

EXHIBIT "27"

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September 15, 2017

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IN REPLY REFER TO:
Log No. 2017.02053
Doc. No. 1709JA05
Archaeology

Dear Ms. Kettley:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
Archaeological Inventory Survey Report for the AES Lawai Solar and Storage Project
Lāwai and Kōloa Ahupuaʻa, Kōloa District, Kauaʻi (Revised draft)
TMK: (4) 2-6-003:001 por.**

Thank you for submitting for review the revised draft *Archaeological Inventory Survey Report for the AES Lawai Solar and Storage Project, Lāwai and Kōloa Ahupuaʻa, Kōloa District, Kauaʻi*. TMK: 4-2-6-003:001 por. (Wilbey et al., September 2017). The State Historic Preservation Division (SHPD) received this submittal on September 12, 2017. The original draft archaeological inventory survey report (AISR) was received by SHPD on July 27, 2017. Revisions were requested by SHPD in a letter dated August 30, 2017 (Log No. 2017.01617, Doc. No. 1708JA09). We appreciate your prompt response.

This archaeological inventory survey report (AISR) was prepared by Cultural Surveys Hawaiʻi, Inc., (CSH) at the request of CH2M Hill, for (private) project proponent AES Distributed Energy, Inc., (AES DE) and affiliate AES Lawaʻi Solar, LLC. The AES Lawaʻi Solar and Storage project will involve construction and operation of a 28-megawatt (MW) direct-current (dc) / 20-MW alternating-current (ac) solar photovoltaic (PV) system with a 20-MW-5-hour Battery Energy Storage System (BESS) in Lāwai, near Kauaʻi's south shore. The 221-acre (89-hectare) project area, part of a 1,062-acre parcel, TMK: (4) 2-6-003:001, will be leased from owner Alexander & Baldwin, Inc. (A&B). AES Lawaʻi Solar, LLC, has executed a Power Purchase Agreement (PPA) with the (private, non-profit) Kauaʻi Island Utility Cooperative (KIUC); the required approval by the (State) Hawaiʻi Public Utilities Commission (PUC) will take approximately nine months to process. AES Lawaʻi Solar, LLC, seeks to obtain the required land-use and zoning permits in late 2017 or early 2018.

The project area is bounded by Lāwai town and Aepo Reservoir in the northwest, Kōloa Road in the north, the west bank of Aepo Reservoir in the southeast, and the southeast-trending Aka Road branch in the southwest. In the west, the project area is bounded by Kaupale Reservoir and an unnamed Lāwai Stream tributary that feeds Kaupale and Kumano Reservoirs. The property forms two areas, a north portion north of Aepo, Aepoalua, and Aepoekolu Reservoirs, and a south, larger, portion south of the reservoirs. Three narrow, north-south project-area crossings flank and pass between Aepoalua and Aepoekolu Reservoirs. The general area is dominated by the six reservoirs: Aepo, Aepoalua, and Aepoekolu, from northwest to southeast; Aepoeha, outside the property in the southeast; and Kaupale and Kumano, outside in the southwest. The most prominent features within the project area, both in the south portion, are two long ditches labeled No. 18 Reservoir Ditch and No. 19 Reservoir Ditch on the 1996 U.S. Geological Survey (USGS) Kōloa Quadrangle topographic map.

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No Land Commission Awards (LCAs) were awarded in the project area during Māhele. Lāwa'i Ahupua'a was awarded to James Young Kanehoa, the son of John Young. Kōloa Ahupua'a was controlled by the ruling chief of Kaua'i. The main role played by the project area in the 19th and early 20th centuries was as sugar plantation land. Beginning in 1835, the Koloa Sugar Company was the first plantation-organized industry in Hawai'i. Soon, three Kaua'i sugar plantations had extensive lands that included the project area. The western area belonged to McBryde Plantation, the eastern area to Koloa Plantation, and certain parcels to Grove Farm. In 1899 the three merged as the McBryde Sugar Company. All reservoirs and other water features in the area are reportedly associated with the McBryde plantation. Aepoalua, the first of the six reservoirs to be established, is shown under excavation in a 1910 USGS topographic map. The No. 18 and 19 Ditches are shown, but not labeled, on the 1912 USGS map of Kaua'i.


Seven previously documented properties were re-visited during the AIS; six are associated with State Inventory of Historic Places (SIHP) Site 50-30-10-1051. The first two are the No. 18 and No. 19 Reservoir Ditches, designated Site 1051 Features A and B during an earlier project (Hammatt and Shideler 2007). The four Aepo reservoirs, outside the project area and briefly re-visited, are designated Site 1051 Features E1-E4. The seventh previously documented property is Bennett's (1931) Site 73 (SIHP Site 50-30-10-0073), a boulder pile with interior wall remnants, now bulldozer-damaged, which was re-visited briefly in the south, outside the project area because of changes in plans since the AIS began. A clearing mound nearby is now designated Site 0073 Feature 1.

Thirty-two archaeological features were newly documented during the AIS. Fifteen features including, among others, culverts and sluice gates, are associated with Ditch 18 (Site 1051 Feature A) or Ditch 19 (Feature B) and are assigned alphanumeric feature designations (SIHP Site 1051 Features A1-A4, SIHP Site 1051 Features B1-B11) that connect them with the relevant ditch. Sixteen newly documented features associated with the plantation but not with the ditches are assigned alphanumeric designations within SIHP Site 1051. Site 1051 Features C1-C6 are plantation roads and associated features. Features D1 and D2 are field berms. Features E1-E6 include the four Aepo reservoirs, a spillway between Aepoalua and Aepoekolu Reservoirs, and a slab that may be part of a culvert between Aepoekolu and Aepoeha Reservoirs. Features F and G, both southeast outside the project area, include a ditch and a water-control pipe. The 32nd newly documented feature, also south outside the project area, is a boulder clearing mound near Bennett's (1931) Site 73 and, like it, recently bulldozed; the newly identified mound is Site 0073 Feature 1.

The AIS results support Hammatt and Shideler's (2007) evaluation of SIHP Site 50-30-10-1051 as a significant historic property under Criterion d, per Hawaii Administrative Rules (HAR) §13-284-6, for its potential to provide information regarding the sugarcane plantation agricultural system. SIHP Site 50-30-10-0073 (outside the project area) is not evaluated. SHPD concurs with the evaluation of Site 1051 as significant; with the project effect determination, "effect, with agreed upon mitigation commitments," per HAR §13-284-7(e); and with proposed mitigation, data recovery in the form of archaeological monitoring, per HAR §13-284-8(a)(1)(c). An archaeological monitoring plan (AMP) that satisfies the requirements of HAR §13-279-4 shall be prepared to guide monitoring. The AMP must be accepted by SHPD before work begins.

This revised draft AISR provides very good environmental, historical and mythological, and archaeological background information, and describes each historic property thoroughly and clearly. The revisions address the issues and concerns identified in our previous correspondence. The report meets the minimum requirements of HAR §13-276-5. **It is accepted.** Please send two hardcopies of the document, clearly marked FINAL, along with a text-searchable PDF version to the Kapolei SHPD office, attention SHPD Library.

Aloha,



Susan A. Lebo, PhD
Archaeology Branch Chief

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David Shideler, CSH, dshideler@culturalsurveys.com