



**STATE OF HAWAII**  
**OFFICE OF HAWAIIAN AFFAIRS**  
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HRD09/3254 F

September 8, 2009

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Federal Highway Administration  
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**RE: Section 106 Consultation for the Pedestrian/Bike Path, Wailua Ahupua'a, Puna District, Kaua'i**

Aloha e Pat Phung,

The Office of Hawaiian Affairs (OHA) has been substantively reviewing the aforementioned project and reviewing previous recommendations from our office, to include recommendations made by OHA staff in 2004 during an on-site visit to the affected area of Wailua. We thank you for your patience and the patience of other agencies who have been involved in the planning and implementation of many inter-related initiatives in and around this important spiritual center of the Native Hawaiian community. Great care and serious contemplation have surrounded our office's review and recommendations regarding any project likely to have an adverse impact to ke 'ano o ka nohona o Wailua, the way of life at Wailua.

The Hikinaakalā Heiau complex and associated Wailua petroglyph site (sites 50-30-08-105 and 105A; sites on the National Register and part of the Wailua Complex of Heiau National Historic Landmark) as well as Kukui Heiau (site 50-30-08-108) which is listed on the National Register of Historic Places, and Pu'uhonua o Hauola, are just part of a larger traditional cultural landscape which maintains a profound sacred place in our Hawaiian culture.

Aside from at least seven major heiau currently known, the entire Wailua region, from the river mouth, to the Nonou ridgeline and Mauna Kapu, form Wailuanuilani, also known as

Wailuanuiho'āno, an extremely historically sacred traditional Native Hawaiian landscape. The shoreline, and the sacred sands of 'Aliō where the first male, Kumuhonua and first female, Lalohonua, in the Kaua'i royal genealogies were created, to the sands of Mahunaone, where the beloved iwi of our beloved ali'i were carefully, ceremoniously and mournfully wrapped in the finely scented kapa reserved only for them, to the highest reaches of the wao akua, where Mauna Kapu rises as a kia'i for preserving all things Hawaiian, the importance of the Wailua area can not be emphasized enough.

In 2004, OHA staff at the time, including our Kaua'i Island Community Resource Coordinator, LaFrance Kapaka-Arboleda, along with some other beneficiaries, conducted a walk-through with regards to a less destructive placement of the proposed pedestrian and bicycle path which was envisioned to be placed in the area with several alternate routes available.

At the time of the consultation with OHA, the issue of the numerous unmarked burial sites discovered at the Coco Palms Resort and the high sensitivity of the area, in relation to other adjacent sacred sites, led to a preference at the time for a makai alignment. This was based upon limited information available at the time and a good faith effort to provide solutions which were seen as the lesser of two choices of potential harm.

However, since that time of OHA's initial recommendation, much has occurred in the Native Hawaiian community with regards to the understanding of the significant relationship of the various components of the traditional cultural landscape of the ancestors. Our duty to mālama all aspects of these wahi kapu, wahi pana and wahi kūpuna, and the direct connection to those living today is to improve the lives of the mo'opuna, and na mamo o Hawai'i, all future generations.

The significance of Heiau Holoholokū and the Pōhaku Ho'ohānau, under Mauna Kapu, is now thought to be connected to Mauna Kapu in Palehua on O'ahu, Heiau Ho'olonopahu, and the Pōhaku Ho'ohanau at the sacred ali'i birthing site of Kūkaniloko. Just as the two kupua, or spiritual women, flew from Wailua to Kūkaniloko, in the mo'olelo of Līhu'e on O'ahu, to turn into the healing stones, the connections between the wahi kapu of the different islands are reawakening. Concern for preserving the sanctity of Wailua has come from a wide and diverse group of our beneficiaries representing many different islands.

Native practitioners, such as those of Kilokilo Poepoe, who understand the layout of the Hawaiian Universe in the heavens and stars, find the connections between the great chief Wailuanuiaho'ano, born in 'Ewa on O'ahu, and the prophetic waters of Waiwānānā which flow from Palehua, near Mauna Kapu, down through Kalo'i Gulch where the ali'i makuahine with the two lei niho palaoa recently emerged from One'ula, the sacred sands of 'Ewa. The connections to the past, and thus the direction for the future, are being made everyday as the pieces of the past are lovingly, gingerly and humbly put back together in a race against time and irreparable loss from destruction and alteration.

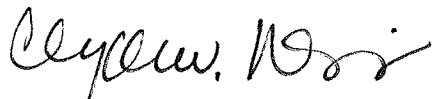
It is with these principles in mind, that OHA would recommend that any proposed pedestrian or bicycle path stay off of and away from the sacred sands of Wailua, and that any such project occur in a more mauka alignment, towards an existing cane haul road. We are cognizant that subsurface cultural features, including human burial sites, could and do exist all throughout the Wailua area, including a more mauka alignment, but the coastal area is truly a living phenomenon and the accretion, shifting and erosion of the beach at Wailua, along with its sacred designation, truly warrants the preservation of the open space there now unencumbered by man made structures, no matter how seemingly ephemeral.

OHA understands that Federal Stimulus monies may be available for some of the transportation improvements planned for Wailua and that portions of this project as well as other related projects may qualify. It is our hope that our comments and recommendations are seen in the light of making difficult decisions on behalf of a wide and diverse beneficiary base, but always in the spirit of Aloha and aloha 'āina. Economic stimulus is truly important in this time of difficulty. We also believe that spiritual stimulus is equally important as well and the well-being of a populace can be measured in many different ways.

In summary, the Wailua area of Kaua'i is a truly unique and sacred traditional cultural landscape where important parts of pre-contact Hawaiian history occurred. It also remains a very special and sacred wahi kūpuna which serves to inspire our modern Native Hawaiian community and cultural practitioners as well as assist in the reconnection of the 'ōpio, the youth, with both the 'āina and with their kūpuna kahiko. We ask that the utmost care and sensitivity be afforded this wahi kapu during the planned improvements from planning all the way through implementation.

Thank you for the opportunity to comment. If you have further questions, please contact Kai Markell, Director, Native Rights, Land and Culture by phone at (808) 594-1945 or e-mail at [kaim@oha.org](mailto:kaim@oha.org).

'O wau iho nō me ka 'oia'i'o,



Clyde W. Nāmu'o  
Administrator

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Pat V. Phung, P.E.  
September 8, 2009  
Page 4

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