



Photo by Pa`a Pono Miloli`i

## **Miloli`i Community Enrichment and Historical Center**

Miloli`i, Ho`opūloa, South Kona District, Island of Hawai`i, Hawai`i

Section 106 Analysis and Cultural Impact Assessment

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for Pa`a Pono Miloli`i

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## Qualifications of Evaluator

36 CFR Part 61 defines the Secretary of Interior's Professional Qualification Standards for the minimum education and experience required to perform identification, evaluation, registration, and treatment activities in historic preservation. Dr. Trisha Kehaulani Watson (JD, PhD American Studies) meets the History (Historic Preservation) Professional Qualification Standards.

## I. Background

Pa`a Pono Miloli`i, a community formed 501(c)(3) incorporated for the purpose of preserving and protecting the cultural, historical, environmental and archaeological life and heritage within the ahupua`a of Ho`okena, Pāpā, Ho`ōpūloa, Miloli`i, Omoka`a, Kalihi, Honomalino, and Kapu`a in South Kona, Hawai`i is currently preparing an environmental assessment for the purpose of assessment any potential impact of the proposed action, which is to design and construct a multi-purpose community center in Miloli`i on State-owned lands to address the community's need for a permanent, covered community center and gathering space for public meetings, cultural activities, and educational and recreational programs.

Pa`a Pono Miloli`i is engaging in this activity with the support of funding received by the United States Department of Housing and Urban Development ("HUD"). Pa`a Pono Miloli`i (PPM) was first formed in 1980 (and formally incorporated in 1983), as Pa`a Pono Miloli`i, Inc., to improve the quality of life for the residents of Miloli`i and South Kona. Among PPM's first efforts was the creation of a Master Plan for the Miloli`i community that focused on supporting residents to secure land and build safe affordable homes in the village. Working directly with the state Office of Hawaiian Affairs (OHA), the state Department of Land and Natural Resources (DLNR), and the Legislative and Executive branches of the State of Hawai`i, PPM successfully lobbied for the passage of Act 62, which provided homes for the descendants of the 1926 Mauna Loa lava flow which had destroyed the original village at Ho`opūloa. Building on the success of this effort, PPM has carried out numerous community projects over the years. Paa Pono Milolii re-incorporated as Pa`a Pono Miloli`i in 2003. The non-profit organization was granted 501(c)(3) status by the Internal Revenue Service in 2004 and continues its mission to improve the lives of the residents of the South Kona fishing village.

PPM is proposing to utilize federal HUD EDI funds to design and construct a multi-purpose community center in Miloli`i on State-owned lands to address the community's need for a permanent, covered community center and gathering space for public meetings, cultural activities, and educational and recreational programs such as:

- Youth programs, whether after school, summer, or over school breaks
- Intergenerational activities connecting youth and *kūpuna*
- Team sports including basketball, volleyball, and others
- Canoe paddling and racing
- Hawaiian language classes
- Micro-enterprise development and training programs.

The proposed action is to build three structures totaling 4,800 square feet in two phases. In Phase I, the main multi-purpose community center (Community Center) would be constructed. The Community Center's footprint is 80 ft. long and 50 ft. wide, or 4,000 square feet. As designed, the Community Center features a large, covered central lanai with enclosed office, visitor reception center, and history/library rooms in the south end of the building, and an enclosed kitchen and classroom at the north end.

Phase II will involve construction of two separate adjoining structures north of the Community Center: a guest quarters and restroom facility. Both structures measure 20 ft. x 20 ft., or 400 square feet in size. The guest quarters contain two separate suites, each with a single-bed bedroom and a bathroom with a sink, toilet, and shower. The restroom building contains separate male and female facilities: the men's has two lavatories, two water closets and one urinal; the women's has two lavatories, and two water closets. The three proposed structures will be designed and constructed to meet Americans with Disabilities Act Accessibility Guidelines (ADAAG).

The buildings will be constructed on concrete slab foundations surrounded by tile and concrete flooring, concrete columns, plaster-finished walls with exterior stone veneers, and fixed, sliding glass, and jalousie windows.

The simple gable roofs, clad in aluminum, will overhang the structure with 4'8 eaves on the two smaller buildings, and 5 feet on the main pavilion. The main pavilion's roof ridge rises to a height of 22 feet. Concrete walkways enclose the perimeter of the buildings, 5 feet wide on the main build, and four feet wide on the two smaller structures.

The plumbing and electrical lines will be standard. Water will be supplied through a catchment system. A septic tank and leach field system will be constructed for the wastewater. Electrical generation will come from solar panels and a generator to serve as back up.

This document is being prepared for the purpose of assessing what impacts, if any, the project may have on historic or cultural resources in the area of potential effect (APE) or region of influence (ROI). Such analyses are required under the Section 106 of the National Historic Preservation Act and Hawai'i Revised Statutes §343.

## **II. Section 106 Analysis**

Section 106 of the National Historical Preservation Act addresses the need for federal agencies to take into account impacts, if any, undertakings have on historic properties. Protection of Historic Properties and Section 106 analysis are regulated under 36 CFR Part 800. This part provides guidelines as to conducting an analysis in assessing when and how to undergo Section 106 review.

### **A. Establishing Undertaking**

The first step in initiating the Section 106 process constitutes determining whether or not a proposed Federal action is an undertaking as defined in 36 CFR §800.16(y), which states: “*Undertaking* means a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those required a Federal permit, license or approval.”

It has been determined that this proposed action is an undertaking as defined in §800.16(y).

## **B. Area of Potential Effect or Region of Influence**

The Area of Potential Effect (APE) or Regional of Influence (ROI) for this project includes the project location and affected environments (including project site and adjacent lands).

### **1. Project Location**

Miloli'i Beach Road  
Miloli'i, HI 96704

Ahupua'a:	Ho'opūloa
District:	South Kona
Island:	Hawai'i
Tax Map Key No.:	(3) 8-9-014: 038, 039, 040, and 041.
Size:	40,000 sq. ft. (0.918 acre).

### **2. Region of Influence**

Miloli'i is a coastal village located on the relatively flat Kapalilua coastal plain. Its shoreline features include a black sand beach at Ho'opūloa Bay; broad, gently sloping seaward extensions of lava flows between Ho'opūloa and Miloli'i bays and Kapulau Point; and shallow and exposed lava platform reefs separating Miloli'i and Omoka'a bays. The coastal lava flows are derived from prehistoric flows and the 1926 flow. A tongue of lava from the 1926 flow enters the water south of Ho'opūloa Bay and then rises about thirty feet above the adjacent lava, where 62 individual single-family lots of 10,000 square feet each have been developed. These lots, known as Miloli'i Village Phase II, are two deep along the makai side of the Miloli'i Road, with a common access drive for four lots. At about midpoint of the Phase II development, the 1926 flow ends and the land abruptly drops about 30 feet into a broad gully about 400 feet wide. It is within this low-lying gully that the project site is located, covering four of the single-family lots. About 150 feet south of the project site, the coastal plain rises again, and the remaining Phase II house lots continue south.

The project site consist of four parcels of 10,000 sq. ft. each, all of which are owned by the State of Hawai'i. The parcels are unoccupied and currently serve no purpose. The project site has been previously graded and contains the remnants of an abandoned demonstration water desalination facility that was constructed in 1990 and intended to service the area residents. This remnant is mostly contained on the mauka lots (Lots 38 and 41) and includes a large

concrete pad (about 30 ft. x 30 ft.), metal and rubber piping, and a large wooden single-story shed. Approximately  $\frac{3}{4}$  of the makai lots (Lots 39 and 40) have been cleared and graded. The remaining  $\frac{1}{4}$  (about 25 feet) of these two parcels, running along the length of their makai boundaries, consist of a mound of lava rock about four feet high. The mound is the result of grading portions of the parcels and pushing the excess lava and soils makai. Atop this mound vegetation typical of the region, such as kiawe (*Prosopis pallida*) and Christmas berry (*Echinus terebinthifolius*) has established.

Adjacent to the southern mauka-makai property line of parcels 38 and 39 is a graded and compacted gravel beach right-of-way access road 100 ft. long and 50 ft. wide, connecting Miloli'i Road to the shoreline. The access road narrows and becomes rough as it nears the shoreline. The shoreline in this area is very rocky and allows very limited and difficult access to the ocean.

### **C. Determining Presence of Historic Properties**

NHPA Section 106 requires the agency to “take into account the effect of (an) undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register (of Historic Places.)” 16 U.S.C. § 470f. NHPA section 101(d)(6)(B) requires agency officials to consult with any Native Hawaiian organization that attaches religious and cultural significance to historic properties that may be affected by an undertaking, regardless of the location of the property. 36 CFR §800.16 provides the following definition of a “historic property”:

(l)(1) *Historic property* means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria.

Hawaiian historical sites of significance include, but not limited to: sites related to traditional Hawaiian navigation and other seafaring traditions, traditional Hawaiian fishponds, ko`a (traditional Hawaiian fishing shrines typically consisting of piles of coral or stone), Hawaiian heiau (religious structures), Native Hawaiian burial sites, leina (places from which spirits leapt into the spirit world), and other cultural heritage properties. NHPA section 106 requires an agency to make a reasonable and good faith effort to identify historic properties, determine whether identified properties are eligible for listing on the National Register, assess the effects of the undertaking on any eligible historic properties found, determine whether the effect will be adverse; and avoid or mitigate any adverse effects. To this end, NHPA regulations require an agency to provide Native Hawaiian organizations, as consulting parties, with “a reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, including those of traditional religious and cultural importance, articulate its views on the undertaking’s effects on such properties, and participate in the resolution of adverse effects.” 36 CFR § 800.2(c)(2)(ii)(A).

Review of existing archeological studies and historical documents reveal no evidence of any “historical properties” within the APR or ROI. No documented archaeological sites have been found in the area of the project site. Extensive community led studies have been done

regarding the historical, cultural, and archeological resources of the area. A 1984 Master Plan conducted by Pa`a Pono Miloli`i provides substantial insight into the history of Miloli`i.

The history of human settlement in the Miloli`i-Ho`opūloa area undoubtedly extends back into the first millennium A.D. though little remains in the area to tell of this story. Less than a mile to the north of the current community at Alike Bay are the visible remains of a hōlua slide and a number of ancient house sites. Less than a mile to the south at Honomalino Bay are more ancient house sites. These extensive sites suggest the area was once one of sizeable human activity.

The community's recorded history is tied closely to that of the church. In the early nineteenth century, missionaries occasionally would make the long journey from Kailua to preach and instruct in the ways of the Gospel.

In 1831 and again in 1835, the missionaries conducted the first complete census in Hawai`i. The 1835 census included the villages of Miloli`i and Ho`opūloa under the District name of "Kapalilua." At that time there were a total of 1,406 people recorded being in the district (486 kāne, 488 wahine, 219 Keikikāne and, 213 Keikiwahine).

By 1854, Miloli`i had grown to become the site of one of the six major churches in the Kona District and had a congregation of 14 members. By 1883, the size of the congregation had grown to warrant the Miloli`i church, Hau`oli Kamana`o, designated as a separate mission. The church is still standing and though moved from its original site by "an act of God," it provides a link to the past for the community's residents.

The resident populations at Miloli`i and Ho`opūloa remained constant but small throughout the latter nineteenth century and declined slightly at the turn of the century. The 1910 census of Miloli`i and Ho`opūloa reflected a total population of 98. This included 8 households at Miloli`i and 4 households around the bay at Ho`opūloa. In 1910, the census indicated 72 people living at Miloli`i and 26 at Ho`opūloa.

For the next sixteen years, the community remained much as it always had, but, then on the morning of April 18, 1926, life at Ho`opūloa was altered forever. Molten lava from Mauna Loa's Pu`u O `Ke`oke`o gradually approached and completely covered the small coastal fishing village. Many of the families, lacking alternative shelter, moved a quarter mile down the coast to Miloli`i. There they built new homes mostly on government land. Other residents moved mauka and found shelter as best they could.

The present Miloli`i-Ho`opūloa community is spread through four original land grants in the ahupua'a of Miloli`i, Ho`opūloa, and Omoka`a:

1. Grant 1581 issued by Kamehameha III in 1855 to Kama for 2.4 acres in the ahupua'a of Ho`opūloa.

2. Grant 2738 issued by Kamehameha IV in 1860 to Keli'ikuli for 1,453 acres in the ahupua'a of Ho'opūloa.
3. Grant 1585 issued by Kamehameha III in 1855 to Kaleohano for 275.5 acres in the ahupua'a of Miloli'i.
4. Grant 3079 issued by Kamehameha IV in 1870 to Kiekie for 98.02 acres in the ahupua'a of Omoka'a.

These original grants were subdivided further by various Land commission Awards, each with its own long history. Early residents in isolated, rural areas did not always understand the process involved in obtaining legal title to land as defined by the Great Mahele. Residents in Miloli'i and Ho'opūloa were no different from their contemporaries.

The portion of the project site that was covered by the 1926 flow low may have had sites that were destroyed by lava. Legend has it that an ali'i from Kaua'i is buried in the Kapukawa'aiki area. History does indicate that there was a relationship between the ali'i of Kaua'i and those of Kapalilua. The supposed burial site however, is not in the area near the project proposal (Pa'a Pono Miloli'i 1984).

Between 1973 and 1974 the state conducted a survey in the Miloli'i area in an attempt to identify sites and structures for the "Hawai'i Register of Historic Places." A number of churches and characteristic structures were identified. In the village of Miloli'i these included:

- Magoon House – a unique example of a small wooden “Kona House” built in the late nineteenth century of the area.
- St. Peter's Catholic Church - a fine example of this architectural style. The Church was built in 1932 by Father Steffen to replace an earlier St. Peter's destroyed by the 1926 lava flow.
- Apo House - an example of typical architecture of older houses in the Miloli'i District.
- Miloli'i School - an example of this architectural style.
- Hau'oli Kamaha'o Congregational Church - an example of architectural style with historical significance. The church was built about 1887 and is an excellent example of early missionary wood construction.

#### **D. Determination of “No Effect”**

Upon determining there may be historic properties present, the analysis turns to whether the undertaking is a type of activity that does not have the potential to cause effects on historic properties. If it does not, then the agency official has no further obligations under NHPA section 106.

36 CFR §800.16(i) provides the following definition: “*Effect* means alternation to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.” NHPA regulations provide that an “adverse effect” occurs when an undertaking “may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.” 36 CFR § 800.5(a)(1). Adverse effects may include physical destruction of or damage to all or part of the property; alteration or removal of the property, change of the character of the property’s use or physical features; introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s historic features; and transfer, lease, or sale of the property.

None of historic resources within the APE are located at the project site, and there is no reason to anticipate that the proposed action would have any impact on these resources, direct or indirect, on these resources. There is no reason to anticipate that the proposed actions would impact on the physical, visual, atmospheric, audible or aesthetic features of any historic properties or resources.

Additionally, the State Historic Preservation Division review of the Environmental Assessment for The Water Desalination Plan and Distribution System, under CDUP HA-1653, dated June 28, 1991 and located at project site, noted that the proposed development would have no effect on historic sites:

“The site development of the water system will probably have no effect on historic sites. This determination is based on large part by our staff’s familiarity with the project area and a number of field inspections made in conjunction with various community projects and concerns. . . it is apparent that most of the facilities . . . are along already altered roadbeds or in previous bulldozed areas. We concur that if any archeological remains are uncovered unexpectedly during construction, they will be preserved and protected by the community working in concert with the State Preservation Division.”

Nothing previous activities in the area have been determined by the State Historic Preservation Division to have “no effect” on historic properties; our analysis of the current proposed activities supports a “no effect” determination in this case as well. None of the alternatives under consideration in the proposed action entail destruction, modification, or alteration of historic sites, resources, or other historic properties. None of the proposed activities will introduce visual, atmospheric, or audible elements that affect the features of any historic property. Therefore, it is recommended that authorizing agencies find this project has no potential to cause effects on historic properties. Accordingly, initiation of consultation under Section 106 is not required.

#### **E. Notice to State Historic Preservation Officer**

Upon determination that this project has no potential to cause effects on historic properties, the agency should provide notice to the State Historic Preservation Officer (SHPO) and the State Historic Preservation Division Administrator of its determination. The agency official shall also notify all consulting parties and provide them with the documentation specified in 36 CFR 800.11(e).

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State Historic Preservation Officer (Hawai`i):  
Bill Ailā, Chairman  
Department of Land and Natural Resources  
Kalanimoku Building  
1151 Punchbowl St.  
Honolulu, HI 96813

State Historic Preservation Division Administrator (Hawai`i):  
Pua Aiu, PhD, Administrator  
State Historic Preservation Division  
Department of Land and Natural Resources  
601 Kamokila Blvd., Suite 555  
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Under 36 CFR §800.3, once the agency official determines that the undertaking is not an activity that has the potential to cause effects on historic properties, the agency official has “no further obligations under section 106 or this part.”

### III. Cultural Impact Assessment

Hawai`i Revised Statutes §343 requires an environmental assessment of cultural resources. The purpose of this assessment is to analyze the impact of a proposed action on cultural practices and features associated with the project area. This analysis should be integrated and included in the project’s Environment Assessment.

#### A. Methodology – Community Involvement

This project is atypical in that it is initiated by the community and it is intended to enhance cultural resources and activities. Therefore, the methodology employed in the preparation of this cultural impact assessment deviates from other projects in which the responsible party is not a member of the affected community. Existing secondary data sources, including but not limited to historical collections and reports, were utilized in this analysis, rather than the preferred method of primary data collecting. Community involvement occurred through project initiation and development rather than traditional consultation. In 1984, Pa`a Pono Miloli`i initiated and led a Master Plan for Miloli`i. Pa`a Pono Miloli`i’s involvement and development of the proposed action is part of the implementation of that community led planning event.

#### B. Oral Histories

There are numerous mele (songs) and mo`olelo (stories) about Miloli`i. Many oral histories have been compiled about the value of the area as one of the last Hawaiian fishing villages and about the rich natural resources that still exist there today. One mo`olelo from the early 1900s explained:

“This region is seldom visited. Its chief points of interest are the remains of a *heiau*, *mauka* of the Catholic church at Milolii, some fine *papa konane* at the south end of the same village, a well preserved *kuula* (still used) where fishermen offer offerings of fruit to insure a good catch, by the beach south of Milolii, where the Honomalino Ranch fence crosses the trail; while all along the trail are smaller *kuulas*, and at many points the

foundations of villages, where old implements may still be found.” (Maly and Maly, 2003).

It has been aptly documented that the link between the cultural practices and natural resources are inseparable in Miloli'i, thus making the area one of the most important in regards to maintaining and enhancing the endemic biocultural resources of Hawai'i.

Today, the most famed mele of Milolii refer to the “miraculous” events in 1868.

La `Elima  
(Na Elizabeth Kuahaia)

La `elima o Pepeluali  
Waimaka hehele(he`e nei)`i ke alanui

Paiki pu`olo pa`a i ka lima  
(Maika pu olo a`a ika lima)  
Waimaka hehele `i i ke alanui!  
(Ae maka hele he`e nui ike alanui)

Penei pepe `alala nei  
(He nei pepe ala`a nei)  
He hu`i ma`e`ele kou nui kino  
(E`u ima e hele kou lui kino)

Ha`ina `ia mai ana ka puana  
He mele he inoa no Miloli`i  
(E mele he noe no Miloli`i)

This mele captures in song the events of 1868. Still sung today, the tsunami that moved Hau`oli Kamaha`o Church is perhaps the most well-known historical event associated with Miloli'i. It has significantly influenced that mele and mo`olelo that come from the region. Miloli'i is also referenced in numerous other songs. The songs reference Mahukona, the wharf at Miloli'i.

Miloli'i also appears in prominent mo`olelo, as in Kaa no Kamapuaa, the tradition of Kamapua`a (Fornander, 1918). While by many accounts, Miloli'i was neither heavily populated nor traversed, the area was commonly and prominently known.

In more contemporary times, Pa`a Pono Miloli'i has worked steadily to develop and gather the `ike, the knowledge or information, from kūpuna and residents. Much of this information was documented in the 1984 Master Plan, from which this project emanates. This `ike is consistent with the traditional mo`olelo and mele associated with the area.

### C. Cultural Sites and Practices

Neither mo`olelo nor mele reveal any potential concern for disruption of sacred cultural sites at the project location or region of influence (ROI), including historic sites and biocultural resources. While there are historic sites within the ROI, there is no anticipated or foreseeable impact on these sites. There is also a wealth of biocultural resources present in the ROI, which are described below.

The ocean and fishing is at the core of the Miloli'i-Ho'opūloa communities' cultural identity. Primary fishers include a traditional 'ōpelu (*Decapterus sanctae-helenae*, Mackerel scad) fishery, near-shore reef fishery, and an off shore pelagic and bottom fishery (Pa'a Pono Miloli'i, 2011).

Within the vicinity of the village there are at least four small anchialine ponds; three are to the south between Miloli'i Bay and Kapulau Point, and one just inshore from Kapulau Point, these ponds have a combined surface area of less than 1,100 square feet and are between one and four inches in depth (Pa'a Pono Miloli'i 1984).

A shallow reef fifteen to twenty-five feet in depth is located off the village area. The shelf drops and then rises again to form a ledge which gradually falls off seaward at an increasing slope reaching a depth of about 120 feet 1,800 ft. offshore (Ibid.).

The coastal waters around Miloli'i-Ho'opūloa are classified as "Class AA" and are protected for "Oceanic research, the support and propagation of shellfish and other marine life, conservation of coral reefs and wilderness areas, compatible recreation, and aesthetic enjoyment." (Ibid.) The area is also of cultural import. One of the traditional ocean boundary markers was known as Kākākoholā; it was the boundary marker between Miloli'i and Ho'opūloa. The name comes from mo'olelo which tell of men who, mistaking the rock for a whale, beat on the rock until their paddles broke (Maly and Maly, 2003). Hence the name, Kākākoholā, to strike (kākā) the whale (koholā).

A US Army Corps of Engineers survey, found that coral development on the surrounding offshore platforms at Miloli'i Bay and its vicinity was "patchy." But coral formations do exist. In the high surge areas, colonies of *Pocillopora meandrina* are common but are supplemented with *Porites lobata* colonies in medium surge areas. The large boulders at the bases of the lava platforms are encrusted with heavy coral growth of *Porites*. Finger coral, *Porites compressa*, dominates the terrace bottom beyond the boulders. Coral growth generally disappears after the ninety-foot depth level (USGS 1981).

Besides corals, other animal life includes a number of species of echinoderms (sea urchins), including *Tripneustes gratilla*, *Diadema paucispinum*, and *Echinothrix diadema*, and reef fish.

Fish species identified include:

- Paurupeneus multifasciatus* (Moana)
  - Pomacentrus jenkins* (Jenkin's Damsel Fish)
  - Chromis vanderbilti* (Vanderbilts Damsel Fish)
  - Acanthurus nigofuscus* (Blackish-Brown Surge Fish)
  - Zebrasoma flavescens* (La 'ī pala, Lau'ipala, Laukipala)
  - Acanthurus mata* (Puala, Puwalu)
  - Ctenochaetus strigosus* (Kole)
- (DLNR 1971).

In addition, the pāku'iku'i (*Acanthurus achilles*) a member of the surgeonfish family is an abundant resident of Miloli'i's reef. Milolii was known in story and song for the rich marine resources, with references identifying that those who came to barter with the residents via the boat landing would come away with "dried fish, viz. hauliuli, ahi, aku, hee, pauau, ulua, kahala, ulaula, uhu, moano, humuhumu, oopu, kala" (Maly and Maly, 2003).

Marine plant life, limu or, seaweeds, is also plentiful along the coast between Miloli'i and Ho'opūloa. At Papa Bay and Alike Bay where fresh water is discharged into the ocean, the green seaweed Limu pahapaha (*Ulva Fasciata*) is abundant.

#### **D. Impact Assessment**

There is no indication that the proposed action would have any adverse effect on the cultural resources or practices of the area. Conversely, the proposed action would likely benefit the area and community's cultural resources and practices.

The goal of HRS §343 is to require project developers to include the impacted community in their planning. This project is atypical in that the community is the project developer. One of the goals of the project is to enhance the community's capacity to perpetuate and enhance the area's historical resources and cultural practices.

##### **1. Proposed Action**

The proposed action is expected to have a beneficial effect on cultural resources. As a result of the proposed action, a new permanent community center would be constructed that includes space for a cultural center and exhibition space. These would broadcast and perpetuate the cultural history of the Miloi'i area and celebrate the community itself, thereby enhancing its present-day identity. This in turn would help spur on community members to plan, preserve, protect and perpetuate their cultural resources, archeological sites, historic structures, and traditional cultural practices.

##### **2. No Action Alternative**

Under the no-action alternative, no construction or ground-disturbing activities would occur. The potential to disturb cultural resources would not exist, so there would be no effect on cultural resources. However, if the community center were not constructed, it would be a loss to the community of a permanent public facility, which is envisioned to enable the people of Miloli'i to strengthen their community ties, honor their past, and perpetuate and pass on their cultural traditions and stories to future generations.

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