

**ENGINEERING DIVISION**  
DEPARTMENT OF WATER, COUNTY OF KAUA'I  
JASON F. KAGIMOTO, P.E.

**Job No. 02-06**  
**Appendix L.2**  
**SHPD**

*Water has no substitute..... Conserve it*



**JOSEPH E. TAIT**  
MANAGER AND CHIEF ENGINEER

**MICHAEL K. HINAZUMI, P.E.**  
DEPUTY MANAGER-ENGINEER

June 2, 2025

Jessica L. Puff, Administrator  
State Historic Preservation Division  
Department of Land and Natural Resources  
State of Hawai'i  
601 Kamokila Blvd., Suite 555  
Kapolei, Hawai'i 96707  
Submitted Via HICRIS

**Subject: Hawai'i Revised Statutes, Chapter 6E-8**  
**County of Kaua'i, Department of Water's Kilauea 466' Water Tank Project**  
**West Waiakalua Ahupua'a, Ko'olau Moku, Kaua'i, Hawai'i**  
**TMK Nos. 5-1-005:131, 5-1-005:124 (portion), and 5-2-005:054 (portion)**

Dear Ms. Puff:

The County of Kaua'i, Department of Water (KDOW) is proposing to construct and operate the Kilauea 466' Water Tank Project, located in West Waiakalua Ahupua'a, Ko'olau Moku, Kaua'i, Hawai'i, on TMK Nos. 5-1-005:124, 5-1-005:131, and 5-2-005:054 (Attachments 1 and 2). The use of County funds and land triggers Hawai'i Revised Statutes (HRS), Chapter 6E requirements, specifically HRS § 6E-8. The following sections provide the proposed project information, and we request your concurrence with our HRS Chapter 6E determination of **no historic properties affected**.

### **Project Description**

KDOW is proposing to replace an existing 0.1-million-gallon (MG) water storage tank with a 1.0 MG tank. The proposed project will be built at an existing KDOW facility on TMK No. 5-1-005:131 in West Waiakalua Ahupua'a, Ko'olau District, Kaua'i, Hawai'i (Attachment 1). The project is being proposed by KDOW as part of ongoing system improvements to the Kilauea-Waipake-Kalihiwai service area. Planning Solutions, Inc. (PSI) prepared the Final Environmental Assessment and Finding of No Significant Impact (FEA-FONSI) for the subject project, which was published on October 8, 2024, and can be accessed at

[https://files.hawaii.gov/dbedt/erp/Doc\\_Library/2024-10-08-KA-FEA-Kilauea-466-Water-Tank-Project.pdf](https://files.hawaii.gov/dbedt/erp/Doc_Library/2024-10-08-KA-FEA-Kilauea-466-Water-Tank-Project.pdf).

The site is in the State's and County's Agricultural District/Zone, off of Wailapa Road, in the Pu'u Pane subdivision, at an elevation of approximately 460 feet above sea level (Attachment 2).

The project's scope and area of disturbance are summarized in Table 1.

**ENGINEERING DIVISION**  
**DEPARTMENT OF WATER, COUNTY OF KAUA'I**  
**JASON F. KAGIMOTO, P.E.**



**JOSEPH E. TAIT**  
 MANAGER AND CHIEF ENGINEER

**MICHAEL K. HINAZUMI, P.E.**  
 DEPUTY MANAGER-ENGINEER

Jessica L. Puff  
 Subject:

Hawai'i Revised Statutes, Chapter 6E-8; County of Kaua'i, Department of Water's Kilauea 466' Water Tank Project; West Waiakalua Ahupua'a, Ko'olau Moku, Kaua'i, Hawai'i; TMK Nos. 5-1-005:131, 5-1-005:124 (portion), and 5-2-005:054 (portion)

June 2, 2025  
 Page 2

**Table 1: Scope and Area of Disturbance**

TMK No.	Project Activity	Ground Disturbance
5-1-005:131	<ul style="list-style-type: none"> <li>Demolition and removal of existing 0.1 MG tank, which was built in the late 90s.</li> <li>Construction of new 1.0 MG tank.</li> </ul>	<ul style="list-style-type: none"> <li>Grubbing and grading tank site, a total area of roughly 22,869 square feet (0.525 acre).</li> <li>Excavation of 3,000 cubic yards (c.y.) of soil; 2,000 c.y. will be reused onsite.</li> </ul>
5-1-005:124 (portion)	<ul style="list-style-type: none"> <li>Construction staging.</li> <li>Construction of a new access driveway.</li> </ul>	<ul style="list-style-type: none"> <li>Temporary staging. No excavations will be performed.</li> <li>Grubbing of vegetation in the 10-foot-wide ROE area, disturbing approximately 1,025 square feet. ROE area will be relandscaped once work is complete.</li> <li>Minor grading associated with access drive approximately 20 feet wide and 275 feet long.</li> </ul>
5-2-005:054 (portion)	<ul style="list-style-type: none"> <li>Construction staging and stockpiling.</li> </ul>	<ul style="list-style-type: none"> <li>Temporary staging and stockpiling of 3,000 c.y. of excavated material. No excavations will be performed.</li> </ul>

Source: Compiled by Planning Solutions, Inc.

**Project Area**

The Project Area for the Kilauea 466' Water Tank Project consists of two distinct areas (Attachment 3). The first area is roughly 1.28 acres and consists of the Kilauea 466' Water Tank Project site, located on TMK No. 5-1-005:131, and the adjacent right-of-entry (ROE) area and new access drive located on a portion of TMK No. 5-1-005:124. The second area is a 0.89-acre portion of TMK 5-2-005:054 that will be used for temporary staging and stockpiling; this parcel is known as the Kilauea Town Expansion Site, which is also owned by the County of Kaua'i. In total, the Project Area is roughly 2.17 acres.

**ENGINEERING DIVISION**  
**DEPARTMENT OF WATER, COUNTY OF KAUA'I**  
**JASON F. KAGIMOTO, P.E.**



**JOSEPH E. TAIT**  
MANAGER AND CHIEF ENGINEER

**MICHAEL K. HINAZUMI, P.E.**  
DEPUTY MANAGER-ENGINEER

Jessica L. Puff  
Subject:

Hawai'i Revised Statutes, Chapter 6E-8; County of Kaua'i, Department of Water's Kilauea 466' Water Tank Project; West Waiakalua Ahupua'a, Ko'olau Moku, Kaua'i, Hawai'i; TMK Nos. 5-1-005:131, 5-1-005:124 (portion), and 5-2-005:054 (portion)

June 2, 2025  
Page 3

### **Identification of Historic Properties**

At KDOW's request, Honua Consulting conducted an Archaeological Field Inspection (AFI) for the Kilauea 466' Water Tank Project, the results of which are summarized in their report dated June 6, 2024. The AFI addressed TMKs 5-1-005:124 (portion) and 131. The report was submitted to SHPD for review. Honua's study was conducted according to standards outlined in HAR § 13-276 and was intended to assist with the project's compliance with HRS § 6E and consultation with the State Historic Preservation Division (SHPD). Both the AFI and a Cultural Impact Assessment were appended to the project's FEA-FONSI.

No archaeological surface features, cultural materials, or anything else of historic significance were encountered by Honua Consulting on TMKs 5-1-005:124 and 131. This is likely due to the development of the area for commercial sugarcane cultivation and subsequent construction of the West Waiakalua Agricultural Subdivision and the existing water tank facility.

The portion of the APE on TMK 5-2-005:054 was recently added to the project and was not discussed in detail in the FEA-FONSI. The conditions at TMK 5-2-005:054 are similar to the tank site in that the land has been extensively modified for commercial sugarcane cultivation. The area is a grassy field with a few trees and no surface features.

No historic properties are known to be present in either of the two Project Areas shown in Attachment 3.

### **Determination and Request for Concurrence**

Based on the above, KDOW is making a project determination of "no historic properties affected" per HAR § 13-275-7(a)(1). This determination is based on project conditions and the absence of any known historic properties in the immediate vicinity of the project activities. We are seeking SHPD's concurrence with this project determination and associated conditions. Per HRS 6E-8(a), should SHPD not respond within 90 days, the project will proceed with KDOW's determination and the included conditions.

Please contact Mr. Jim Hayes of Planning Solutions, Inc. at (808) 550-4538 or [jim@psi-hi.com](mailto:jim@psi-hi.com) if you have any questions.

Sincerely,

*Jason Kagimoto*

Jason Kagimoto, P.E  
Acting Engineering Division Head  
Engineering Division

JK/jrp

**JOSH GREEN, M.D.**  
GOVERNOR | KE KIA'ĀINA

**SYLVIA LUKE**  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'**  
**DEPARTMENT OF LAND AND NATURAL RESOURCES**  
**KA 'OIHANA KUMUWAIWAI 'ĀINA**

STATE HISTORIC PRESERVATION DIVISION  
KAKUHIHEWA BUILDING  
601 KAMOKILA BLVD, STE 555  
KAPOLEI, HAWAII 96707

**DAWN N.S. CHANG**  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**RYAN K.P. KANAKA'OLE**  
FIRST DEPUTY

**CIARA W.K. KAHAHANE**  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

July 31, 2025

Jason F. Kagimoto, P.E.,  
Acting Engineering Division Head  
County of Kaua'i, Department of Water  
4398 Pua Loke Street  
Līhu'e, HI 96766  
c/o Scott Suga  
Email: sisuga@kauaiwater.org

IN REPLY REFER TO:  
Project No. 2025PR00196  
Doc. No. 2507AM21  
Archaeology

Gaudencio C. Lopez, P.E.  
Branch Chief  
State of Hawai'i, Department of Health  
Safe Drinking Water Branch  
Uluakupu Building 4  
2385 Waimano Home Road, Suite 110  
Pearl City, HI 96782-1400  
Email: judy.hayducsko@doh.hawaii.gov

Dear Jason F. Kagimoto and Gaudencio C. Lopez:

**SUBJECT: Hawaii Revised Statutes (HRS) Chapter 6E-8 Historic Preservation Review and National Historic Preservation Act (NHPA) Section 106 Consultation – State of Hawai'i, Department of Health, Safe Drinking Water Branch County of Kaua'i Department of Water, Engineering Division Kīlauea 466' Water Tank Project, Job No. 02-06, WKK-15 Request for Concurrence with an Effect Determination West Waiakalua Ahupua'a, Ko'olau District, Island of Kaua'i TMK: (4) 5-1-005:124 por. and 131; and (4) 5-2-005:054 por.**

This letter provides the State Historic Preservation Division's (SHPD's) review of the County of Kaua'i, Department of Water (DOW), Engineering Division's request for concurrence with an HRS §6E-8 effect determination and the State of Hawai'i, Department of Health (DOH), Safe Drinking Water Branch's request for concurrence with an NHPA Section 106 effect determination for the Kīlauea 466' Water Tank Project. The State Historic Preservation Officer (SHPO) previously reviewed the project and provided the county's consultation information in a letter dated May 8, 2025 (Project No. 2025PR00196, Doc. No. 2505AM02). Subsequently, SHPD received three additional project submissions. On June 2, 2025, SHPD received maps of the project area and a letter from the County of Kaua'i DOW requesting SHPD's concurrence with an HRS §6E-8 effect determination of "No historic properties affected" (Submission No. 2025PR00196.002). SHPD received a duplicate of this submission on June 27, 2025 (Submission No. 2025PR00196.003). SHPD received the third submission on July 3, 2025, which included maps of the project area, an archaeological field inspection letter report (DiVito, June 2024), an environmental notice dated October 23, 2024, copies of consultation letters sent to Native Hawaiian Organizations (NHOs), a letter from the U.S. Environmental Protection Agency (EPA) delegating authority to the DOH to conduct NHPA Section 106 consultation with the SHPO on their behalf, and a letter from DOH requesting the SHPO's concurrence with an NHPA Section 106 effect determination of *no historic properties affected*.

The proposed KDOW project will receive funding from the EPA, through a State of Hawai'i Department of Health, Safe Drinking Water Branch, Drinking Water State Revolving Fund (DWSRF) loan. The project is a federal undertaking as defined in 36 CFR 800.16(y) and is subject to compliance with Section 106 of the NHPA. The project is also subject to historic preservation review under HRS §6E-8 as it is proposed by a state agency.

The County of Kaua'i DOW proposed the Kīlauea 466' Water Tank Project within a 2.17-acre project. The Federal area of potential effect (APE) and the HRS §6E project area are synonymous. The project will require ground disturbing work for the demolition and removal of the existing 0.1 MG concrete water storage tank and subsequent installing a new 1.0 MG water storage tank with a new concrete foundation, swale, and ancillary interconnections to the Kīlauea-Waipake-Kalihiwai water service area. The project also will include the removal of a portion of an existing fence line and vegetation. See the Attachment below for description of proposed ground disturbing work associated with this project.

Honua Consulting conducted an archaeological field inspection of Parcel 131 on July 27, 2023. The Final Environmental Assessment (EA) for the project includes a copy of the archaeological field inspection letter report (DiVito, June 2024). The report includes a summary of historic land use practices that have occurred within the APE/project area and indicates no historic properties were identified on the parcel during the field inspection. Aerial photos and historic maps show the APE/project area has been previously impacted by historic agricultural practices.

Based on the information provided, **the SHPO concurs** with the EPA and DOH's effect determination of *no historic properties affected* pursuant to 36 CFR 800.4(d)(1).

Additionally, **SHPD concurs** with County of Kaua'i DOW's determination of "No historic properties affected" for the current project. Pursuant to HAR §13-275-7, when the SHPD agrees that the action will not affect significant historic properties, this is the SHPD's written concurrence, and the historic preservation review ends. The HRS §6E historic preservation review process has ended. The permitting and/or project initiation process may continue.

**Please annotate on the construction plans:** In the unlikely event that subsurface historic resources, including human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes are identified during the demolition and/or construction work, cease work in the immediate vicinity of the find, protect the find from additional disturbance, and contact the State Historic Preservation Division, at (808) 692-8015.

County of Kaua'i DOW, DOH, and EPA are the offices of record for this undertaking. Please maintain a copy of this letter with your environmental review record for this undertaking.

Contact Susan A. Lebo, Archaeology Branch Chief, at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov), for any matters regarding archaeological resources or this letter.

Aloha,



Dawn N. S. Chang, Esq.  
DLNR Chairperson  
State Historic Preservation Officer

cc: Juanita Licata, [licata.juanita@epa.gov](mailto:licata.juanita@epa.gov)  
Clarice Olson, [olson.clarice@epa.gov](mailto:olson.clarice@epa.gov)  
Renee Yadao, [ryadao@kauaiwater.org](mailto:ryadao@kauaiwater.org)  
Jason Kagimoto, [jkgagimoto@kauaiwater.org](mailto:jkgagimoto@kauaiwater.org)  
Bill Eddy, [bill@kodani.com](mailto:bill@kodani.com)  
Mākena White, [makena@psi-hi.com](mailto:makena@psi-hi.com)  
Jim Hayes, [jim@psi-hi.com](mailto:jim@psi-hi.com)  
DWSRF Program, [DOH.DWSRF@doh.hawaii.gov](mailto:DOH.DWSRF@doh.hawaii.gov)  
Dale Cua, [dcua@kauai.gov](mailto:dcua@kauai.gov)  
Devin Donaldson, [devin.donaldson.nsw@doh.hawaii.gov](mailto:devin.donaldson.nsw@doh.hawaii.gov)  
David Buckley, [David.Buckley@hawaii.gov](mailto:David.Buckley@hawaii.gov)

**Attachment:** Scope of work and proposed ground disturbing work.

TMK Number	Project Activity	Ground Disturbance
(4) 5-1-005:131	<ul style="list-style-type: none"> <li>• Demolition and removal of existing 0.1 MG tank.</li> <li>• Construction of new 1.0 MG tank.</li> <li>• Grubbing and grading.</li> </ul>	<ul style="list-style-type: none"> <li>• Grubbing and grading tank site, a total area of roughly 22,869 square feet (0.525 acre).</li> <li>• Demolition and removal of 0.1 MG tank.</li> <li>• Excavation of 3,000 cubic yards (CY) of material; 2,000 CY will be reused onsite.</li> <li>• Construction of new 1.0 MG tank</li> </ul>
(4) 5-1-005:124	<ul style="list-style-type: none"> <li>• Construction staging and access.</li> </ul>	<ul style="list-style-type: none"> <li>• Grubbing of vegetation in the 10-foot-wide ROE area, disturbing approximately 1,025 square feet. ROE area will be relandscaped once work is complete.</li> <li>• Construction of alternative access drive, approximately 20 feet wide and 275 feet long.</li> </ul>
(4) 5-2-005: 056	<ul style="list-style-type: none"> <li>• Staging and stockpiling</li> </ul>	<ul style="list-style-type: none"> <li>• Temporary staging and stockpiling of 3,000 CY of excavated material. No excavations will be performed.</li> </ul>