

MEMORANDUM FOR RECORD

SUBJECT: Continued Section 106 Consultation for the Proposed Modernization Projects at Piiilaau (Piiilā'au) Army Recreation Center: Meeting Notes to Discuss a Resolution of Adverse Effects for the Development of a Programmatic Agreement (CRS-18-103).

1. In accordance with the National Historic Preservation Act, 36 CFR 800.6, United States Army Garrison, Hawaii invited the Advisory Council on Historic Preservation, Hawaii State Historic Preservation Division, Native Hawaiian Organizations and interested parties to a meeting to continue Section 106 consultation regarding potential effects to an archaeological site as a result of the proposed modernization projects at Piiilā'au Army Recreation Center (PARC).
2. The purpose of the consultation meeting was to finalize a draft Programmatic Agreement (PA) for PARC. The goal of this fourth meeting focused on ensuring that Native Hawaiian Organizations and interested parties have the opportunity to provide input on the draft PA.
3. The meeting was held in three sessions. Meeting notes are included as follows:
 - a. Thursday, October 7, 2021 from 9:00 a.m. to 10:15 a.m. (Enclosure 1);
 - b. Friday, October 22, 2021 from 9:00 a.m. to 10:30 a.m. (Enclosure 2);
 - c. Tuesday, November 9, 2021 from 9:00 a.m. to 10:30 a.m. (Enclosure 3).
3. Due to COVID 19 restrictions meetings were held via teleconference on Microsoft TEAMS.
4. The point of contact is Ms. Jacqueline Pamerleau-Walden, (808) 655-9727 Archaeologist, USAG-HI Directorate of Public Works, Environmental Division (DPW-ENV).

Jacqueline Pamerleau-Walden
Archaeologist
USAG-HI DPW-ENV

3 Enclosures:

1. Meeting Notes - 7 October 2021
2. Meeting Notes - 22 October 2021
3. Meeting Notes - 9 November 2021

Enclosure 1: 7 October 2021 – Meeting Notes

Participants

Advisory Council on Historic Preservation (ACHP)

Rachael Mangum – Army Liaison

State Historic Preservation Division (SHPD)

Stephanie Hacker – Archaeologist

Tamara Luthy – Ethnographer

Susan Lebo – Archaeology Branch Chief

U.S. Army Garrison – Hawaii (USAG-HI)

Richard Davis – Cultural Resource Manager

Jacqueline Pamerleau-Walden – Archaeologist

Angus Raff-Tierney – Archaeologist

Bobby Escobar – Environmental Attorney, Office Staff Judge Advocate

Jillian Singleton – Chief, Business Operations Division DFMWR

Paul Vasquez – Acting, Business Operations Manager DFMWR

U.S. Army IMCOM

Len Ambrosio – Chief, Major Projects Branch, IMCOM HQ-G9

Piilā'au Army Recreation Center (PARC)

Diana Wendlinger – Business Operations Manager for PARC

Amon Evans – Remodeling Project Manager DFMWR

Native Hawaiian Organization (NHO)

Christopher Oliveira – Marae Ha'akoa

Glen Kila – Ko'a Mana / Koa Ike

Office of Hawaiian Affairs (OHA)

Lauren Morawski

Agenda Item 1: Introductions

Meeting opened with introduction of participants and clarified individual roles in the Section 106 process.

Agenda Item 2: Memorialize Decisions in the Draft Programmatic Agreement

Ms. Walden noted that OHA and Dr. Lebo had RSVP'd but are not here yet.

Ms. Hacker said hopefully Dr, Lebo will join us.

Ms. Walden previously sent an email with a draft of the Programmatic Agreement (PA) plus appendices and a document explaining the PA process and asked if everyone had an opportunity to review it. Copies of minutes are available on the USAG-HI website or by request.

Ms. Mangum and **Mr. Kila** affirmed they had read the documents, while **Mr. Oliveira** said he had not had the chance.

Ms. Walden reviewed the agenda and identified the current step of the PA process is reviewing a draft the PA and addressing comments and edits. The next step is review the final draft and then finalize the PA with signatures. We are still in the editing and developing phase of the draft PA.

Ms. Hacker asked when the draft PA had been sent to the SHPO and clarified that she had not had a chance to read the draft.

Ms. Walden replied it was sent out two weeks ago. The draft was developed after consultation meetings with all parties; taking into account their concerns. USAG-HI then sent a draft to IMCOM for their review. Now that review comments from IMCOM have been received a draft is being presented to the group for review and comment.

Whereas Clauses:

Ms. Walden shared the draft PA on the screen the group requested to review the draft in whole beginning with the first whereas clause.

Mr. Oliveira requested the correct spelling of Pīlīā'au in the final version with diacritical's. **Ms. Mangum** suggested two spellings of the name to include a parenthetical.

Ms. Walden stated the second paragraph says there are projects that are undertakings subject to Section 106.

Ms. Mangum suggested clarifying the relationship between the three entities - who is PARC since PARC is not listed in the title? Is PARC proposing projects, or is MWR proposing?

Mr. Davis clarified that DFMWR is a tenant of USAG-HI who is ultimately responsible for this project.

Dr. Lebo joined the meeting.

Ms. Walden explained that the next whereas clause states Army Regulation 200-1 is a legal driver, then below that has the definition of historic properties.

Ms. Mangum suggested including a map.

Mr. Oliveira requested the sand pile to be included as part of this agreement. While **Mr. Kila** added that *iwi tupuna* (ancestral remains) have been removed from the sand pile and need to be addressed.

Ms. Walden explained that the existing PARC NAGPRA Comprehensive Agreement covers *iwi tupuna*.

Dr. Lebo would like to see clarity that the APE includes everything with the boundary of PARC and the sand pile. There should also be clarity that there has been a surface survey and some subsurface testing but the entire area has not been subsurface tested.

Ms. Walden explained the APE of the PA covers the PARC boundary and that Site 3998 includes the entire boundary of PARC south of Kaupuni stream, a map will be added to Appendix A

Mr. Kila asked if Harvey House is included in the boundary, while **Mr. Oliveira** added it should be included if it is part of a lease.

Dr. Lebo said if the City and County own that area it is their job to identify historic properties under Section 6E.

Ms. Walden paraphrased the next whereas clause as pointing to Appendix B for the built environment at PARC that is not eligible for the National Register. After that it discusses the archaeological guidelines that all projects must abide by. Then it lists undertakings excluded from further section 106 review.

Mr. Oliveira requested the archaeological guidelines be developed in partnership with consulting parties. **Dr. Lebo** added the guidelines should be sent to everyone. **Ms. Mangum** added that they could be included as a mitigation stipulation. **Dr. Lebo** said they prefer to have them attached to the PA, while **Mr. Oliveira** and **Ms Hacker** affirmed their agreement.

Ms. Morawski joined the meeting.

Mr. Oliveira asked to include "view planes" in whereas clauses about special expertise for NHO's.

Ms. Walden moved on to the next whereas which points out the many parties that have been invited to participate, and added they are still invited despite most not participating or responding as of this meeting.

Dr. Lebo asked if city and county participated. **Ms. Walden** responded in the negative.

Dr. Lebo opined that the city and county should participate. **Ms. Walden** responded noted the request.

Mr. Oliveira asked if ACHP was participating. **Ms. Mangum** stated she is the ACHP representative.

Stipulation I - General

Ms. Walden continued on to stipulations. No comments for Stipulations I.A. or I.B.

Mr. Oliviera asked to ensure that future work is direct contracting, instead of subcontracting to avoid a repeat of the seawall project and avoid using the Army Corps of Engineers (ACOE).

Mr. Ambrosio asked to clarify if the request is for some level of separation independent from the contractor performing the work. **Mr. Oliveira** stated that the contract should not be for a range of services but for a specific contract.

Mr. Oliveira explained that the Research Corporation University of Hawaii mismanaged the sand pile as resources were spread thin. The sand pile project was started and then the contract was cut without allowing for completion.

Dr. Lebo wants the Army to be responsible for the contractors working on Army projects. PA must identify the responsible party.

Ms. Walden stated that the purpose of this PA is to ensure that projects won't result in similar outcomes as the sand pile. An archaeological resources protection act (ARPA) permit has been drafted and can be included in the draft PA. There were lots of lessons learned during the sea wall project.

Mr. Davis stated that often a contract for the Army is processed by ACOE which contracts to a prime who then contracts to a sub, and the chain of responsibility gets lost. This is why an ARPA permit has been drafted to apply to anyone conducting archaeological work regardless of who hired them.

Mr. Oliveira responded there needs to be an improvement in the way the contracting is done. USAG-HI should contract directly and any poor work should not be blamed on the contractor archaeologist as the Garrison is ultimately responsible. PARC is highly culturally sensitive and risk management does not make sense.

Mr. Kila supported a clear line of authority.

Ms. Mangum shared that the ACHP recently released guidance on traditional knowledge. This guidance says that experts in traditional knowledge should be contracted and compensated. The PA may need to expand the definition of who is qualified to do the work.

Ms. Wendlinger suggested including educational classes to the contractors.

Ms. Hacker requested after an action analysis report for the seawall project, and asked when we can expect it.

Mr. Davis stated the seawall project sand pile is not considered a closed action at this point. Alice Roberts the Conservation Branch Chief of USAG-HI DPW has requested a meeting with Dr. Downer and Susan Lebo on a wide range of issues, including the sand pile, SHPD has not replied. The seawall project was unsatisfactory for the Army.

Dr. Lebo acknowledged they will follow up with Dr. Downer.

Mr. Oliveira stated that these consultation meetings are very valuable for consulting parties to give their opinions and find greater understanding of the process.

Mr. Ambrosio suggested sending out a comment response matrix to facilitate review.

Mr. Oliveira asked to clarify who defines feasible and prudent and to add potential historic properties. The sentence about USAG-HI preference to avoid adverse effects should be a separate whereas.

Ms. Walden noted the request to clarify that the preference is to avoid adverse effects as supported by 36 CFR 800.

Mr. Ambrosio suggested an overarching paragraph to explain the process for the entire document, and spells out relationships to avoid repetition.

Ms. Walden responded that this general section (II) is the overarching part and that they can word and clarify as necessary.

Ms. Mangum recommend referencing the process later in the document if a process will have an adverse effect. There is a process to involve discussions about historic properties.

Mr. Oliveira concurred that it's important to have an overarching statement explaining the involvement of stakeholders in process about adverse effects. **Ms. Walden** confirmed the request is to reword and clarify the process.

Ms. Walden polled meeting attendees' availability for the next meeting, all agreed that 1.5 hours was a good duration. The next meeting will resume at Stipulation I.E.

Mr. Oliviera made a statement that he has created an archaeological firm and wants to ensure that everything is clear that he will not consult to benefit the company and he will not mix the two to ensure no conflict of interest.

Dr. Lebo would like to see a whereas clause that outlines procedures if changes to the scope of work or the APE occur after an undertaking has begun.

Meeting adjourned

Next Meeting 22 OCT 2021

Enclosure 2: Meeting Notes – 22 October 2021

Participants

Advisory Council on Historic Preservation (ACHP)

Rachel Mangum – Army Liaison

State Historic Preservation Division (SHPD)

Susan Lebo – Archaeology Branch Chief

Stephanie Hacker – Archaeologist

U.S. Army Garrison – Hawaii (USAG-HI)

Alice Roberts – Conservation Branch Chief

Dave Crowley – Archaeologist

Jacqueline Pamerleau-Walden – Archaeologist

Laura Gilda – Archaeologist

Jillian Singleton – Chief, Business Operations Division DFMWR

Paul Vasquez – Acting, Business Operations Manager DFMWR

Piliā'au Army Recreation Center (PARC)

Diana Wendlinger – Business Operations Manager

Native Hawaiian Organization (NHO)

Christopher Oliveira – Marae Ha'akoa

Glen Kila – Ko'a Mana/Koa Ike

Office of Hawaiian Affairs (OAH)

Lauren Morawski

Agenda Item 1: Introductions

Meeting opened with roll call.

Agenda Item 2: Recap Previous Meeting Minutes

Ms. Walden stated this meeting will continue on with the review of the draft programmatic agreement (PA). Topics from the previous meeting were recapped and **Ms. Walden** clarified that the seawall and sand pile projects are separate and commented that the PA will cover future projects while taking into account lessons learned from past projects; but the PA will not cover retroactive mitigations.

Ms. Walden noted that USAG-HI has received a draft report for the seawall project from the contractor.

Mr. Oliveira requested a copy of the seawall report so he could review the project and the process for the sand pile. **Ms. Walden** clarified that not including the sand pile project in the PA does not mean that USAG-HI is forgetting it. **Ms. Walden** further commented that USAG-HI is developing a process to prevent future issues in the archaeological guidelines. The PA is the driver for the archaeological guidelines.

Mr. Oliveira commented that he wanted to sort out the contracting issues.

Ms. Hacker requested clarification about Mr. Oliveira's request for a new consultation process. **Mr. Oliveira** responded that he would like a new consultation process for the sand pile and that he thinks the U.S. Army Corps of Engineers (USACE) needs to be involved. **Ms. Roberts** commented that she has a meeting scheduled with USACE to figure out where the process went wrong. **Ms. Mangum** asked if it would help the consulting parties if a whereas clause was added to the PA to separate the sand pile/seawall project from this PA. **Mr. Oliveira** responded that he appreciates anything that would add accountability to the sand pile project.

Ms. Walden circled backed to the review of the PA and stated that a map illustrating the site boundary of PARC was emailed to the group for review. Ms. Walden reminded everyone where the previous meeting left off, and stated that the meeting will start with Stipulation I.E. No comments/questions from participants.

Stipulation II - Project Review Process

Ms. Hacker asked how historic properties that hadn't been assessed yet would be handled. **Ms. Walden** stated that that will be answered in Section II.C.1.c and asked if there were additional questions.

Ms. Lebo asked if all adverse effects will be handled through Stipulation III.B. **Ms. Walden** responded yes, the mitigation measures that were agreed upon in consultation to resolve adverse effects. **Ms. Lebo** stated, we may end up with historic properties that are not yet identified and, depending on what those affects are, may need to individually consult on appropriate mitigation. **Ms. Lebo** asked for further clarification on Section II.A.1 and confirmation that, once the PA has been signed, all adverse effects will get handled through the PA and there will be no further consultation. **Ms. Walden** confirmed that that was correct as the goal of the PA was to resolve adverse effects and that part of this consultation process was to come to an agreement on what projects constitute an adverse effect. **Ms. Lebo** expressed

concerns that the PA would be used to resolve an adverse effect, such as a project like the seawall, before the SHPD could review the project. **Ms. Walden** responded that the PA is for the routine and modernization efforts at PARC which include: waterlines, routine maintenance of PARC itself. **Ms. Walden** noted that additional clarification can be added to the PA as to what are types of activities that are included can be added. **Ms. Walden** asked if she had addressed Ms. Lebo's concerns.

[Ms. Lebo was temporarily unable to respond and **Ms. Mangum** stepped in to try and clarify Ms. Lebo's concerns.]

Ms. Mangum stated that one of the points Ms. Lebo might be trying to raise is, as the mitigation measures in the PA were developed around known historic properties, suppose there's a different type of historic property. USAG-HI might need to consult to develop mitigation measures appropriate to resolve any adverse effects to that historic property. **Ms. Walden** responded that let's see if Section II.C.1.c addresses those concerns. Additionally the PA allows for edits to the appendices, if a new historic property is identified, it could be added to the appendices.

Mr. Crowley stated that a portion of PARC has been identified as an archaeological site containing a variety of features and burials and that many of the buildings on PARC have also been evaluated, though there are buildings that have not yet reached 50 years of age. He doesn't anticipate anything new beyond potential new features to the existing site.

Ms. Mangum acknowledged that PARC is a well-defined site and stated that Ms. Lebo might be thinking about if, for example, if a new multicomponent portion were identified that provided information about a period of the site USAG-HI was unaware of. **Ms. Mangum** stated that Ms. Lebo might have concerns about whether the PA could handle surprises like that.

Mr. Crowley stated that PARC is a multicomponent site and acknowledged the concern.

Ms. Hacker stated that she isn't familiar with a process like this, where the adverse effects are mitigated through a PA. **Ms. Hacker** finds the opportunity to have creative and meaningful mitigation through the consultation process on a project by project basis to be valuable. **Mr. Crowley** noted that what Ms. Hacker is requesting would be a project specific MOA and not a PA. **Ms. Walden** stated that when USAG-HI reached out early on to consulting parties, including Dr. Downer, and asked if a MOA or PA would be better, Dr. Downer recommended a PA and noted that the goal was to streamline the consultation process and to not create a PA that just reverts back to the standard Section 106 process.

Mr. Oliveira requested adding a clause to clarify that if a project is beyond the scope of this PA, such as replacement of the seawall, the consultation will go to a project specific MOA.

Ms. Walden noted the comments and reminded the participants that this PA is for routine maintenance operations and modernization of PARC.

Mr. Crowley suggested that a clause along the lines of projects that do not involve the routine maintenance, repair, and modernization, such as the seawall replacement, would go through the standard Section 106 process.

Ms. Mangum stated that this type of consultation for the development of a PA where consulting parties agree upon a set of mitigations for adverse effects is something she has seen before and it does help streamline the process where adverse effects tend to be repetitive.

Mr. Crowley reminded participants that this is what USAG-HI did for the training PA.

Mr. Oliveira asked if a section that discusses what to do with emergency situations that are not routine could be added. **Ms. Walden** stated that there is a section on how to manage emergencies in the PA.

Ms. Walden read through Section II.C.1.c. **Mr. Oliveira** requested that a line be added stating that consulting parties have input as well into new evaluations and eligibility determinations as well. **Ms. Walden** noted Mr. Oliveira's comment.

No further comments/questions from participants.

Stipulation III – Programmatic Resolution of Adverse Effects

Ms. Walden read through Stipulation III.

Mr. Oliveira stated that cultural advisors need to be present for more than just the discovery of *iwi tupuna*. **Mr. Oliveira** requested that Stipulation III.A.2.c requested that cultural advisors were not restricted to just NAGPRA. **Ms. Walden** asked if Mr. Oliveira meant for ground disturbing activities. **Mr. Oliveira** and **Mr. Kila** agreed.

Mr. Oliveira and **Mr. Kila** approved of all the proposed mitigation treatments laid out in Stipulation III.B.1 and emphasized that Stipulation III.B.1.f was particularly important as they really wanted the local community to be able to engage with the Army and PARC.

Ms. Mangum commented that Stipulations III.B.1.g and h should really be mandatory and might be better off as whereas clauses as they should not be contingent upon an adverse effect. **Ms. Mangum** asked if the cultural awareness training was something that already existed or would need to be developed. **Ms. Walden** said it would need to be developed. **Mr. Oliveira** stated that they would like to be considered when this training was developed as they have non-profit that has been doing cultural awareness training for a very long time and it involves their *tupuna's aina (land)*. **Ms. Walden** acknowledged and noted the comments.

Ms. Hacker asked if the formal recovery plan for archaeological sites would be developed in consultation with the SHPO, NHOs, and other consulting parties or if it will be fleshed out in archaeological guidelines. **Ms. Walden** responded that the recovery plan will be fleshed out in the archaeological guidelines.

No further comments/questions from participants.

Stipulation IV - Emergency Situations

Ms. Walden read through Stipulation IV.

Mr. Oliveira requested that the term "property" in Stipulation IV.A be defined (i.e. cultural property or Real Estate property). **Ms. Walden** acknowledged and noted the comment.

Ms. Wendlinger commented that it is important that if emergency repairs of the water main become necessary, it is important that they retain the option to dig down to the water main, particularly since the water main is on the high side of the property and any water leak has the potential to affect the surrounding properties. **Mr. Oliveira** agreed that facilitating such emergency repair work was important and he recommended a comprehensive plan to update the existing water lines to avoid large failures that could impact the surrounding community. **Ms. Walden** stated that repair of the water lines has been included in this PA.

Ms. Walden stated meeting notes will be shared with the group and asked if there were any final comments/questions. The next meeting will resume at Stipulation V. There were no additional comments/questions.

Meeting adjourned.

Enclosure 3: Meeting Notes - 9 November 2021

Participants

Advisory Council on Historic Preservation (ACHP)

Rachel Mangum – Army Liaison

State Historic Preservation Division (SHPD)

Tamara Luthy – Ethnographer

U.S. Army Garrison – Hawaii (USAG-HI)

Alice Roberts – Chief, Conservation Branch

Laura Gilda – Archaeologist

Jacqueline Pamerleau-Walden – Archaeologist

Kara Allison – Cultural Resources Specialist, Contractor

Basannya Adepegba – Environmental Attorney, Office Staff Judge Advocate

Bobbie Escobar – Environmental Attorney, Office Staff Judge Advocate

Jillian Singleton – Chief, Business Operations Division – DFMWR

Paul Vasquez – Acting, Business Operations Manager DFMWR

Piliā‘au Army Recreation Center (PARC)

Diana Wendlinger – Business Operations Manager

Native Hawaiian Organization (NHO)

Christopher Oliveira – Marae Ha‘akoa

Glen Kila – Ko‘a Mana/Koa Ike

Agenda Item 1: Introductions

Meeting opened with roll call.

Agenda Item 2: Recap Previous Meeting

Ms. Walden recapped previous meeting and stated that this meeting will be continuing through and collecting comments on the draft of the Programmatic Agreement (PA) for the operation, maintenance, and modernization projects at Piliā'au Army Recreation Center (PARC). The meeting will start where the previous meeting left off, on Section V of the PA.

Stipulation V - Unanticipated Discoveries

Ms. Walden read through the section and asked if consulting parties could be notified via email instead of postal mail. **Mr. Kila and Mr. Oliveira** agreed that email could be the initial point of notification but requested that a copy also be sent out via postal mail as having a physical copy of any documentation was important. **Ms. Walden** clarified that the 15 calendar days comment period would start with notification by email and the postal mail would follow up. **Mr. Kila and Mr. Oliveira** agreed. **Mr. Oliveira** commented that he would like to review the existing NAGPRA comprehensive agreement for PARC.

Mr. Kila and Mr. Oliveira had no objections to this section and there were no other comments from the other participants.

Stipulation VI - Administrative Stipulations

Ms. Walden read through the section and asked for any comments. There were no objections or comments from any of the participating parties.

Stipulation VII - Appendices

Ms. Walden summarized the four appendices included in the PA. **Mr. Oliveira and Mr. Kila** asked if the petroglyph description was in Appendix A or Appendix B. **Ms. Walden** explained that the petroglyphs were part of Appendix A.

Ms. Walden stated that was the end of the draft and asked for any additional comments / questions before moving onto the appendices.

Ms. Luthy commented that she was not present for the previous meeting, but there might need to be a discussion about the proposed duration (15 years) of the PA as she knows Alan Downer generally prefers that PA's not last so long. **Ms. Walden** mentioned that the PA duration was discussed during the initial consultation meeting and that a longer period was chosen due to the time consultation can take. **Mr. Oliveira** agreed and commented he favored the longer period because of the amount of time discussions can take. There were no other objections or other comments.

Appendix A - Determination of Eligibility of Site 50-80-07-3998

Ms. Walden explained that Appendix A was discussed in the previous meeting and asked if there was any additional need to discuss it. All participants agreed that there was no further need to discuss the contents of Appendix A.

Appendix B - Determination of Eligibility of Constructed Properties at PARC

Ms. Walden summarized Appendix B and asked if there was a need to discuss. All participants agreed that there was no further need to discuss the contents of Appendix B.

Appendix C – Exempted Undertakings

Ms. Walden read through the section.

Mr. Oliveira expressed concerns over the potential ground disturbance involved in the routine maintenance and repair of existing sprinkler systems (Section I.B), particularly the installation and repair of the water line. **Ms. Walden** explained that the installation of the sprinkler system will have gone through the PA and the exempted activity will only cover the sprinkler heads and will not include the water line. As **Mr. Oliveira** still had concerns about the ground disturbance, **Ms. Singleton** suggested that Section I.B specify ground disturbance to a certain depth. **Ms. Gilda** followed up suggesting specifying ground disturbance will not exceed the previous disturbance or installation depth. **Ms. Walden** asked if Mr. Oliveira still had concerns. **Mr. Oliveira** said that if a clarifying sentence about limiting the ground disturbance to the existing area was added, he would be fine.

Mr. Kila and Mr. Oliveira adamantly opposed the inclusion of replacing road/roadways, sidewalks, and underground utilities on the list of exempted activities (Appendix C Section I.C and I.D). They stated that including these activities on the list implies that everything has been found and that is not the case. The seawall project was mentioned as an examples that showed how much has been missed. **Mr. Oliveira** stated that they probably would not need to go through a full consultation but they need to be made aware of what is going on. **Mr. Oliveira** further iterated that based on the past, he 100% does not agree with roadway replacements being on the exempted activities list. These projects need to go through a process.

Mr. Oliveira stated that, per the PA, it was possible to edit the Appendices and maybe in the future, if things improved, they might be willing to discuss adding such activities to the list of exempted undertakings. **Ms. Walden** noted comments.

Mr. Kila and Mr. Oliveira requested that Appendix C Section I.F specify no ground disturbance. **Ms. Walden** noted the comment.

All participating parties agreed that it was not necessary to discuss Appendix C Section II (Buildings – no ground disturbing activities).

Appendix D – Consulting Parties

Ms. Walden summarized the consulting parties included in the PA and requested clarification from **Mr. Kila** if he was representing both Ko'a Mana and Koa Ike. **Mr. Kila** stated 'yes'.

Ms. Walden stated meeting notes will be shared with the group and asked if there were any final comments/questions. There were no additional comments/questions.

Meeting adjourned.