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STATE HISTORIC PRESERVATION DIVISION
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February 9, 2018

Ka'aina Hull
Deputy Planning Director, Planning Department
Kaua'i County Planning Commission
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Lihue, Hawai'i 96766-1326
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Riley Hakoda
State Land Use Commission
235 Beretania Street #406
Honolulu, Hawai'i 96813
Email: Riley.k.hakoda@hawaii.gov

Dear Ka'aina Hull and Riley Hakoda:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –
Draft Archaeological Monitoring Plan for the AES Lawa'i Solar and Storage Project
Lawa'i and Kōloa Ahupua'a, Kōloa District, Island of Kaua'i
TMK: (4) 2-6-003:001 por.**

The following is the State Historic Preservation Division's (SHPD's) review of the draft plan titled, *Draft Archaeological Monitoring Plan for the AES Lawa'i Solar and Storage Project, Lawa'i and Kōloa Ahupua'a, Kōloa District, Kaua'i TMK: [4] 2-6-003:001 por.* (Kamai et al., November 2017). SHPD received this plan November 27, 2017.

The draft archaeological monitoring plan (AMP) was prepared by Cultural Surveys Hawai'i, Inc. at the request of CH2M Hill and on behalf of the project proponent, AES Distributed Energy, Inc. (AES DE) and its affiliate AES Lawa'i Solar, LLC. The proposed project will consist of an approximately 28 MW direct current (DC) / 20 MW alternating current (AC) ground-mounted solar PV system, coupled with a 20 MW – 5 hour (100 MWh) BESS, and related interconnection and ancillary facilities. The major components will include solar PV panels, BESS containers, inverters, and a project substation; these components will occupy a total of 196 acres. Additionally, the project will include two construction staging areas totaling approximately 14 acres. Ground disturbing activities will include bulldozing, grading, trenching, and excavations.

The project area comprises two large areas, formerly cane lands and pineapple fields, on either side of the Aepo reservoirs. The AES Lawa'i Solar and Storage project area was subject to an archaeological inventory survey (AIS) (Willey et al. 2017). A total of two site complexes, State Inventory of Historic Places (SIHP) # 50-30-10-01051 and -00073, were identified and documented. The project area was adjusted to avoid several features.

The AIS report was reviewed and accepted by SHPD in a letter dated September 15, 2017 (Log No. 2017.02053, Doc. No. 1709JA05). The results of the AIS were included in the petition for a Special Use Permit, which is subject to approval by the Kaua'i County Planning Commission and the Hawai'i State Land Use Commission. The AIS

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Archaeology

report indicates a project effect determination of, "effect, with agreed upon mitigation commitments". Per HAR §13-284-8(a)(1)(C), the proposed mitigation is data recovery in the form of archaeological monitoring.

The AMP outlines the fieldwork methods, laboratory analyses, and the protocols to be followed prior to, during, and after the completion of the proposed project. The AMP stipulates the following:

- The archaeologist will conduct a pre-construction prior to construction activities to inform project personnel of the stipulations outlined in the AMP;
- An on-site archaeologist will monitor all ground disturbing activities during the project and shall document representative stratigraphy from across the project area as well as all subsurface archaeological deposits encountered during the project;
- In the event that non-burial historic properties are identified during monitoring the archaeologist shall have the authority to temporarily suspend construction activities in the area of the find to allow the archaeologist to identify and appropriately document the non-burial find in accordance with reporting requirements specified in HAR §13-279. SHPD archaeologists shall be consulted regarding the identification, appropriate documentation, and assessment of the site significance; and
- In the event that human remains (burials or isolated, displaced skeletal elements) are inadvertently encountered, all work shall cease in the vicinity of the find, the area and human remains will be secured, and the archaeologist will immediately notify the SHPD and compliance and procedures outlined in HAR §13-300-40 will be followed.

The archaeological monitoring plan meets the requirements of HAR §13-279-4. **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.

SHPD requests to be notified at the start of archaeological monitoring. Upon completion of archaeological monitoring fieldwork, SHPD looks forward to reviewing an archaeological monitoring report meeting the requirements of HAR §13-279-5.

Please contact Stephanie Hacker, Oahu Archaeologist, at (808) 692-8046 or at Stephanie.Hacker@hawaii.gov for matters regarding archaeological resources or this letter.

Aloha,



Alan S. Downer, PhD
Deputy State Historic Preservation Officer
Administrator, State Historic Preservation Division

cc: William Folk, Cultural Surveys Hawai'i, Inc. (wfolk@culturalsurveys.com)
Lisa Kettley, CH2M (Lisa.Kettley@ch2m.com)