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April 24, 2015

Chris Monahan, PhD, Principal
TCP Hawai'i LLC
333 Aoloa Street, #303
Kailua, HI 96734

LOG NO: 2014.04229
DOC NO: 1504GC15
Archaeology, Architecture

Dear Dr. Monahan:

**SUBJECT: Chapter 6E-42 Historic Preservation Review
Archaeological Inventory Survey of 1,395 Acres of Kamehameha Schools' Lands
Waiawa and Waipi'o Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-4-006:034, 035, 036, 037; 9-6-004:024, 025, 026; 9-6-005:001**

Thank-you for the opportunity to review the draft report titled *Archaeological Inventory Survey of 1,395 Acres of Kamehameha Schools' Land in Waiawa and Waipi'o Ahupua'a, 'Ewa District, O'ahu Island, Hawai'i* (Monahan, September 2014). We received this submittal on September 16, 2014; revised materials on January 10, 2015, and on March 23, 2015. SHPD requested an archaeological inventory survey be conducted due to the potential for proposed project plans to affect historic properties (June 12, 2014; Log No. 2014.02357, Doc. No. 1405GC14). The landowner, Kamehameha Schools (KS), proposes to develop a 50 megawatt solar facility on a portion of the property.

The archaeological inventory survey (AIS) provided surface coverage of the entire 1,395-acre project area which included two existing access roads and two proposed utility tie-ins. Subsurface testing consisted of a single hand-excavated unit placed to examine whether a small, dry-stacked terrace in Gulch C (Site 50-80-09-2273, Feature 21) was pre-Contact or plantation-era in age and association. Large-scale non-historic properties identified within the project area include recent earthen roads with low berms formed when the roads were graded or scraped; evidence of recent modification by civil engineers to control flooding of the landscape near two of the old reservoirs, Gulch C (Reservoir 3 on historic maps) and Gulch B (Reservoir 1-A on historic maps), and a long, heavily-built earthen berm in the northwest portion of the property, north of Gulch A, in an area of former workers' camp.

The AIS indicates that three previous archaeological surveys have included portions of the current project area (Barrera 1987, Goodman and Nees 1991, and Thurman et al. 2012). Portions of a data recovery project also extended into the current project area (Sinoto and Pantaleo 1994, 1995). Five historic properties (Sites 50-80-09-2262, 2270, 2271, 2272, and 2273) have been documented within or extending into the current project area. Of these, three were further documented during the current AIS (Sites 2270, 2271, and 2273); not further documented were Site 2262 (a small lithic scatter) and Site 2272 (WWII and later military concrete buildings and stock pile areas); Site 2262 was fully collected during the Goodman and Nees (1991) survey, and no evidence was found of possible Site 2272 features within the three areas previously identified in Figure 7 as having been used for military storage. Based on the current AIS documentation, Site 2270 is a network of roads and railroad right-of-ways consisting of 28 features, Site 2271 is the remains of workers' camps and other facilities represented by two extant features, and Site 2273 is an irrigation system consisting of 25 features. The most significant features of Site 2271—the Japanese cemetery (Feature 3) and the cannery (Feature 1)—were subject to data recovery work by Sinoto and Pantaleo (1994, 1995). No historic properties were newly identified during the current AIS.

Pursuant to Hawaii Administrative Rule (HAR) §13-284-6, Site 2270 is assessed as significant under Criterion d for its informational value regarding geospatial location, extent, and character of the plantation roads and temporary railroad in Waiawa built around or just after the turn of the 19th/20th century. Site 2273 is assessed as significant under Criterion c for its distinctive construction method and Criterion d for its information value. Like Site 2270, Site 2273 provides important data on geospatial location, extent, and character of the plantation irrigation infrastructure in Waiawa Uka built by the Oahu Sugar Company and its association with the nearby Waiāhole Ditch System (upslope and *mauka* of the current project area). Site 2271 Feature 1 (structural remnants) is assessed as significant under Criterion d for its information content relative to plantation working conditions in the early to middle 20th century, while Site 2271 Feature 2 (camp debris) is assessed as not significant. Per HAR §13-284-7, the project effect determination is “effect, with proposed mitigation commitments.” Of the three historic properties, no further work is recommended for Site 2270 and Site 2271 which are assessed as having yielded their informational and research value. The proposed mitigation is “*preservation of certain features of Site 2273.*” The specific features are: (1) Feature 22, a large water-distribution and -retention basin of the plateau east of Gulch A, and one of the most formal structures in the project area; (2) a representative section of Feature 23, the cut basalt and mortar irrigation ditch leading into the Feature 22 basin; (3) Feature 19, a large dam-like retention structure in the west end of Gulch B; and (4) a representative section of Feature 14, Sub-feature 3, the cut basalt and mortar irrigation ditch draining into Gulch B and directly associated with the Feature 19 dam. We concur with the site significance assessments and the mitigation commitments.

The AIS report provides an excellent discussion of the project area, physical environs and cultural history background, previous investigations, the project methods and findings, and the site significance assessments and mitigation recommendations. The report meets the requirements of HAR §13-276-5. **It is accepted by SHPD.** Please send one hardcopy of the document, clearly marked FINAL, along with a copy of this review letter and a text-searchable PDF version on CD to the Kapolei SHPD office, attention SHPD Library.

As stipulated in HAR §13-284-7(e), when SHPD comments that the project will have an “effect, with agreed upon mitigation commitments,” then detailed mitigation plans shall be developed for SHPD review and acceptance. Per HAR §13-284-8(a)(1)(A), the agreed-upon mitigation measure for this project is preservation of specific features of Site 2273. Pursuant to HAR §13-284-8(e)(5), we look forward to receiving an archaeological preservation plan that meets HAR §13-277.

Please contact Jessica Puff at (808) 692-8023 or at Jessica.L.Puff@hawaii.gov if you have any questions or concerns regarding architectural features. Please contact me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions or concerns regarding this letter.

Aloha,



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Acting Archaeology Branch Chief