



Kailua

HAWAIIAN CIVIC CLUB

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E Ala nā Mamo i Ola nā Pua

March 31, 2025

Governor Josh Green
State of Hawai'i
State Capitol, Executive Chambers
415 S. Beretania St.
Honolulu, HI 96813

Mayor Rick Blangiardi
City and County of Honolulu
Honolulu Hale
530 S. King St. Rm. 300
Honolulu, HI 96813

Re: 330 Ku'ulei Road Affordable Housing Project
Request for Stop-Work Order, AIS, and Monitoring

Dear Governor Green and Mayor Blangiardi,

The board of directors of the Kailua Hawaiian Civic Club has voted unanimously to request a Stop-Work Order, AIS, and Monitoring for the 330 Ku'ulei Rd. Affordable Housing Project. We do so out of deep concern for possible desecration of iwi kūpuna at a location for which the State Historic Preservation Division (SHPD) has requested an Archaeological Inventory Survey(AIS), and for which the project applicant's contracted archaeological firm – Pacific Legacy – has made the same recommendation.

The City's Department of Planning and Permitting, although required by Hawai'i burial laws to exercise due diligence in approving any project that might impact ancestral burials, has ignored both recommendations and allowed ground penetrating work to proceed at the site without AIS testing or archaeological monitoring. Because this work has been going on for several weeks now, we have no way of knowing if iwi have been dug up and deposited in piles of backdirt – or of knowing if iwi are in backdirt that has already been moved to other locations. Although testing and monitoring are no guarantee against the discovery of iwi, they go far to mitigate the impact of discovery. At present, there are no such guardrails in place, and we find this unconscionable and in possible violation of the intent, at least, of HRS 6E.

In light of the many burials and cultural features that have been documented within a half-mile radius of 330 Ku'ulei (Pacific Legacy has identified 41 features; our own records indicate more than 60 burials alone), we urge that work at the site be stopped immediately and that a state-approved archaeology firm be contracted to: 1- screen all backdirt associated with the project, and 2- conduct an AIS that, in turn, must be approved by SHPD before ground penetrating work can resume.

We are the authors of a resolution passed by the Association of Hawaiian Civic Clubs at its 2023 convention that calls for better coordination between SHPD and DPP in matters related to protecting iwi kūpuna in the jaucus sands of Kailua and other similarly situated areas. That resolution has triggered the O‘ahu History Preservation Commission to release a preliminary report, “A Community Burial Ground in Kailua,” that aims, in part, to eliminate the loophole through which DPP is now attempting to squeeze – namely, that of ignoring the experts in favor of expediency and the narrowest reading of the law. We cannot keep silent in the face of such disregard for those whose protection we hold most dear: our iwi kūpuna.

me ka ‘oia‘i‘o,

The Kailua Hawaiian Civic Club Board of Directors:

Kapalai‘ula de Silva, President
Kalani Ka‘anā‘anā, First Vice President
Kīhei de Silva, Second Vice President
‘Ilima Ka‘anehe, Treasurer
Māpuana de Silva, Immediate Past President
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Cc Dawn Chang, Chairperson, DLNR
 Jessica Puff, Administrator, SHPD
 Dr. Susan Lebo, Archaeology Branch Chief, SHPD
 Ms. Samantha Hemenway, O‘ahu Island Archaeologist
 Ms. Regina Hilo, Burial Sites Specialist (O‘ahu)
 Ms. Dawn Apuna, Director, Dept. of Planning and Permitting
 Mr. Bryan Gallagher, Dept. Director, Dept. of Planning and Permitting
 Ms. Elizabeth Krueger, Dept. of Planning and Permitting
 Mr. Michael Kat, Dept. of Planning and Permitting
 Mr. Tommy Waters, Chair, Honolulu City Council
 Ms. Esther Kia‘āina, Vice Chair and District 3 Rep., Honolulu City Council
 Ms. Stacy Ferreira, Chief Executive Officer, Office of Hawaiian Affairs
 Mr. Kamakana Ferreira, Lead Compliance Specialist, Office of Hawaiian Affairs
 Mr. W. Kamana‘o Mills, Chair, O‘ahu Island Burial Council
 Mr. Brickwood Galuteria, Ko‘olaupoko Rep., O‘ahu Island Burial Council
 Ms. Kēhau Abad, Chair, O‘ahu Preservation Commission
 Ms. Makani Maeva, President and Managing Director, The Āhē Group
 Mr. Nick Belluzzo, Chair, Society for Hawaiian Archaeology

Governor Green, Mayor Blangiardi

Kailua Hawaiian Civic Club Request for Stop-Work Order, AIS, and Monitoring

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