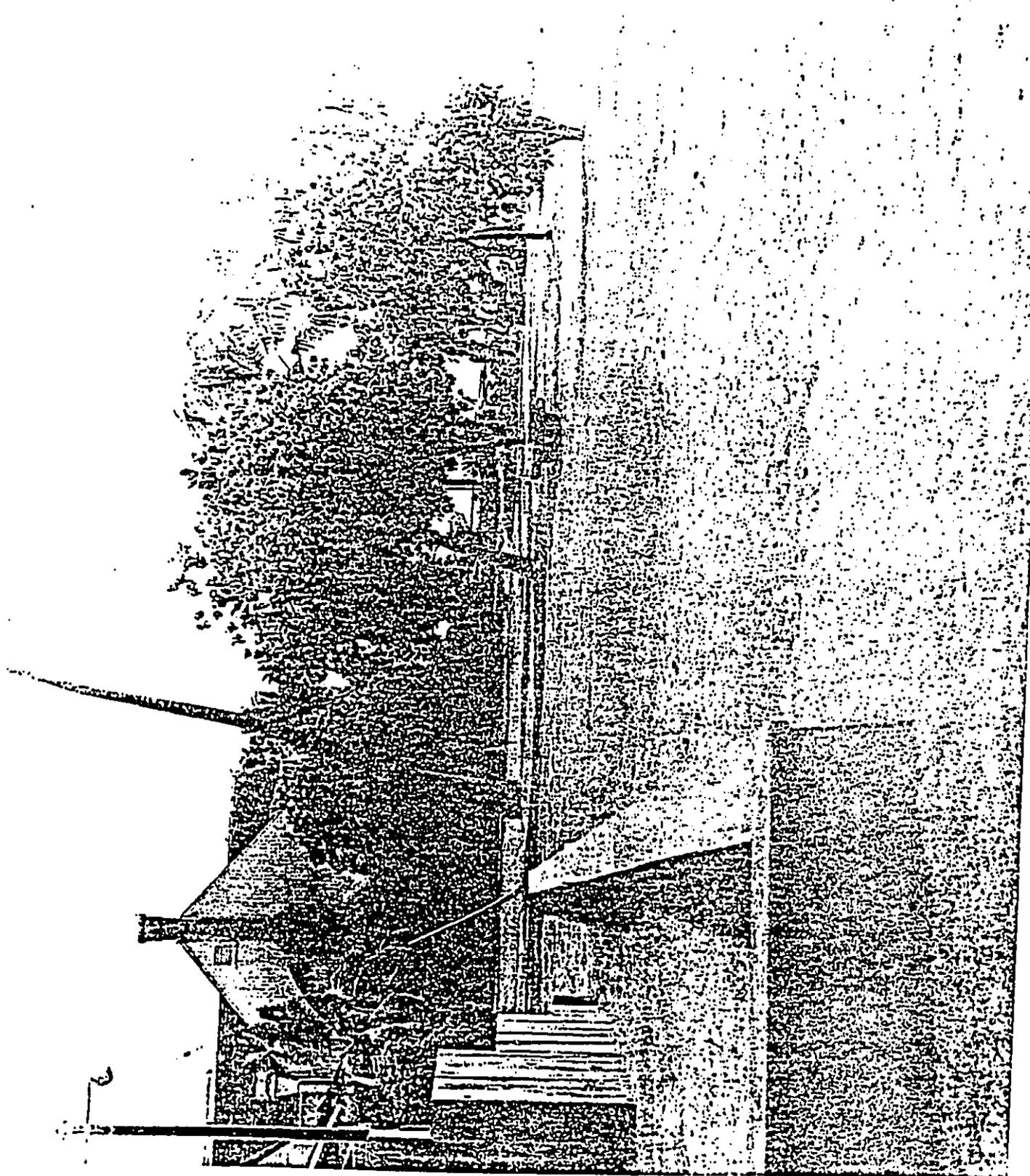


Photo 17

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DRAFT EA COMMENT LETTERS
AND RESPONSES

LINDA LINGLE
Mayor

DAVID W. BLANE
Director

LISA M. NUYEN
Deputy Director



COUNTY OF MAUI
DEPARTMENT OF PLANNING

August 11, 1998

CLAYTON I. YOSHIDA
Planning Division

AARON H. SHINMOTO
Zoning Administration and
Enforcement Division

Mr. Christopher L. Hart
Chris Hart & Partners
1955 Main Street, Suite 200
Wailuku, Hawaii 96793

Dear Mr. Hart:

RE: Special Management Area Application, Shoreline Setback Variance Application and Historic District Application for the Proposed Kamehameha Iki Park Improvements at TMK:4-6-002:010 (SM1_980019) (SSV_980003) (HDC 980009)

The Maui Planning Department (Department) is in receipt of your applications and based on its preliminary review, finds that the following submittal is required to complete your applications:

1. Documentation that compliance to Chapter 343, Hawaii Revised Statutes, Environmental Impact Statements, has been fulfilled or is in the process of being completed;
2. Your assessment on archaeological and historic resources should include how the proposed improvements comply with the following documents adopted by the Maui County Cultural Resources Commission (MCCRC) as guidelines:
 - a. "Cultural Resources Management Plan for Maui County" prepared by the Maui Planning Department, dated May, 1984;
 - b. "Proposal for the Historical Restoration and Preservation of Lahaina" prepared by Community Planning Inc., dated May, 1961;
 - c. "The Architectural Style Book for Lahaina" prepared by John T. Jacobson, A.I.A., dated October, 1969;

250 SOUTH HIGH STREET, WAILUKU, MAUI, HAWAII 96793
PLANNING DIVISION (808) 243-7735; ZONING DIVISION (808) 243-7253; FACSIMILE (808) 243-7634



Mr. Christopher L. Hart
August 11, 1998
Page 2

- d. "Office of Hawaiian Affairs Guidelines for the Consideration of Traditional Native Hawaiian Values in Historic Preservation Review", dated 1988; and
- e. "Lahaina Environmental Design Manual" prepared by Chapman, Phillips, Brandt, Reddick and Associates, Inc., dated October, 1975.

Further, was there any preliminary consultation conducted with the Department of Land and Natural Resources, State Historic Preservation Division (DLNR, SHPD) on the Environmental Assessment (EA)? In particular, did DLNR, SHPD acknowledge that an Archaeological Inventory Survey would not be required of the project and need not be included in the EA?

- 3. A Preliminary Drainage Report and Traffic Analysis Report were not submitted as part of the application. Was any preliminary consultation on the EA held with the Department of Public Works and Waste Management indicating that a Preliminary Drainage Report or Traffic Analysis Report would not be required? Normally a Preliminary Drainage Report is submitted as part of the submittal documents, as well as a Traffic Analysis Report for potential generators of traffic. In the case of Kamehameha Iki Park, the use of the park for canoe or boating activities will increase the traffic in an area already experiencing traffic and parking problems. These issues should be addressed in greater detail, such as, additional requirements for parking, the transport/storage of canoes on trailers, traffic circulation in the area, and ingress and egress concerns.

Although your summary indicates that there is parking at 505 Front Street and at Malu-Ulu-O-Lele Park to accommodate overflows from Kamehameha Iki Park, it should be noted that 505 Front Street patrons and employees are already impacting the parking lot on Shaw Street due to the inadequacy of their parking facilities. As such, it cannot be relied upon as overflow parking.

Mr. Christopher L. Hart
August 11, 1998
Page 3

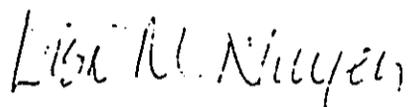
Further, the on-street parking in the area is also utilized by the users of Malu-Ulu-O-Lele Park and the nearby users in the area, including the Holy Innocents Episcopal Church. These factors should also be considered in your analysis.

4. Kamehameha Iki Park is a shoreline parcel also involving a Shoreline Setback Variance. As such, a valid Certified Shoreline Survey Map should be included in the application submittal. Please submit at least five (5) copies of the survey map to the Department.
5. Although authorization has been included from Hui O Wa'a Kaulua, your application must also include authorization from the Department of Parks and Recreation who has administrative control over the public lands granted to the County of Maui through executive order.

To facilitate the processing of your applications for a public facility owned by the County of Maui, the Department will transmit the application booklets to the various reviewing agencies. However, until the requested submittal is filed with the Department and transmitted to the appropriate agencies, your applications will not be complete and there may be delays in the review process from the reviewing agencies due to the lack of information.

Thank you for your cooperation. If additional clarification is required, please contact Ms. Colleen Suyama, Staff Planner, of this office at 243-7735.

Sincerely,

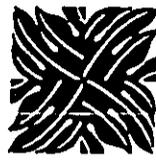


LISA M. NUYEN
Director of Planning

Mr. Christopher L. Hart
August 11, 1998
Page 4

LMN:CMS:osy

c: Clayton Yoshida, A.I.C.P., Planning Program Administrator
Aaron Shinmoto, P.E., Planning Program Administrator
Colleen Suyama, Staff Planner
Christine Moschetti, Hui O Wa`a Kaulua
Project File
General File
(S:\CMS\98sm119a)



CHRIS
HART
& PARTNERS

April 19, 1999

Mr. John E. Min, Director
Planning Department, County of Maui
250 South High Street
Wailuku, Hawaii 96793

ATTN: Colleen Suyama, Staff Planner

RE: Applications for Special Management Area Permit, Shoreline Setback
Variance and Historic District Approval for the Proposed Kamehameha
Iki Park Improvements at Lahaina, Maui, Hawaii at TMK 4-6-002: 010.
(SM 980019) (SSV 980003) (HDC 980009)

Dear Mr. Min:

In response to your letters dated August 11, 1998 and March 31, 1999, we offer the following comments:

1. Processing of the Draft Environmental Assessment (EA) is being handled by the Mayor's Office as the approving agency for the project's funding. A notice of availability of the Draft EA for Public Review was published in the September 8, 1998 Environmental Notice. Production of the Final EA and response to comments was delayed due to the need for completion of a Shoreline Certification for the parcel. A Final EA and Finding of No Significant Impact will be forwarded to OEQC for publication in the May 8, 1999 Environmental Notice.
2. Provided below is an assessment of how the proposed improvements at Kamehameha Iki Park comply with the various documents adopted by the Maui County Cultural Resources Commission (MCCRC).
 - a) The County's Cultural Resources Management Plan provides three specific recommendations which supports the proposed project:
 9. Encourage the private sector and State to implement meaningful

interpretive programs at significant and archaeological sites.

11. Evaluate sites on County owned lands for possible restoration and interpretive projects.

17. Organize community services and private organizations to serve as guardians and guides at interpretive sites and to monitor and assist in providing security and control at sites.

One of the project's main goals is to provide the County of Maui with a Hawaiian heritage site where Hawaiian culture is taught, shared and preserved. The historical significance of the project site is an important aspect of the group's objectives. The rich history of the site and surrounding area creates a unique opportunity for interpretive historic preservation. When completed, the park will provide an interpretive program which educates visitors in the significance of the park history, most notably as the site of King Kamehameha III's palace. Based on the foregoing, the proposed project is consistent with the recommendations of the CRMP.

- b) "Lahaina Environmental Design Manual" (LEDM) defines the Historic Architectural Styles in the Lahaina Area in three (3) periods. The first is the period before 1820 and is referred to as Native Hawaiian. The second period is the 19th Century and is referred to as the Missionary period, and this is followed by the middle 1800s through early 1900s, referred to as the Victorian period.

The proposed improvements are consistent with styles from the first period - Native Hawaiian, and as such are consistent with the LEDM.

- c) "The Architectural Style Book for Lahaina" provides further details regarding the different styles from the three historical periods. The proposed structures are consistent in terms of shape, form, scale and materials with the structures shown on Sheets B-1 through B-3.
- d) "Office of Hawaiian Affairs Guidelines for the Consideration of Traditional Native Hawaiian Cultural Values in Historic Preservation Review" discusses the purpose of Historic Preservation and Kinds of Historic Value. The report explains the significance of historic preservation as it gives meaning to being Hawaiian, which enhances the entire community's sense of history and identity.

The proposed improvements at Kamehameha Iki Park are supportive of and intended to foster the following categories of public values identified in OHA's document:

- Architectural value: the importance of a property as an example of any architectural type or period, the work of a particular architect or group, or the application of particular concepts, methods or technology;
 - Associative value: the importance of a property as a reminder of an event, a person, a process or trend affecting the history of the world, the nation, or region, community or group;
 - Use value: the potential of an historic property for continued productive use as a part of modern society;
 - Informational value: the potential of an historic property to provide information, through recordation or archaeological research that is useful to the study of important aspects of the past;
 - Cultural value: the contribution made by an historical property to an ongoing society or cultural system. It is this sort of value that is the focus of these guidelines.
- e) One of the objectives of the "Proposal for the Historical Restoration & Preservation of Lahaina", prepared in 1961, was to "develop a comprehensive plan for the future growth of Lahaina, in which the historic sites and plan for the cultural area take their place in a framework of the larger general plan for the town and district of Lahaina."

The restoration plan identified a number of specific actions involving the preservation of existing historic buildings and sites as well as the rebuilding of structures which formerly existed. Major elements of the plan include the relocation of Kamehameha III Elementary School and reconstruction of royal residences once present at the site, the reconstruction of Kamehameha III's residence and Moku'ula Island, as well as the surrounding water feature (Mokuhinia), reconstruction of Hale Piula, Kamehameha III's palace, etc. In all, the plan recommends

reconstructing approximately 20 historical buildings which had been previously demolished.

Obviously, many aspects of the restoration plan have not been implemented. One of the plan's major tenets, the restoration of significant features associated with the region of Kamehameha III, is a goal that is being actively pursued by members of the community at Moku'ula.

As noted above, a major goal of the project is to inform visitors to the park about the historical past associated with the site; most notably the site's importance during the reign of Kamehameha III. Buildings at the site have been designed after traditional Hawaiian architecture, plans for the education center-research room were developed using the plans for Princess Nahienaena's house shown on page 37 of this report.

Based on the above, this project is consistent with the 1961 historic restoration plan.

3. We have discussed the project's drainage and traffic impacts with Mr. David Goode, Deputy Director of the Department of Public Works and Waste Management. We explained to Mr. Goode that upon completion of the full build out of all improvements in the Park redevelopment plan there will be a net decrease in impervious surfaces. Based on this decrease in impervious surface and the adequacy of the existing drainlines in the area, Mr. Goode felt that a preliminary drainage control report was not necessary at this time.

Regarding the need for a traffic impact analysis, we explained to Mr. Goode that the number of new vehicle trips generated by the project will be minimal given that the existing uses of the park will remain essentially the same after project completion. As noted in the Draft EA, there is a substantial amount of canoe or boating activities taking place at the park at the present time. Based on these representations, and the relatively low level of vehicle trips expected at the completion of the project, Mr. Goode indicated that a Traffic Impact Assessment would not be necessary for the project.

With regard to parking stalls, any future improvements at the park will require the provision of parking stalls in accordance with Chapter 19.36, Maui County Code. Our preliminary calculations indicate that this requirement will amount to 28 spaces. We foresee no problem in complying with the requirements of Chapter 19.36, MCC.

Mr. John E. Min, Director, Planning Department,
Applications for SMA, SSV and H.D.
for the Proposed Kamehameha Iki Park Improvements at Lahaina, Maui, Hawai'i.
April 19, 1999, Page 5

4. Five copies of the valid certified Shoreline Survey Map will be forwarded to your office when completed. Mr. Mullane's comments are addressed in a separate letter which will be forwarded to your office.
5. The written authorization for Hui O Wa'a Kaulua to use Kamehameha Iki Park will be in the form of a lease that is being processed by with the Department of Housing and Human Concerns and the Maui County Council. We have met with Mr. Phil Ohta, Maui Land Agent of the Department of Land and Natural Resources, and he has advised us that the proposed lease appears to be consistent with Executive Order 2771; however, the lease must be approved by the Board of Land and Natural Resources prior to finalization. The applicant will work with the County to bring the matter before the Board after the environmental review process is complete.

If you have further questions, please contact Rory Frampton at 242-1955.

Sincerely yours,



Christopher L. Hart, ASLA
Landscape Architect-Planner

c: Christine Moschetti, Hui O Wa'a Kaulua
Roz Baker, Maui County Office of Economic Development



**DEPARTMENT OF BUSINESS,
ECONOMIC DEVELOPMENT & TOURISM**

OFFICE OF PLANNING

235 South Beretania Street, 6th Flr., Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

'98 AUG 25 P 1:19

BENJAMIN J. CAYE

SEIJIF

BRADLEY J. MOSS

RICK EG

Tel (808) 587-2

Fax (808) 587-2

Ref. No. P-7655

August 17, 1998

Ms. Lisa M. Nuyen
Planning Director
Department of Planning
County of Maui
250 South High Street
Wailuku, Hawaii 96793

Attn: Colleen Suyama

Dear Ms. Nuyen

**Subject: Applications for Special Management Area Permit, Historic District Approval,
and Shoreline Setback Variance, Kamehameha Iki Park Improvements, Lahaina,
Maui, Hawaii, TMK: 4-6-02:10**

The subject applications document has adequately addressed the project's consistency and compliance with the Coastal Zone Management (CZM) objectives and policies. We do not have any additional comments to offer.

If there are any questions about this, please contact Doug Tom of our CZM Program at 587-2875.

Sincerely,

Rick Egged
Director
Office of Planning



'98 AUG 19 12:57

August 18, 1998

Ms. Lisa Nuyen
Planning Director
Maui Planning Department
250 S. High Street
Wailuku, HI 96793

Dear Ms. Nuyen:

Subject: Kamehameha Iki Park Improvements
TMK: 4-6-002:010
I.D.: SM1 980019, SSV 980003, HDC 980009

Thank you for allowing us to comment on the subject project.

In reviewing the information transmitted, we have no objection to the subject project. We encourage the developer's electrical consultant to meet with us as soon as practical to verify the project's electrical requirements so that service can be provided on a timely basis.

If you have any questions or concerns, please call Dan Takahata at 871-2385.

Sincerely,


Edward L. Reinhardt
Manager, Engineering

ELR/dt:lh

LINDA LINGLE
MAYOR



RONALD P. DAVIS
CHIEF

HENRY A. LINDO, SR.
DEPUTY CHIEF

98 AUG 20 2:43 PM
COUNTY OF MAUI
DEPARTMENT OF FIRE CONTROL

200 DAIRY ROAD
KAHULUI, MAUI, HAWAII 96732
(808) 243-7561

August 20, 1998

Ms Colleen Suyama, Staff Planner
County of Maui, Department of Planning
250 South High Street
Wailuku, HI 96793

RE: SM1 980019; SSV 980003; HDC 980009;
TMK: 4-6-02:10; Kamehameha Iki Park Improvements

Dear Ms Suyama,

Thank you for the opportunity to comment on the above applications for the Kamehameha Iki Park Improvements.

The Department of Fire Control has no objection to granting the above applications. However, the department wishes to reserve the right to comment when the plans and specifications are submitted for review.

There are several items mentioned in the application that may need to be addressed here: 1. A kitchen is to be constructed in the Hale Wa'a, plans and specifications are required to be submitted for a hood and duct system with an approved fire-extinguishing system installed.

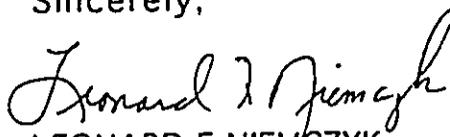
2. A meeting room on the second floor of the Hale Wa'a, if the occupant load exceeds 9 persons, a second exit is required.

Ms Colleen Suyama
Page 2
August 20, 1998

3. The location and calculations for existing or proposed fire hydrants shall be included in the plans and specifications.
4. A positive variance shall be obtained for the use of the, thatching material in the zoning district outside of the designated hotel district, from the board of variances and appeals.
5. An approved automatic fire sprinkler system shall be required for the fire protection of all thatched structures.

If you have any questions, you may contact me at extension 7566.

Sincerely,


LEONARD F NIEMCZYK
Captain, FPB



CHRIS
HART
& PARTNERS

April 19, 1999

Mr. Clayton Ishikawa, Chief
Department of Fire Control, County of Maui
200 Dairy Road
Kahului, Hawaii 96732

ATTN: Mr. Leonard F. Niemczki, Captain, FPB

RE: Special Management Area, Shoreline Setback Variance and Historic District Approval Applications for the Proposed Kamehameha Iki Park Improvements at Lahaina, Maui, Hawaii at TMK 4-6-002: 010. (South Maui 980019) (SSV 980003) (HDC 980009)

Dear Mr. Ichikawa:

In response to former Chief Ron Davis's letter dated August 20, 1998, we offer the following comments:

1. Thank you for the submittal requirements for a kitchen. Hale Wa`a will be built in the second phase of development of the park. Required specifications for the kitchen will be reviewed through the building permit process.
2. There is a second exit proposed for the second floor meeting room in Hale Wa`a.
3. The location and calculations for existing or proposed hydrants will be addressed during the building permit process.
4. The applicant will work with the Department of Public Works & Waste Management regarding the use of thatching materials and will apply for a variance if needed.
5. Again the applicant will work with the Fire Department and Department of Public Works & Waste Management to determine, design and receive

LANDSCAPE ARCHITECTURE AND PLANNING

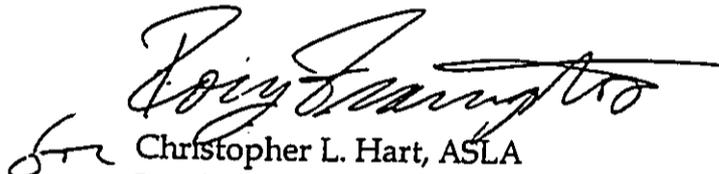
1955 MAIN STREET, SUITE 200 • WAILUKU, MAUI, HAWAII 96793-1706 • PHONE: 808-242-1955 • FAX: 808-242-1956

Mr. Clayton Ichikawa, Chief, Department of Fire Control, County of Maui
Applications for SMA, SSV and HDA
for the Proposed Kamehameha Iki Park Improvements at Lahaina, Maui, Hawai'i
April 19, 1999, Page 2

approval on the necessary improvements for protection of health and safety
for future uses of these facilities.

If you have further questions, please contact Rory Frampton at 242-1955.

Sincerely yours,


Christopher L. Hart, ASLA
Landscape Architect-Planner

cc: Colleen Suyama, Planning
Christine Moschetti, Hui O Wa'a Kaulua
Roz Baker, Maui County Office of Economic Development

BENJAMIN I. CAHO (AHE)
GOVERNOR



'98 AUG 25 05:30

SAM CALLEJO
COMPTROLLER

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING
AND GENERAL SERVICES
PROPERTY DIVISION
P. O. BOX 110
HONOLULU, HAWAII 96810

RESPONSE REFER TO

FILE NO

August 24, 1998

MEMORANDUM

TO: Ms. Lisa M. Nuyen, Planning Director
Maui County Planning Department

ATTN: Colleen Suyama, Staff Planner

FROM: Randall M. Hashimoto, State Land Surveyor

SUBJECT: I.D.: SM1 980019, SSV 98003, HDC 98009
TMK: 4-6-002:010
Project Name: Kanehameha Iki Park Improvements
Applicant: Christopher Hart, on Behalf of Hui O Wa'a Kaulua

The subject proposal has been reviewed and confirmed that no Government Survey Triangulation Stations and Benchmarks are affected. The Survey Division has no objections to the proposed project.

Randall M. Hashimoto
RANDALL M. HASHIMOTO
State Land Surveyor



DEPARTMENT OF THE ARMY
U S ARMY ENGINEER DISTRICT, HONOLULU
FT SHAFTER, HAWAII 96858-5440

REPLY TO
ATTENTION OF

August 26, 1998

'98 AUG 28 02:54

Civil Works Branch

Ms. Colleen Suyama, Staff Planner
County of Maui
Planning Department
250 South High Street
Wailuku, Maui, Hawaii 96793

Dear Ms. Suyama:

Thank you for the opportunity to review and comment on the Special Management Area Application and Draft Environmental Assessment (DEA) for the Kamehameha Iki Park Improvements Project, Lahaina, Maui (TMK 4-6-2: 10). The following comments are provided in accordance with Corps of Engineers authorities to provide flood hazard information and to issue Department of the Army (DA) permits.

- a. Based on the information provided, a DA permit will not be required for the project.
- b. The flood hazard information provided on page 7 of the DEA is correct.

Sincerely,

Paul Mizue, P.E.
Chief, Civil Works Branch



LINDA LINGLE
MAYOR

OUR REFERENCE
at
YOUR REFERENCE

POLICE DEPARTMENT
COUNTY OF MAUI

55 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411

SEP 27 4 53 33



THOMAS PHILLIPS
CHIEF OF POLICE

August 26, 1998

MEMORANDUM

TO : DIRECTOR, PLANNING DEPARTMENT
FROM : THOMAS M. PHILLIPS, CHIEF OF POLICE
SUBJECT : I.D.: SMI 980019, SSV 980003, HDC 980009
TMK: 4-6-002:010
Project Name: Kamehameha Iki Park Improvements
Applicant: Christopher L. Hart, on Behalf of
Hui O Wa'a Kaulua

No recommendation or special condition is necessary or desired.
 Refer to attachment(s).


Assistant Chief Richie Nakashima
for: THOMAS M. PHILLIPS
Chief of Police

BENJAMIN J. CAYETANO
GOVERNOR



98 AUG 28 10 4 34

LAWRENCE MIKI
DEPUTY GOVERNOR

ALFRED M. ARENSDORF, M.D.
District Health Officer

STATE OF HAWAII
DEPARTMENT OF HEALTH
MAUI DISTRICT HEALTH OFFICE

KAHAKOHOLO
KAHAKOHOLO MAUI, HAWAII 96793

August 27, 1998

Ms. Lisa M. Nuyen
Director
Planning Department
County of Maui
250 South High Street
Wailuku, Hawai'i 96793

Dear Ms. Nuyen:

Subject: Kamehameha Iki Park Improvements
TMK: (2) 4-6-02: 10
SM1 980019, SSV 98003, HDC 980009

Thank you for the opportunity to comment on the applications for the Kamehameha Iki Park improvements. We have no comments to offer at this time.

Should you have any questions, please call me at 984-8230.

Sincerely,


HERBERT S. MATSUBAYASHI
District Environmental Health Program Chief



United States
Department of
Agriculture

Natural
Resources
Conservation
Service

210 Imi Kala St.
Suite 209
Wailuku, HI
96793 2100

Our People...Our Islands...In Harmony

98 JUN 28 12:58

DATE: August 27, 1998

Ms. Lisa M. Nuyen, Director
Department of Planning
County of Maui
250 S. High Street
Wailuku, Hawaii 96793

Dear Ms. Nuyen,

SUBJECT: Kamehameha Iki Park Improvements
TMK: 4-6-002: 010
I.D. SM1 980019, SSV 980003, HDC 980009

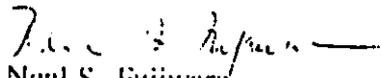
Contrary to what is noted in the drainage section on page 17, the interceptor ditches constructed by Pioneer Mill mauka of the town are to protect the sugar lands, however, they outlet into "dead" gulches which drain within this project area.

The West Maui Soil & Water Conservation District and County of Maui through our agency has a proposed Lahaina Flood Control Project to correct this problem. However, without strong county and community backing, the project may not be constructed.

The present drainline along Maluuluolele Park is not functioning adequately. The subject park site is presently the only other open space area beside the drainline which outlet between Kamehameha III School and Holy Innocents Church. Another possible outlet may be needed if the Lahaina Flood Control Project is not implemented.

Thank you for the opportunity to comment.

Sincerely,


Neal S. Fujiwara
District Conservationist



CHRIS
HART
& PARTNERS

April 19, 1999

Mr. Neil S. Fujiwara, District Conservationist
United States Department of Agriculture
Natural Resources Conservation Service
210 Imi Kala Street, Suite 209
Wailuku, Hawai'i 96793-2100

RE: Special Management Area, Shoreline Setback Variance and Historic
District Approval Applications for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawaii at TMK 4-6-002: 010.
(South Maui 980019) (SSV 980003) (HDC 980009)

Dear Mr. Fujiwara:

Thank you for your letter dated August 27, 1998, regarding the above-referenced project. We apologize for the delay in responding to you.

We agree that the statements regarding drainage patterns in Lahaina town appear somewhat misleading. These statements were taken from an infrastructure report prepared as part of the Front Street Improvement project and appear to imply that the canefield ditches mauka of Lahaina alleviate all of the potential flooding problems in Lahaina town. While it is true that these ditches may provide some mitigation of Lahaina's drainage problems, we acknowledge the importance of providing a permanent drainage diversion structure which is appropriately engineered, designed and constructed. Only after completion of such a structure will potential flooding problems from lands mauka of Lahaina Town be alleviated.

We will amend the drainage section of this report to note the need for a mauka drainage structure and to point out the sub-standard nature of existing diversion structures.

The proposed project will not preclude the installation of an additional drainage outlet to the ocean, if needed, since there will be ample space along the northern property line.

Mr. Neil S. Fujiwara, District Conservationist, USDA
Applications for SMA, SSV and H.D.
for the Proposed Kamehameha Iki Park Improvements at Lahaina, Maui, Hawai'i
April 19, 1999, Page 2

If you have further questions, please contact Rory Frampton at 242-1955.

Sincerely yours,

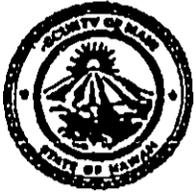

for Christopher L. Hart, ASLA
Landscape Architect-Planner

cc: Colleen Suyama, Planning
Christine Moschetti, Hui O Wa'a Kaulua
Roz Baker, Maui County Office of Economic Development

69.30 SENT BY: COUNTY MAUI PLANNING ; 4-20-98 ; 11:11AM ;

8082437634

8082421956;# 2



DEPARTMENT OF
PARKS AND RECREATION
COUNTY OF MAUI

1880-C KAAHUMANU AVENUE WAILUKU, HAWAII 96793 98 SEP -1 P3:36

LINDA LINGLE
Mayor

HENRY OLIVA
Director

ALLEN SHISHIDO
Deputy Director

(808) 243-7230
FAX (808) 243-7934

DEPT OF PLANNING
COUNTY OF MAUI

August 24, 1998 RECEIVED

Ms. Lisa M. Nuyen
Director of Planning
250 South High Street
Wailuku, HI 96793

Dear Ms. Nuyen:

Subject: Special management Area Permit, Historic District Approval and Shoreline Setback Variance for Kamehameha Iki Park Improvements

We have reviewed the applications for the above-referenced project and submit the following comments:

1. The use of the property has been granted to the County of Maui by Executive Order 2771 for park use. The State Department of Land and Natural Resources should be consulted to determine if the proposed use by Hui 'O Wa'a Kaula is within the intent of the Executive Order.
2. There is no indication in the application as to the authority for Hui 'O Wa'a Kaula to develop and use the property. In addition, there is no indication as to whether Hui 'O Wa'a Kaula is a registered nonprofit (501) organization.
3. In November 1988, an archaeological survey was conducted at the site by Xamanek Researches for the Department of Parks and Recreation, County of Maui in conjunction with the development of a children's playground park. In 1993, an archaeological excavation and report on Moku'ula, which abuts the site, was prepared by Bishop Museum. There is no reference to either of these reports.
4. As noted in both reports, the project site is notable for being the site of Hale Piula, the palace of Kamehameha III. The significance of the site should be further discussed in the Draft Environmental Assessment.
5. The Lahaina Community Plan states the goal for cultural resources "to preserve and protect significant archaeological, historical and cultural resources, and sites that best represent and exemplify the Lahaina region's ... Hawaiian Monarchy" It also states under Objectives and Policies to "Establish programs to restore, maintain and interpret significant cultural

SENT BY: COUNTY MAUI PLANNING ; 4-20-99 ; 11:11AM ;

8082437634→

8082421956: # 3

Ms. Lisa Nuyen
August 24, 1998
Page 2

districts, sites and artifacts in both natural and museum settings." The Draft Environmental Assessment should address how the proposed actions will comply with these goals, objectives, and policies.

Thank you for the opportunity to review and comment in this matter. Please feel free to contact me or Mr. Patrick Matsui, Chief of Parks Planning and Development, at extension 7387 should you have any other questions.

Sincerely,



 HENRY OLIVA
Director

c: Patrick Matsui, Chief of Planning and Development
Tamara Horcajo, Chief of Recreation

s:\planning\pun\kamsiki.wpd



DEPARTMENT OF
PARKS AND RECREATION
COUNTY OF MAUI

1580-C KAAHUMANU AVENUE WAILUKU, HAWAII 96793

LINDA LINGLE
Mayor

HENRY OLIVA
Director

ALLEN SHISHIDO
Deputy Director

(808) 243-7230
FAX (808) 243-7934

August 31, 1998

MEMO TO: Lisa Nuyen, Director
Department of Planning

FROM: Henry Oliva, Director

SUBJECT: Special Management Area Application, Shoreline Setback Variance Application and Historic District Application for the proposed Kamehameha Iki Park Improvements at TMK: 4-6-002:010 (SM1 9800 1 0) (SSV 980003) (HDC 980009)

The written authorization for Hui Wa'a Kaulua to use Kamehameha Iki Park will be the approval of the application for a lease that is in process with the Department of Housing and Human Concerns.

Richard Haake has informed Allen Shishido, Deputy Director, that a decision on this application for a lease will be made soon.

c: Richard Haake, Managing Director
Mark Percell, Deputy Director, Department of Housing and Human Concerns
Christine Moschetti, Executive Director, Hui O Wa'a Kaulua

s:\plan\planning\hui owa'a(A5)



CHRIS
HART
& PARTNERS

April 20, 1999

Mr. Floyd Miyazono, Director
Department of Parks and Recreation
County of Maui
1580-C Kaahumanu Avenue
Wailuku, Hawai'i 96793

RE: Special Management Area, Shoreline Setback Variance and Historic
District Approval Applications for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawaii at TMK 4-6-002: 010.
(SM 980019) (SSV 980003) (HDC 980009)

Dear Mr. Miyazono:

In regards to Mr. Henry Oliva's letter dated August 24, 1998, we offer the following responses to your comments:

1. The stated intent of Executive Order 2771 is to allow the County of Maui to use the subject property of "for expansion of recreational and open space facilities, (park site), to be under the control and management of the County of Maui". We have met with Mr. Phil Ohta, Maui Land Agent of the Department of Land and Natural Resources, and he has advised us that the proposed lease appears to be consistent with Executive Order 2771, however, the lease must be approved by the Board of Land and Natural Resources prior to finalization. The applicant will work with the County to bring the matter before the Board after the environmental review process is complete.
2. The written authorization for Hui O Wa'a Kaulua to use Kamehameha Iki Park will be in the form of a lease that is being processed by with the Department of Housing and Human Concerns and the Maui County Council. Hui O Wa'a Kaulua is a registered nonprofit (501) organization.

Mr. Floyd Miyazono, Director, Department of Parks and Recreation, County of Maui
Applications for SMA, SSV and H.D. for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawai'i.
April 20, 1999, Page 2

3. Our office has amended the *Archaeological and Historical Resources* section of the report utilizing the Xamanek Researches' Archaeological Survey, dated November 1988, together with the 1993, Bishop Museum, Moku`ula Archaeological Excavation and Report, which comments about the general history of Historical Lahaina Town.
4. The site of Hale Piula, the palace of King Kamehameha III, was formerly located on the subject parcel. Hale Piula was started in 1840. In 1848, it was being used as a court house. After the 1858 Kauaula wind storm, Hale Piula was badly damaged and its remaining building blocks were utilized in the Lahaina Court House, which is still standing beside the small boat harbor. The November 1988 Archaeological Inventory Survey by Xamanek Researches provides a more detailed account of the history of this structure. As part of the 1988 Archaeological Inventory Survey, Xamanek performed numerous subsurface test excavations in the undeveloped areas of the park and found no evidence of Hale Piula. The site has been extensively altered by previous development activity associated with the construction and use of the Lahaina Armory. However, the Xamanek report does mention that there exists the possibility of historic remains under the asphalt or concrete slabs which currently cover over half of the parcel. The report recommends that archaeological monitoring should take place during the removal of hard surfaces during future development of the park. We will include a more detailed description of the site's history, especially with regards to Hale Piula, in the Final Environmental Assessment.
5. The goal of Hui O Wa`a Kaulua is to develop Kamehameha Iki Park as a Hawaiian Cultural Park with focus on the design, construction, sailing and maintenance of the traditional Hawaiian double-hulled sailing canoe. It is envisioned that the park will provide the County of Maui with a significant Hawaiian heritage site where the Hawaiian culture is taught, shared and preserved. The historical significance of the site is an important aspect of the group's objectives. The rich history of the site and surrounding area creates a unique opportunity for interpretive historic preservation. In this regard the proposed project is in accordance with the objectives and policies of the West Maui Community Plan. This will be explicitly noted in the Final Environmental Assessment.

Mr. Floyd Miyazono, Director, Department of Parks and Recreation, County of Maui
Applications for SMA, SSV and H.D. for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawai'i.
April 20, 1999, Page 3

If you have further questions, please contact Rory Frampton at 242-1955.

Sincerely yours,



for Christopher L. Hart, ASLA
Landscape Architect-Planner

c: Colleen Suyama, Planning Department
Christine Mosschetti, Hui O Wa'a Kaulua

-7121

PHONE (808) 594-1888



FAX (808) 594-1865

'98 SEP 10 P 1:37

STATE OF HAWAII
OFFICE OF HAWAIIAN AFFAIRS
711 KAPI'OLANI BOULEVARD, SUITE 500
HONOLULU, HAWAII 96813

DEPARTMENT OF
LAND AND NATURAL RESOURCES

September 4, 1998

Ms. Lisa M. Nuyen, Director
Planning Department
County of Maui
250 South High street
Wailuku, HI 96793

PA (98) 115

Re: Kamehameha Iki Park, Applications for Special Management Area Permit,
Historic District Approval and Shoreline Setback Variance

Dear Ms. Nuyen:

Thank you for the opportunity to review the Applications for Special Management Area Permit, Historic District Approval and Shoreline Setback Variance, Kamehameha Iki Park, at 525 Front Street, Lahaina, Maui (TMK 4-6-02:10).

The Office of Hawaiian Affairs (OHA) feels that the intent of this project to promote and provide information and education about Hawaiian culture and the role of sailing canoes is a commendable one.

However, the property identified for use is classified as ceded land. As such, the issue of ceded lands must be addressed in your document. OHA strongly urges that Native Hawaiians be consulted before any efforts to use, modify, or destroy ceded lands.

In addition to discussing the issue of Native Hawaiian archaeological, historical, or cultural resources that may be located above or below the surface at the project site, OHA would also like your document to address the possibility that native Hawaiian gathering rights may exist on the property. A recent Hawaii Supreme Court decision makes it clear that the existence of native rights must be addressed. We suggest that the preparers also seek expert opinion among the Hawaiian community about this issue.

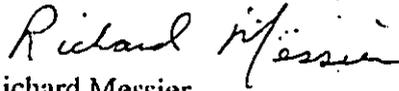
Ms. Lisa M. Nuyen, Director
Planning Department, County of Maui
September 4, 1998
Page two

Should you have any questions concerning our comments, please contact Richard Messier, Acting Land and Natural Resources Division Officer, or Nami Ohtomo, Acting Natural Resource Specialist at 594-1755. Please reference the document number, PA (98) 115, noted at the top of this letter.

Sincerely,



Randall Ogata
Administrator



Richard Messier
Acting LNR Division Officer

cc: Board of Trustees
CAC, Island of Maui



CHRIS
HART
& PARTNERS

April 19, 1999

Mr. Randall Ogata, Administrator
Mr. Richard Messier, Acting LNR Division Officer
Office of Hawaiian Affairs
State of Hawai'i
711 Kapi'olani Boulevard, Suite 500
Honolulu, Hawai'i 96813

RE: Special Management Area, Shoreline Setback Variance and Historic
District Approval Applications for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawaii at TMK 4-6-002: 010.
PA (98) 115

Dear Mr. Ogata and Mr. Messier:

In regards to your letter dated September 4, 1998, we offer the following response to your comments:

1. **Ceded Lands.** Hui O Wa'a Kaulua's goal is to promote and provide education and information about Hawaiian culture, especially with regard to sailing canoes. The group has sponsored classes utilizing their existing sailing canoe, *Mo'o Lele*, and are in the process of constructing a second double hull sailing canoe, *Mo'o Kia*. The proposed master plan for the park improvement program is aimed at establishing a site that embodies Hawaiian heritage and culture through the incorporation of traditional Hawaiian architecture and materials. The subject application involves requesting approvals of the master plan. The use of the park by the public will be maintained; however, the site will have a much greater sense of place from a Hawaiian cultural perspective.

Regarding your request to consult with Native Hawaiians, we note that the Board of Directors of Hui O Wa'a Kaulua as well as its general membership is comprised of a number of Native Hawaiians. This project as well as the ongoing

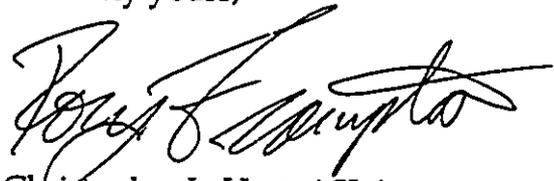
Mr. Randall Ogata and Mr. Richard Messier, Office of Hawaiian Affairs
Applications for SMA, SSV and H.D. for the Proposed Kamehameha Iki Park
Improvements at Lahaina, Maui, Hawai'i.
April 19, 1999, Page 2

programs have been developed and will be implemented by Native Hawaiians
(although not exclusively.)

2. **Native Hawaiian Gathering Rights.** Due to the site's coastal setting and lack of native vegetation, any gathering rights which may exist on the property would be related to the ocean. The property is publicly owned and use by the public will be maintained. There is currently unimpeded access to the ocean and this situation will continue. Therefore, the proposed project will not impact, impede or otherwise alter any traditional or customary gathering rights which may exist on the property.

If you have further questions, please contact Rory Frampton at 242-1955.

Sincerely yours,



Christopher L. Hart, ASLA
Landscape Architect-Planner

c: Colleen Suyama, Planning
Christine Moschetti, Hui O Wa'a Kaulua
Roz Baker, Maui County Office of Economic Development

BENJAMIN J. CAYETANO
GOVERNOR



KAZU HAYASHIDA
DIRECTOR

DEPUTY DIRECTORS
BRIAN K. MINAAI
GLENN M. OKIMOTO

STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

'98 SEP -9 P1:47

IN REPLY REFER TO

STP 8.8789

September 4, 1998

Ms. Lisa M. Nuyen
Director
Department of Planning
County of Maui
250 South High Street
Wailuku, Hawaii 96793

Dear Ms. Nuyen:

Subject: Kamehameha Iki Park Improvements
Application for Special Management Area Permit, Historic District
Approval, and Shoreline Setback Variance
I. D. No.: SM1 980019, SSV 980003, HDC 980009
TMK: 4-6-002: 010

Thank you for your transmittal requesting our comments on the subject application.

The proposed improvements to Kamehameha Iki Park will not impact our State transportation facilities.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Kazu Hayashida".

KAZU HAYASHIDA
Director of Transportation



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION
P.O. BOX 621
HONOLULU, HAWAII 96809

September 10, 1998

'98 SEP 11 12:58

AQUACULTURE DEVELOPMENT
PROGRAM
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND DIVISION
STATE PARKS
WATER RESOURCE MANAGEMENT

LD-NAV
Ref.: SM198019.RCM

Honorable Lisa M. Nuyen
Planning Director, County of Maui
Planning Department
250 S. High Street
Wailuku, Hawaii 96793

Dear Ms. Nuyen:

SUBJECT: Review : Application for Special Management Area
Permit
File No. : SM1 980019
Project : Kamehameha Iki Park Improvements
Applicant: Christopher L. Hart, on behalf of Hui O Wa'a
Kaulua
Location : Lahaina, Maui, Hawaii
TMKs : 2nd/ 4-6-02: Parcel 010

Thank you for the opportunity to review and comment on the subject Application for Special Management Area Permit for the proposed project.

The Department of Land and Natural Resources has no comment to offer on the subject matter at this time.

Should you have any questions, please feel free to contact Nicholas A. Vaccaro of the Land Division Support Services Branch at 1-808-575-0438.

Very truly yours,

Dean Y. Uchida
DEAN Y. UCHIDA
Administrator

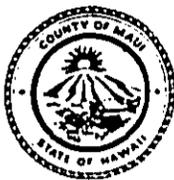
c: Maui Land Board Member
At Large Land Board Member
Maui District Land Office

LINDA LINGLE
Mayor

CHARLES JENCKS
Director

DAVID C. GOODE
Deputy Director

Telephone: (808) 243-7845
Fax: (808) 243-7955



COUNTY OF MAUI
**DEPARTMENT OF PUBLIC WORKS
AND WASTE MANAGEMENT**
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAII 96793

'98 SEP 16 P3:49

RALPH NAGAMINE, L.S., P.E.
Land Use and Codes Administration

EASSIE MILLER, P.E.
Wastewater Reclamation Division

LLOYD P.C.W. LEE, P.E.
Engineering Division

BRIAN HASHIRO, P.E.
Highways Division

Solid Waste Division

September 15, 1998

MEMO TO: LISA M. NUYEN, DIRECTOR OF PLANNING

F R O M: CHARLES JENCKS, DIRECTOR OF PUBLIC WORKS AND WASTE
MANAGEMENT *David*

SUBJECT: SPECIAL MANAGEMENT AREA PERMIT, SHORELINE SETBACK
VARIANCE, HISTORIC DISTRICT APPROVAL
KAMEHAMEHA IKI PARK IMPROVEMENTS
TMK (2) 4-6-002:010
SM1 98/019, SSV 98/003, HDC 98/009

We reviewed the subject application and have the following comments.

1. An updated "Certification of Shoreline" should be done.
2. A grading permit may be required should this project have cut or fill quantities which exceed fifty cubic yards or two feet in vertical height. In any case, erosion, sedimentation, and dust shall be controlled with Best Management Practices.
3. Off-street parking, loading spaces, and landscaping shall be provided per Maui County Code Chapter 19.36.
4. A variance may be required for the indigenous materials and construction designs of the proposed structures.
5. A variance may be required for the structure height in excess of 35 feet.

If you have any questions, please call David Goode at 243-7845.

DG:co/mt
S:\LUCA\CZM\KAMIKI.WPD



CHRIS
HART
& PARTNERS

April 20, 1999

Mr. Charles Jencks, Director
Public Works and Waste Management
County of Maui
Wailuku, Hawaii 96793

RE: Special Management Area Permit, Shoreline Setback Variance, Historic District
Approval; Kamehameha Iki Park Improvements
TMK 4-6-002:010

In response to your letter dated September 15, 1998, we offer the following comments:

1. An updated "Certification of Shoreline" has been processed through the State. A copy of the updated shoreline certification will be included in the Final Environmental Assessment.
2. It is not anticipated that the grading permit requirement will be triggered. Ground disturbances will be limited to removing existing structures and pavement. Nevertheless, erosion, sedimentation and dust will be controlled through standard best management practices for construction activities.
3. Off-street parking and loading and landscaping will be provided per the requirements of Chapter 19.36, Maui County Code. Our preliminary calculations indicate that the stall requirement will amount to 28 spaces. We foresee no problems in complying with the requirements of Chapter 19.36, MCC.
4. We will continue to work with your Department in order to determine the appropriate way to process approval of the use of indigenous materials and construction designs for the proposed buildings. Hans Riecke has agreed to assist us in this regard and will be contacting your Department to discuss this matter further.
5. At this point in time, we do not foresee building heights exceeding 35 feet. As you pointed out, we will be required to obtain a variance if the height of the buildings exceeds 35 feet.

If there are any further questions, please contact me at 242-1955.

Respectfully yours,



Rory Frampton
Project Planner

cc: Christine Moschetti, Hui O Wa`a Kaulua
Roz Baker, Office of Economic Development
Colleen Suyama, Planning Department

LANDSCAPE ARCHITECTURE AND PLANNING

1955 MAIN STREET, SUITE 200 • WAILUKU, MAUI, HAWAII 96793-1706 • PHONE: 808-242-1955 • FAX: 808-242-1956

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII



08 SEP 17 P1:07
STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF LAND MANAGEMENT
54 SOUTH HIGH STREET, ROOM 101
WAILUKU, HAWAII 96793-2198

September 16, 1998

MICHAEL D. WILSON
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES

DEPUTY
GILBERT S. COLOMA-AGARAN

AQUACULTURE DEVELOPMENT
PROGRAM
AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND
ENVIRONMENTAL AFFAIRS
CONSERVATION AND
RESOURCES ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT
WATER RESOURCE MANAGEMENT

Ms. Lisa M. Nuyen, Director
Planning Department
County of Maui
250 South High Street
Wailuku, Maui, Hawaii 96793

Dear Ms. Nuyen:

Subject: Special Management Area Use Permit and Shoreline Setback Variance for the Proposed Kamehameha Iki Park Improvements, Tax Map Key: 4-6-02: 10, Lahaina, Maui (SM 1980019, SSV 980019 and HDC 980009).

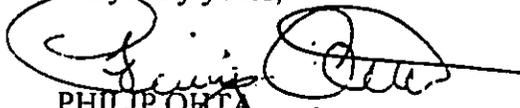
The Maui District Land Office has reviewed the subject applications for the proposed Kamehameha Iki Park improvements on land identified by Tax Map Key: 4-6-02: 10, situate in Lahaina, Maui, and has the following comments:

1. The subject land is State owned and has been set aside to the County of Maui for expansion of recreational and open space facilities (park site) by Executive Order No. 02771.
2. Section 171-11, Public purposes, lands set aside by the governor, management, of the Hawaii Revised Statutes, states, in part, that "such department, agency of the State, the city and county, county or other political subdivision of the State in managing such lands shall be authorized to exercise all of the powers vested in the board in regard to the issuance of leases, easements, licenses . . . covering such lands for such use as may be consistent with the purposes for which the lands were set aside on the same terms, conditions, and restrictions applicable to the disposition of public lands, as provided by this chapter all such dispositions being subject to the prior approval of the board . . ." Therefore, any uses other than the park site purpose by the County of Maui, whether through a lease, easement, license, agreement, etc., requires approval from the Board of Land and Natural Resources.

Ms. Lisa M. Nuyen - Kamehamcha Iki Park
September 16, 1998
Page 2

Thank you for the opportunity to comment on the subject applications. Should you have any questions regarding the above matter, please contact the Maui District Land Office at the address described on the letter head or by telephone at 984-8100.

Very truly yours,



PHILIP OHTA
Maui District Land Manager

cc: Mr. D. Y. Uchida
Mr. W. Kennison



Mr. Philip Ohta
Maui District Land Manager
Department of Land and Natural Resources
State of Hawaii
54 South High Street
Wailuku, Hawaii 96793

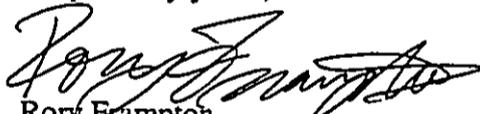
RE: Special Management Area Permit, Shoreline Setback Variance, Historic District
Approval; Kamehameha Iki Park Improvements
TMK 4-6-002:010

In response to your letter dated September 16, 1998, we offer the following comments:

1. As noted in your letter, the stated intent of Executive Order No. 02771 is for expansion of recreational and open space facilities to be under the control and management of the County of Maui. The proposed request to improve the park for the continued use of the site as a cultural park focusing on the Hawaiian sailing canoe appears to be consistent with the intent of E.O. No. 02771.
2. Hui O Wa`a Kaulua is aware that its proposed lease with the County must be approved by the State Board of Land and Natural Resources. We are currently working with the County to bring the matter before the Board. We anticipate publishing a Findings of No Significant Impact in the May 8, 1999 Environmental Notice, after which the Board may consider this item. We will keep you apprised of the status of the lease submittal.

If there are any further questions, please contact me at 242-1955.

Respectfully yours,


Rory Frampton
Project Planner

cc: Christine Moschetti, Hui O Wa`a Kaulua
Roz Baker, Office of Economic Development
Coleen Suyama, Planning Department

BENJAMIN J. CAYETANO
GOVERNOR



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

235 SOUTH BERETANIA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 586-4185
FACSIMILE (808) 586-4186

September 30, 1998

Robbie Ann Kane Guard
Maui Office of Economic Development
200 South High Street, 6th floor
Wailuku, HI 96793

RECEIVED
OCT 01 1998

CHRIS HART & PARTNERS
Landscape Architecture & Planning

Dear Ms. Kane Guard:

Subject: Draft Environmental Assessment (EA) for Kamehameha Iki Park, Lahaina

We have the following comments to offer:

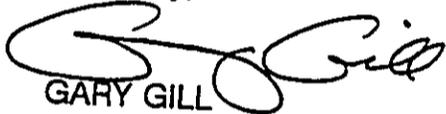
1. Two-sided pages: In order to reduce bulk and conserve paper, we recommend printing on both sides of the pages in the final document.
2. Timeframe: What are the anticipated start and end dates of this project?
3. Contacts: List state and county agencies contacted. Document all contacts in the final EA and include copies of any correspondence.
4. Water feature: A water feature is mentioned in the draft EA on page 3, but no other details are given. In the final EA provide a fuller description, including how this feature may affect this project's runoff on the site.
5. Garage/workshop: The soil beneath this existing structure may be contaminated. Indicate what mitigation measures are planned to remediate any contaminated soil and to prevent any subsequent contamination of coastal waters.
6. Construction runoff: Indicate any other mitigation measures planned to prevent construction runoff into the coastal area.
7. Landscaping: Will treated wastewater be used for landscaping irrigation?
8. Shoreline setback: The keiki hale is proposed within the shoreline setback. What alternatives have been considered in siting the keiki hale outside the

Robbie Ann Kane Guard
September 30, 1998
Page 2

setback and why have they been rejected? State law requires that structures be allowed within the shoreline setback area only if a hardship exists. Please describe any "hardship" that justifies placing a structure so close to the water. We recommend that no structures be placed in this area.

If you have any questions, please call Nancy Heinrich at 586-4185.

Sincerely,


GARY GILL

c: Chris Hart
Christine Moschetti



CHRIS
HART
& PARTNERS

April 20, 1999

Gary Gill, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Draft Environmental Assessment (EA) for Kamehameha
Iki Park, Lahaina

We offer the following responses to your comments dated September 30, 1998:

1. **Timeframe:** The first phase of the project, construction of the Keiki Hale, will be initiated in late summer 1999, as soon as all applicable approvals have been granted. Initiation of the second and third phases of the project are scheduled for the earlier and later later parts of 2000, respectively, and will be dependent upon securing construction funding.
2. **Contacts:** All contacted state and county agencies will be listed in the final EA as well as copies of correspondence.
3. **Water Feature.** The water feature has been proposed in approximately the same location of a water feature which existed during the period of Kamehameha III. It was apparently associated with the pond across the street referred to as Mokuhinia. It is envisioned that the proposed water feature would be developed as part of the anticipated restoration of Mokuhinia and Moku Ula, as part of the long terms plans developed by the Friends of Moku Ula. The feature would diminish net runoff from the site since it would hold water and have sufficient freeboard to accept rainfall.
4. **Garage /Workshop.** The existing garage/workshop slab will be utilized as the foundation for the proposed Hale Wa`a, and therefore, the soil beneath this structure will not be exposed. In the event that portions of the slab are removed, sub-surface soils will be dealt with according to regulations established

Mr. Gary Gill, OEQC
Re: Kamehameha Iki Park Draft EA
April 20, 1999
Page 2

by the State Department of Health. Cutoff ditches and/or berms will be utilized to prevent the exposed soils from entering near shore waters.

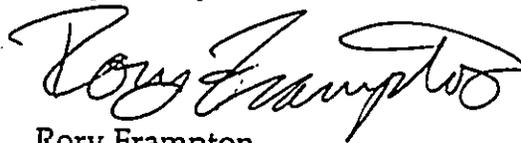
5. Construction runoff: Due to the staged nature of the project, only limited areas of the site will be exposed at any one time, and therefore, the potential for short-term impacts due to construction run-off should be minimal. Exposed areas will be re-vegetated as soon as possible and berms, ditches or other appropriate measures will be constructed to insure construction run-off does not adversely impact near shore waters.

6. Landscaping: There are no plans to use treated wastewater for landscape irrigation. In the event that the County of Maui pursues the implementation of a wastewater reuse program within Lahaina, the subject property would be a suitable site.

7. Shoreline Setback: The Keiki Hale has been situated within the shoreline setback due to the functional need for proximity to the ocean for canoe launching purposes. You are incorrect in stating that "State law requires that structures be allowed within the shoreline setback area only if a hardship exists." Section 205A-46 Hawaii Revised Statutes lists ten classes of structures or activities which may be granted variances. Only two of these classes of actions, numbers 8 and 9, require a finding of hardship. Included in the classes of actions which do not require a finding of hardship are structures necessary for or ancillary to "boating, maritime or watersports recreational facilities" (205A-46(a)(5)).

Thank you for providing comments on this Environmental Assessment. If you have any questions please do not hesitate to contact me at 242-1955.

Respectfully,



Rory Frampton
Project Planner

cc: Colleen Suyama, Maui Planning Department
Roz Baker, Maui County Office of Economic Development
Christine Moschetti, Hui Wa'a O Kaulua

LINDA LINGLE
Mayor

LISA M. NUYEN
Director

DONALD A. SCHNEIDER, II
Deputy Director



CLAYTON I. YOSHIDA
Planning Division

AARON H. SHINMOTO
Zoning Administration and
Enforcement Division

COUNTY OF MAUI
DEPARTMENT OF PLANNING

October 8, 1998

RECEIVED
OCT 13 1998

CLAYTON I. YOSHIDA
Planning Division

Mr. Rory Frampton, Project Manager
Chris Hart & Partners
1955 Main Street, Suite 200
Wailuku, Hawaii 96793

Dear Mr. Frampton:

RE: Request for Review and Comments of the Draft Environmental Assessment for Plans by Hui O Wa a Kaulua for Renovations and Improvements at Kamehameha Iki Park, 525 Front Street, TMK: 4-6-002:010, Lahaina, Island of Maui, Hawaii

On October 1, 1998, the Maui County Cultural Resources Commission (MCCRC) reviewed the Draft Environmental Assessment for the above-referenced project and has the following comments:

1. As a County park, access to the public should not be denied. Except for the building structures occupied by Hui O Wa a Kaulua, the remainder of the park should be open to the public. Consideration should also be given to opening the restroom facilities to the public during portions of the day. Also, consideration should be given to allowing the public to use the performance platform since the existing performance stage is proposed to be removed;
2. Assurances should be included that should the nonprofit organization Hui O Wa a Kaulua dissolve, then someone should be responsible for the completion or management of the project;

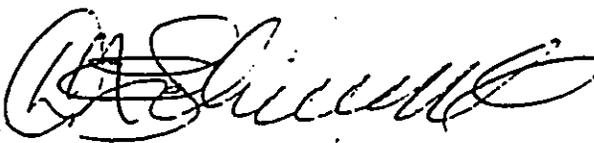
Mr. Rory Frampton, Project Manager
October 8, 1998
Page 2

3. Onsite archaeological monitoring of the site shall be made during removal of any structures or pavement and during any subsurface disturbances. In the event any cultural or historic remains are discovered during construction, work shall cease in the immediate area and appropriate measures taken prior to the resumption of work;
4. Redevelopment of Kamehameha Iki Park shall include interpretation of the significance of the Kamehameha Iii period to the site. The plans for interpretation of the site should be reviewed by the MCCRC;
5. Relative to the "Keiki Hale," consideration shall be given to placing the ungrouted rock walls on the ground surface of the site and eliminating any ground excavation for wall footings. The wood poles can be set into the walls which are recommended to be at least four feet high to ensure structural stability. Further, the A-frame structure should be retained with the height of the structure increased and the roof thatching ending higher up from the ground to allow for ventilation and light. The A-frame is considered your traditional canoe hale. Also, consideration should be given to increase the width of the structure from 20 ft. to 24 ft. to allow adequate working space within the A-frame structure;
6. Regarding the larger building (Hui Wa a), the MCCRC voiced concern that the meshing of contemporary architecture with traditional Hawaiian architecture is very difficult and not very successful. Reconsideration should be given to the design of the larger building prior to submittal back to the MCCRC for approval; and
7. The MCCRC pointed out that the proposed placement of the fishing shrine may conflict with the operation of the canoe haies. The transfer of canoes between the haies and ocean may be impacted by the location of the shrine.

Mr. Rory Frampton, Project Manager
October 8, 1998
Page 3

Thank you for the opportunity to comment. If additional clarification is required, please contact Ms. Colleen Suyama, Staff Planner, of this office at 243-7735.

Sincerely,


for LISA M. NUYEN
Director of Planning

LMN:CMS:osy

c: MCCRC

Clayton Yoshida, A.I.C.P., Planning Program Administrator

Colleen Suyama, Staff Planner

Christine Moschetti, Hui O Wa a Kaulua

Department of Housing and Human Concerns

Department of Parks and Recreation

Project File

General File

(S:\CMS\98sm119k)



CHRIS
HART
& PARTNERS

April 19, 1999

Mr. John E. Min, Director
Department of Planning
County of Maui
250 South High Street
Wailuku, Hawaii 96790

Dear Mr. *John* Min:

Re: Response to Comments by the Maui County Cultural Resources Commission (MCCRC) on the Draft Environmental Assessment for the Kamehameha Iki Park Improvements by Hui O Wa`a Kaulua, 525 Front Street, Lahaina, Island of Maui, Hawaii
TMK: 4-6-002:010

In response to comments received during the MCCRC meeting of October 1, 1998, and as enumerated in your letter dated October 8, 1998, we offer the following responses:

1. Public access to the park will not be denied. For security purposes, public access to existing and future buildings on the property will be controlled by Hui O Wa`a Kaulua. The remainder of the park will be open for public use and will be controlled and managed by the County of Maui Department of Parks and Recreation.
2. In the unlikely event that Hui O Wa`a Kaulua should dissolve, the Department of Parks and Recreation would be responsible for completion or management of the project. It should be noted that at present Hui O Wa`a Kaulua has a very active membership, a full-time executive director and a strong Board of Directors.
3. As presented at the meeting, archaeological monitoring will take place during removal of structures or pavement or any other activity which results in sub-surface disturbances. In the event that any cultural or historic remains are

Mr. John E. Min, Planning Department
Re: Kamehameha Iki Park Draft EA
April 19, 1999, Page 2

discovered during construction, work shall cease in the immediate areas and appropriate measures taken prior to resumption of work, including contact with the State Historic Preservation Division.

4. Plans for interpretative displays regarding the activities associated with Kamehameha III which occurred at the site involve two formats. The first would be a separate standalone display with graphics and a narrative. The second would be a more detailed display within the education center. We have no objection to a condition which would require review of final interpretative display plans by the MCCRC.

5. Plans for the hale (identified as the Keiki Hale) have been revised by raising the ungrouted rock walls and minimizing ground excavation for wall footings. Additionally, the walls will be at least four feet wide to ensure structural stability and the width of the structure will be expanded to twenty-four feet (see enclosed drawing).

6. The plans for Hale Wa`a include utilizing traditional Hawaiian materials in order to maintain a unified theme for the park. We feel it is important to maintain a consistent style of architecture, especially given the goal of creating a site which embodies Hawaiian heritage and culture. We acknowledge the concerns expressed regarding the difficulty of meshing contemporary architecture with traditional architecture. The intent is to utilize traditional materials on the exterior of the building and to recess items such as doors or gates to the maximum extent practical. A good example of representative architecture is found at the recently completed Old Lahaina Luau, across the street from the Lahaina Cannery Mall.

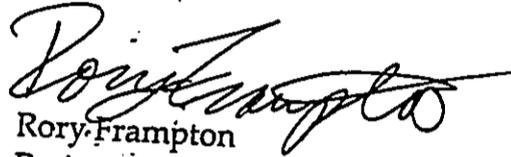
While the size, shape and function of Hale Wa`a are defined, further refinement of the architectural details will take place during the construction drawing phase. We feel that sufficient detail has been provided for purposes of the subject Environmental Assessment and Special Management Area Permit request. We also agree that future input and or approval by the Cultural Resources Commission of the architectural details would be appropriate. Therefore we would not object to a condition requiring future review of the architectural aspects of Hale Wa`a by the CRC.

7. The fishing shrine location has been moved so that it will not conflict with the operation of the canoe hale.

Mr. John E. Min, Planning Department
Re: Kamehameha Iki Park Draft EA
April 19, 1999, Page 3

Thank you for providing us with written comments from the MCCRC. The Final EA will be amended appropriately. If you have any further questions, please do not hesitate to contact me at 242-1955.

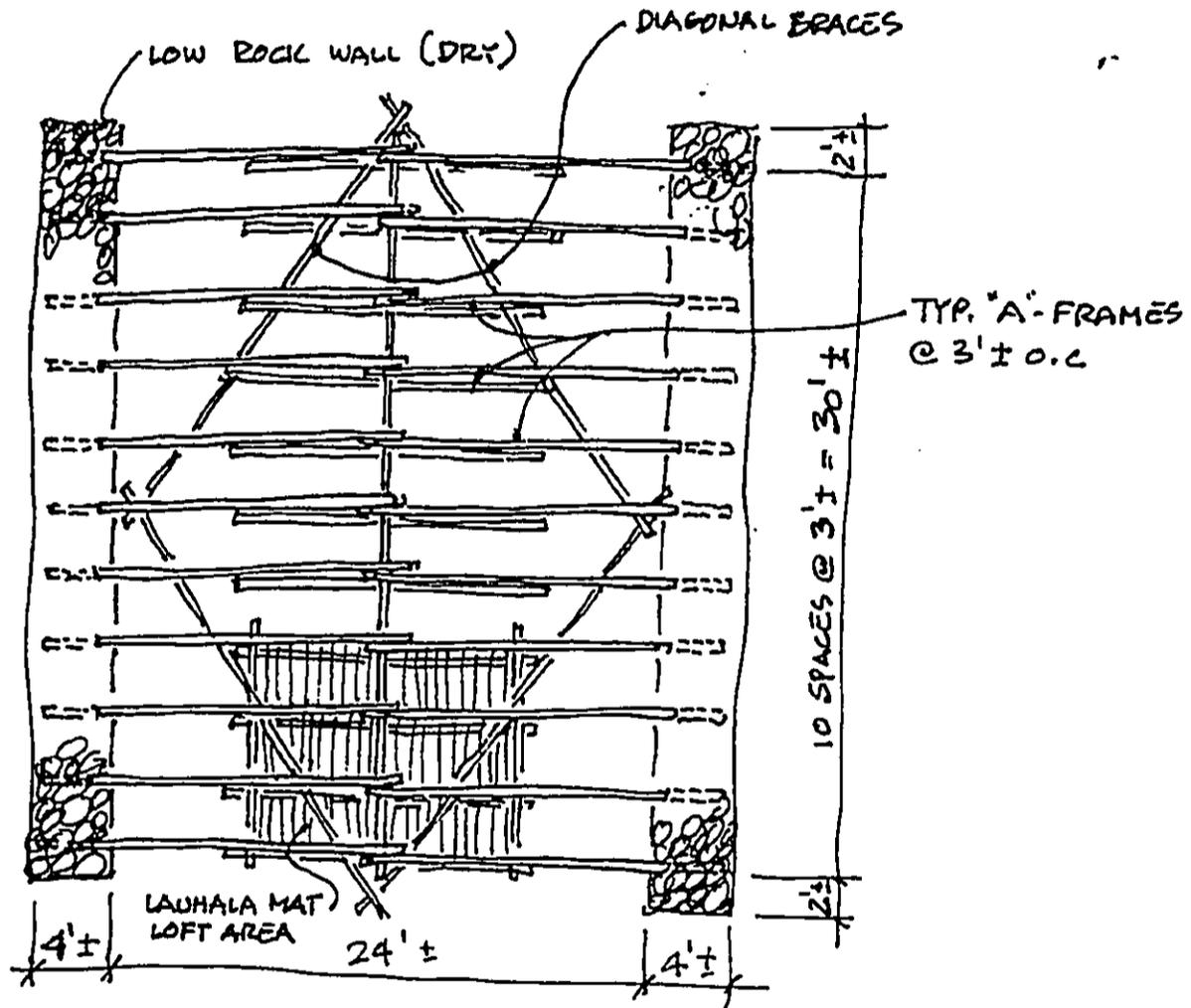
Respectfully yours,


Rory Frampton
Project Planner

cc: Christine Moschetti, Hui O Wa`a Kaulua
Roz Baker, Maui County Office of Economic Development

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CHRIS HART & PARTNERS
Landscape Architecture & Planning

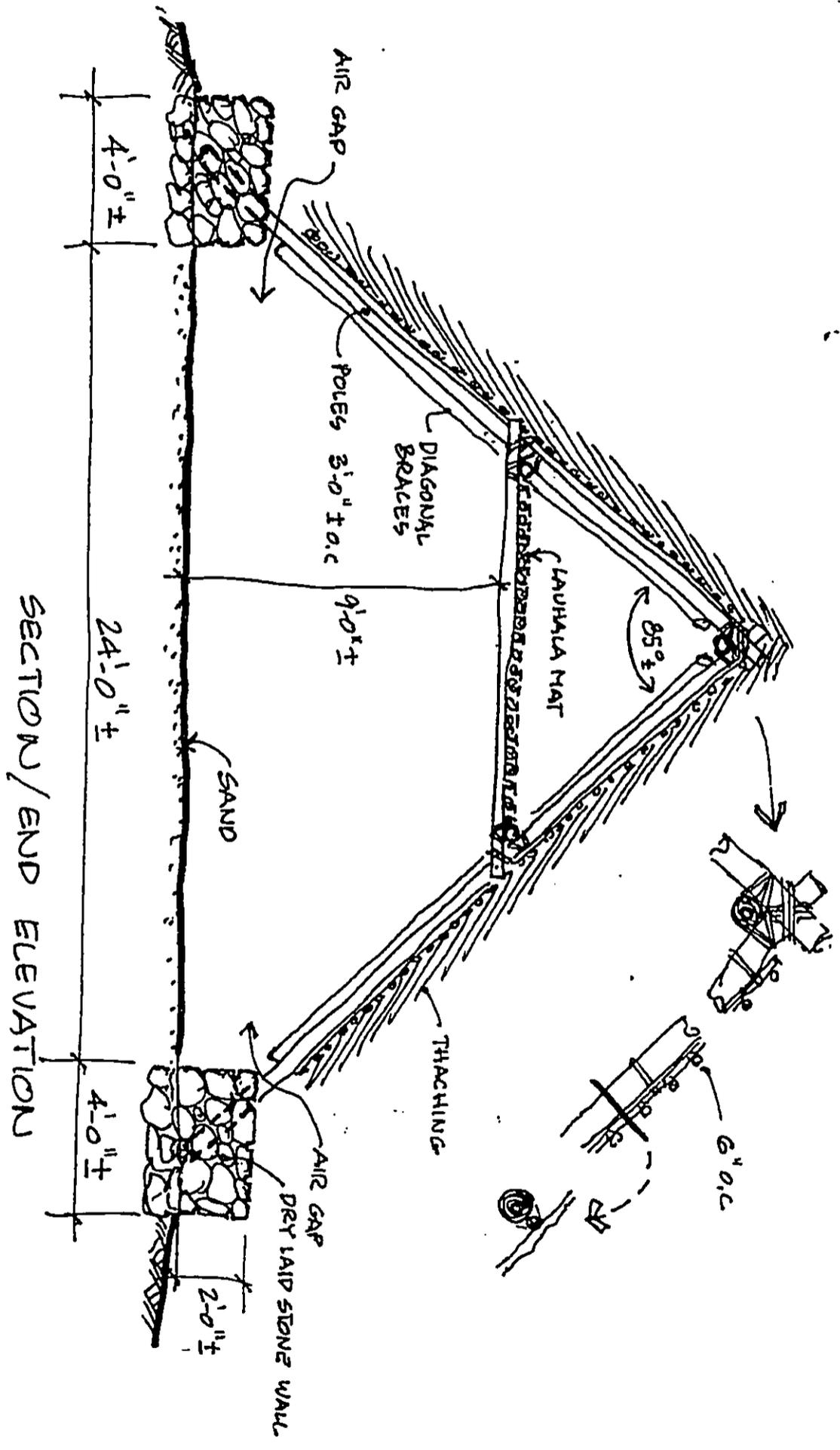


PLAN 1/8" = 1'-0" ±

HAWAIIAN CANOE HALE

HR

HAWAIIAN CANOE HALE
1/4" = 1'-0"
RD



②

UH Sea Grant Extension Service
Maui Community College
310 Kaahumanu Ave.
Kahului, HI 96732
October 15, 1998

County of Maui
Department of Planning
250 South High Street
Wailuku, HI 96793
Attn: Colleen Suyama, Staff Planner

**Re: Draft Environmental Assessment for Special Management Area Use Permit
and Shoreline Setback Variance for Kamohameha Iki Park, Lahaina, Maui
(TMK: 4-6-02:10)**

Dear Ms. Suyama:

I have reviewed the draft environmental assessment for proposed activities at the Kamohameha Iki Park. I agree with the applicant that these proposed activities will greatly enhance the appearance, functionality, and cultural sense of place of the existing park, but I have a few concerns that ought to be addressed to make the proposed actions more consistent with wise beach management practices.

The Keiki Hale is proposed to be partially located within the shoreline setback area. Its makai boundary is stated to be 25 feet from the current (?) shoreline. This may or may not constitute an unreasonable risk that the structure will be damaged by coastal erosion; this depends on how dynamic the position of the shoreline is. Some sandy shorelines are relatively stable, and some are very dynamic. The applicant claims that the position of the shoreline has been relatively stable between some time in the 1970s and 1985, but there is no documentation of this stability nor is there any data on changes in the position of the vegetation line since 1985.

Without data on historical shoreline changes, no evaluation of the erosion risk to this structure can be made. An assessment of historical shoreline changes can be made after one or both of the following:

1. A map comparatively documenting the location of all available shoreline certifications (including a 1998 certified shoreline)
2. An aerial photographic analysis of coastal erosion rates documenting changes in the shoreline from ~1950 to 1997 or 1998.

The results of such a study should be included in the Final Environmental Assessment and summarized in the response statement to section E. Special Management Area, Item #6 on coastal hazards (p. 32). Currently, this response only addresses tsunami and flood hazards; no mention is made of coastal erosion and storm wave hazards.

The intended use of the Keiki Hale as a storage for canoes and the light style of construction makes it consistent with the guidelines for acceptable activities in the shoreline setback area in both the Shoreline Setback Rules and the *Beach Management Plan for Maui*. On page 34 of the draft EA, the applicant states that the Keiki Hale will be removed and relocated if "beach retreat compromises the structure's footings." This should be restated in item #11 of section F. Environmental Assessment Significance

Ms. Colleen Suyama
October 15, 1998
Page 2

Criteria (p. 37) and in item #3 of section G. Shoreline Setback Variance Rules (p. 38). it is imminently threatened by coastal erosion.

Thank you for the opportunity to comment on this draft environmental assessment. I hope these concerns can be addressed in the final environmental assessment. If you require any clarification or additional information, please call me at 984-3254 or fax me at 242-8733.

Sincerely,



Robert A. Mullane
Maui County Regional Coastal Processes Agent



CHRIS
HART
& PARTNERS

April 21, 1999

Robert A. Mullane
Maui County Regional Coastal Processes Agent
UH Sea Grant Extension Service
Maui Community College
310 Kaahumanu Ave.
Kahului, HI 96732

Re: Draft Environmental Assessment for Kamehameha Iki Park Improvement Project

Dear Mr. Mullane:

In response to your letter dated October 15, 1999 we offer the following responses.

1. Shoreline Data. In response to your request, the applicant had a shoreline survey conducted for the property. The shoreline was certified by the State of Hawaii in January of this year, the official certified map was transmitted to the applicant in March of this year. We have included a copy of the 1999 certified shoreline in the Final Environmental Assessment (EA). We have also prepared a composite map indicating the position of the shoreline in 1975, 1985 and 1998.

With regards to your request for an aerial photographic analysis of coastal erosion/accretion rates, Sea Engineering performed a Statewide aerial photographic analysis of coastal erosion/accretion rates in 1991, as you are well aware. Unfortunately, the study did not encompass the subject property. In 1994, however, as part of a study on the potential impacts of the installation of Drainline "F", Sea Engineering and AECOS performed a coastal engineering and marine environment investigation. The location of Drainline "F" is approximately 300 feet north of the subject property and much of their data collection and analysis is relevant to understanding shoreline conditions at the subject property.

In general, the historical aerial photographic analysis conducted by Sea Engineering/AECOS indicated that the beach width fronting Drainline "F" has been dynamic over time, with a reduction in beach width noted in 1994 as well as at present. The authors noted that from observations of the wave reflection and severe water agitation in front of the seawalls on either side of Drainline "F", that it is tempting to blame the walls for the eroded state of the beach which was present in 1994. "However, the sea walls can be seen in photographs as far back as 1954, and while they probably slow the beach building process, it is apparent that there are beach erosion and accretion cycles that are independent of their presence."

While the beach fronting the seawalls to the north have been quite variable, the 1994 review noted the presence of a sandy beach in front of the beach park in every photograph which was examined. This study did not suggest a trend of shoreline retreat or beach width reduction fronting the park since 1954. Historic accounts indicate that there have been numerous structures on this property since the 1840s. While a couple of these structures

Mr. Robert A. Mullane
RE: Kamehameha Iki Park
April 23, 1999
Page 2

have been damaged by wind storms there appeared to be no significant structure damage due to shoreline erosion.

The composite diagram with shoreline positions at the subject property illustrates shoreline fluctuation over the last 24 years. Between 1975 and 1985 the certified shoreline position moved approximately 15 feet seaward (west). The 1998 shoreline varies, but on average is approximately mid-way between the 1975 and 1985 positions. It should be noted that these variations in positions could be due to difference in surveying practices or standards over time or the highly variable nature of the vegetation at this site. Grass along this section of the shoreline is heavily influenced by irrigation practices and/or weather patterns (e.g. droughts.)

Based on the information contained in the Sea Engineering /AECOS study, historical uses and recent shoreline surveys, it appears that there is a low risk of severe erosion retreat occurring at the site. Nevertheless, the applicant acknowledges the imprecise nature of predicting shoreline erosion/accretion rates and as such has taken a position that if beach retreat compromises the structure's footings, then all or part of the structure would be moved further mauka (east).

We will include a more detailed description of the shoreline and off-shore environment in the Final EA, along with the composite shoreline map and the updated 1998 shoreline certification. (Copies of the new figures and the complete description is enclosed.) In addition we will include a response statement on coastal hazards relative to coastal erosion. We will also restate the statement regarding moving the structure in the sections you requested.

Thank you for your comments, if you have any further questions or comments please do not hesitate to contact me at 242-1955.

Respectfully yours,


Rory Frampton
Project Planner

cc: Christine Moschetti, Hui O Wa`a Kaulua
Roz Baker, Maui County Office of Economic Development
Colleen Suyama, Planning Department