

**LATE**

TO: Senator Carol Fukunaga, Chair,  
Senate Committee on Economic Development and Technology  
and  
Senator Donovan M. Dela Cruz, Chair, Senate Committee on Water, Land, and  
Housing

FROM: Sara L. Collins, Ph.D., Legislative Chair  
Society for Hawaiian Archaeology  
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HEARING: March 19, 2012, 1:45 PM, Conference Room 016

SUBJECT: Comments in Support of SCR 56, Requesting the Department of Land and  
Natural Resources to Develop Recommendations for Increased Fees to Help  
Support a Fully Staffed State Historic Preservation Division Program

I am Dr. Sara Collins, Chair of the Legislative Committee of the Society for Hawaiian Archaeology (SHA). We have over 150 members that include professional archaeologists and advocates of historic preservation in general. On behalf of SHA, I am providing comments in support of SCR 56, which requests the Department of Land and Natural Resources (DLNR) to develop recommendations for increased fees to help support a fully staffed State Historic Preservation Division (SHPD) program.

When the Hawaii Administrative Rules (HAR) governing the review process under Chapter 6E-7, 6E-8, and 6E-42, Hawaii Revised Statutes (HRS) were promulgated, the rules included fee schedules for the review of various reports and plans required for compliance purposes. In the years since HAR 13-275 and 13-284 have been in effect, it is clear that the fees charged for document review need to be revised in order to more accurately reflect the staff efforts involved in this important element of regulatory oversight. The subject resolution asks DLNR to develop recommendations for increased fees with assistance from the Society for Hawaiian Archeology, Historic Hawaii Foundation, advocates of historic preservation, and other interested parties.

We support SCR 56 and suggest that it be amended so as to encourage DLNR to include in its report to the Legislature the statistics on the numbers and types of documents currently reviewed, the fees received over that last three years, and rough estimates of staff time required. In order for fee increases to be realistic but not prohibitive, actual data should be available to support any such request.

We also have some minor, technical comments as follow:

- The resolution should also include HAR 13-275 since the same fee schedule is found at HAR 13-275-4.
- The HAR governing the review process were promulgated in December 2003, so the fees listed therein have been in effect for over eight years.

Thank you for the opportunity to provide comments in support of SCR 56. Should you have any questions, you may reach me at the above email address.