

**Jeannie A. Hirabara**

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**From:** Chris Monahan <mookahan@gmail.com>  
**Sent:** Friday, July 19, 2019 3:36 PM  
**To:** DLNR.Intake.SHPD; Lebo, Susan A  
**Cc:** Tracy Camuso; kafronda@ksbe.edu; Joshi, Aarty; Park, Nicola  
**Subject:** SHPD 6E form submittal Waiawa PV Solar project TMK (1) 9-6-004:024 (por.), 025 (por.) & 026 (por.)  
**Attachments:** 19 July 2019 SHPD 6E form.pdf

Aloha Susan,

On March 12, 2019, we emailed you this message with an earlier version of the subject SHPD 6E form submittal. At that time, we wrote (bold text):

**Attached here for your review is a request for SHPD concurrence of determination of effect for the Waiawa Solar Power project. As you may recall, we met at Kalanimoku about this project and process last month (2/14/19). There is a pair of plantation-era features in the current proposed project area that are subject to preservation, based on AIS work (and a subsequent Preservation Plan following from it) TCP Hawai'i completed for KS (landowner) in 2015.**

**Based on our discussion last month, the attachment consists of:**

- 1. Cover letter requesting SHPD concurrence**
- 2. Completed SHPD HRS 6E Submittal Form**
- 3. Attachments to the submittal form with map figures, prior relevant SHPD review letters, and a letter of commitment from the project proponent (Waiawa Solar Power LLC, a subsidiary of Clearway Energy Group LLC) regarding the installation of preservation site buffer fencing. For your information, we (TCP Hawaii) are currently under contract to install the preservation buffer fencing.**

**The Waiawa Solar Power project will soon be the subject of Land Use Commission proceedings, and we have included the Docket # for the LUC in the attached SHPD HRS 6E Submittal Form.**

**Please let me know if you have any questions, or if you need any additional information or revisions to complete this request for SHPD concurrence.**

The purpose of the current email is to provide you with an updated/revised submission that has more details and a final site plan map that was not included in the original attachment to the form. Also, the overall project acreage has been changed from (previous) 185 acres, to 200 acres (current) to reflect the access roads needed to complete the PV solar project.

After the March, 2019, submission, we went out and installed the preservation buffer fencing around the preservation site-features in April, 2019. Documentation of this effort is also included in the attachment to the form.

With this submittal, we seek SHPD's concurrence of determination of effect for this project.

Please let me know if you have questions or need more information.

Chris

KS Exhibit 20

TCP Hawaii, LLC  
150 Hamakua Dr., #810  
Kailua, HI 96734  
(808) 754-0304



**TCP Hawai'i, LLC**

**Documenting Traditional Cultural Properties of Hawai'i  
Preserving and Restoring Cultural and Natural Resources of Hawai'i**

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July 19, 2019

**To: Susan Lebo, Ph.D., Archaeology Branch Chief, State Historic Preservation Division (SHPD)**  
**Re: Request for Concurrence on HRS § 6E-42 Effect Determination for Waiawa Solar Power Project, Waiawa Ahupua'a, O'ahu, TMK (1) 9-6-004:024 (por.), 025 (por.) & 026 (por.)**

Aloha Dr. Lebo,

On behalf of the project proponent (Waiawa Solar Power LLC, a subsidiary of Clearway Energy Group LLC [Applicant]) and landowner (Kamehameha Schools [KS]), and in anticipation of the proposed project's Land Use Commission review (LUC's Order in Docket # A87-610), we formally request your HRS § 6E-42 concurrence with the effect determination for the Waiawa Solar Power Project.

Enclosed for your reference is HRS 6E Submittal Form (with map figures and other attachments) stating the proposed project will have an "Effect, with agreed upon mitigation commitments," and that the mitigation will be the preservation of State Inventory of Historic Places (SIHP) # 50-80-09-2273, Features 22 and 23 (portion).

The proposed project is restricted to a 200-acre area (see map figures attached to HRS 6E Submittal Form), plus improved "cane haul" access roads, within a larger (1,395-acre) area that was subject to a formal HAR § 13-276 Archaeological Inventory Survey (AIS) accepted by SHPD in a letter (Log No: 2014.04229, Doc No: 1504GC15) dated April 24, 2015. The AIS project area included and subsumes the subject project area. In fulfillment of historic-preservation mitigation for the AIS project area, the SHPD accepted a formal HAR § 13-277 Archaeological Preservation Plan (PP) in a letter (Log No: 2015.01827, Doc No: 1509SL01) dated September 14, 2015. Both the AIS report and PP were completed by TCP Hawai'i on behalf of the landowner (KS).

In a letter dated March 12, 2019, submitted to SHPD with the attached HRS 6E Submittal Form, the Applicant formally committed to the following actions: (1) install preservation buffer fencing around SIHP # 50-80-09-2273, Features 22 and a portion of Feature 23, in accordance with the specifications in the PP; (2) notify SHPD in a letter memo with photographic documentation once the fencing has been installed; and (3) maintain the preservation fencing in good working order throughout the duration of the proposed construction. Since that submittal, TCP Hawai'i (Chris Monahan) completed installation of the preservation buffer fencing in April, 2019 (per item #1) and with this submittal, is providing photographic documentation (per item #2; see letter documentation attached).

With these conditions, we hereby request the SHPD's formal (in writing) concurrence on the aforementioned effect determination, and thank you for your assistance.

With aloha,

Christopher M. Monahan, Ph.D.  
TCP Hawai'i, 150 Hamakua Dr., #810, Kailua, HI 96734  
(808) 754-0304 [mookahan@gmail.com](mailto:mookahan@gmail.com)

c: Aarty Joshi, Clearway Energy Group LLC  
Nicola Park, Clearway Energy Group LLC  
Kalani Fronda, Kamehameha Schools  
Tracy Camuso, G70

**State Historic Preservation Division  
HRS 6E Submittal Form**

Per §6E, Hawai'i Revised Statutes, if the Project requires review by the State Historic Preservation Division (SHPD), please review and fill out this form and submit all requested information to SHPD. Please submit this form and project documentation **electronically** to:

dlmr.intake.shpd@hawaii.gov

If you are unable to submit electronically, please contact SHPD at (808) 692-8015. Mahalo.

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The submission date of this form is:

**1. APPLICANT** (select one)

☒ Property Owner      ☐ Government Agency

**2. AGENCY** (select one)

☐ Planning Department      ☐ Department of Public Works      ☒ Other (specify): Land Use Commission

Type of Permit Applied For: LUC Application for Waiawa Solar Power Project

**3. APPLICANT CONTACT**

3.1) Name: Kalani Fronda      3.2) Title: Sr. Land Assets Manager, Kamehameha Schools  
3.3) Street Address: 567 S. King St., Ste. 200, Honolulu  
3.4) County: Honolulu      3.5) State: Hawaii      3.6) Zip Code: 96813  
3.7) Phone: (808) 523-6244      3.8) Email: kafronda@ksbe.edu

**4. PROJECT DATA**

4.1) Permit Number (if applicable): LUC's Order in Docket # A87-610  
4.2) TMK [e.g. (3) 1-2-003:004]: (1) 9-6-004:024 (por.), 025 (por.) & 026 (por.)  
4.3) Street Address: not applicable - undeveloped land  
4.4) County: Honolulu      4.5) State: Hawaii      4.6) Zip Code: not applicable  
4.7) Total Property Acreage: 1,395 acres  
4.8) Project Area (acreage, square feet): 200 acres  
4.9) List any previous SHPD correspondence (LOG Number & DOC Number, if applicable): **See attachment for these letters**  
LOG NO. 2014.04229 (AIS acceptance)      DOC NO. 1504GC15 (AIS acceptance)  
2015.01827 (Pres. Plan accept.)      1509SL01 (Pres. Plan accept.)

**5. PROJECT INFORMATION**

5.1) Does the Project involve a Historic Property? A Historic Property is any building, structure, object,

district, area, or site, including heiau and underwater site, which is over 50 years old (HRS §6E-2).

☒ Yes ☐ No

5.2) The date(s) of construction for the historic property (building, structure, object, district, area, or site, including heiau and underwater site) is Circa 1925

5.3) Is the Property listed on the Hawai'i and or National Register of Historic Places? To check:  
<http://dlnr.hawaii.gov/shpd/>

☐ Yes ☒ No

5.4) Detailed Project Description and Scope of Work:

The proposed project will involve improving several existing "cane haul" roads, and installing hundreds of solar panels mounted on frames and posts that will be driven into the subsurface using "pile driver" technology; there will also be concrete footings built at or just below grade.

5.5) Description of previous ground disturbance (e.g. previous grading and grubbing):

As documented in a 2015 AIS report by Monahan (accepted by the SHPD on April 24, 2015), the entire Project Area has been severely impacted/alterd by commercial agriculture (sugar cane), including not only chain-dragging/grubbing but also a century of mechanized plowing.

5.6) Description of proposed ground disturbance (e.g. # of trenches, Length x Width x Depth):

There are no specific civil engineering (ground-disturbance) plans at this time; however, the entire Project Area was included in the 2015 AIS that was accepted by the SHPD. According to the AIS, and a subsequent Preservation Plan (also accepted by the SHPD), sufficient data has been obtained for all historic properties and component features in the Project Area.

5.7) The Agency shall ensure whether historic properties are present in the project area, and, if so, it shall ensure that these properties are properly identified and inventoried. Identify all known historic properties:

This work has already been completed, and accepted by SHPD. Project area includes component features of plantation-era SIHP #s 50-80-09-2270 ("cane haul" roads) and -2273 (irrigation complex)

5.8) Once a historic property is identified, then an assessment of significance shall occur.

Integrity (check all that apply):

☒ Location ☒ Design ☒ Setting ☒ Materials ☒ Workmanship ☒ Feeling ☒ Association

Criteria (check all that apply):

- ☐ a – associated with events that have made an important contribution to the broad patterns of our history
- ☐ b – associated with the lives of persons important in our past
- ☒ c – embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; or possess high artistic value
- ☒ d – have yielded, or is likely to yield, information important for research on prehistory or history
- ☐ e – have an important value to the Native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out or still carried out, at the property or due to associations with traditional beliefs, events, or oral accounts - - these associations being important to the group's history and cultural identity

5.9) The effects or impacts of a project on significant historic properties shall be determined by the agency.

Effect Determination (select one):

**Note: The result of the AIS was that 4 features of SIHP # -2273 (i.e., 14 [por.], 19, 22 & 23 [por.]) would be preserved. These 4 features were the subject of 2015 Preservation Plan, accepted by SHPD on 9/14/2015**

- ☐ No Historic Properties Affected  
☒ Effect, with Agreed Upon Mitigation Commitments (§6E-42, HRS)  
☐ Effect, with Proposed Mitigation Commitments (§6E-8, HRS)

5.10) This project is (check all that apply, if applicable): **None of these**

- ☐ an activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency;  
☐ carried out with Federal financial assistance; and or  
☐ requiring a Federal permit, license or approval.

If any of these boxes are checked, then the Project may also be subject to compliance with Section 106 of the National Historic Preservation Act (NHPA).

## 6. PROJECT SUBMITTALS

6.1) Please submit a copy of the Tax Map Key (TMK) map **See Attachment (Figure 1)**

6.2) Please submit a copy of the property map showing the project area and indicate if the project area is smaller than the property area. **See Attachment (Figure 1)**

6.3) Please submit a permit set of drawings. A permit set is a set of drawings prepared and signed by a licensed architect or engineer and is at least 65% complete. **Not currently available**

6.4) Are you submitting a survey?

☒ Yes ☐ No

Specify Survey: AIS for entire (1,395-acre) property (landowner KS) completed/accepted in 2015

6.5) Did SHPD request the survey?

☐ Yes ☐ No **AIS was completed in 2015 in anticipation of the need for an LUC application**

If 'Yes', then please provide the date, SHPD LOG NO, and DOC NO:

Date: April 24, 2015

LOG NO. 2014.04229

DOC NO. 1504GC15

6.6) **SURVEY REVIEW FEES.** Fee for Review of Reports and Plans (§§13-275-4 and 284-4). A filing fee will be charged for all reports and plans submitted to our office for review. Please go to:

<http://dlnr.hawaii.gov/shpd/about/branches/archaeology/filing-fee-schedule/>

A check payable to the Hawaii Historic Preservation Special Fund should accompany all reports or plans submitted. **This was all completed in 2015**

6.7) Please submit color photos/images of the Historic Property (any building, structure, object, district, area, or site, including heiau and underwater site) that will be affected by the Project. **Previously documented in SHPD-approved Preservation Plan (Monahan 2015)**

The following are the minimum number and type of color photographs required:

Quantity	Description
1-2	Street view(s) of the resource and surrounding area
1-2	Over view of exterior work area
1	exterior photo of the North elevation (if applicable)
1	exterior photo of the South elevation (if applicable)
1	exterior photo of the East elevation (if applicable)
1	exterior photo of the West elevation (if applicable)
1-2	interior photos(s) of areas affected (if applicable)

#### CHECKLIST

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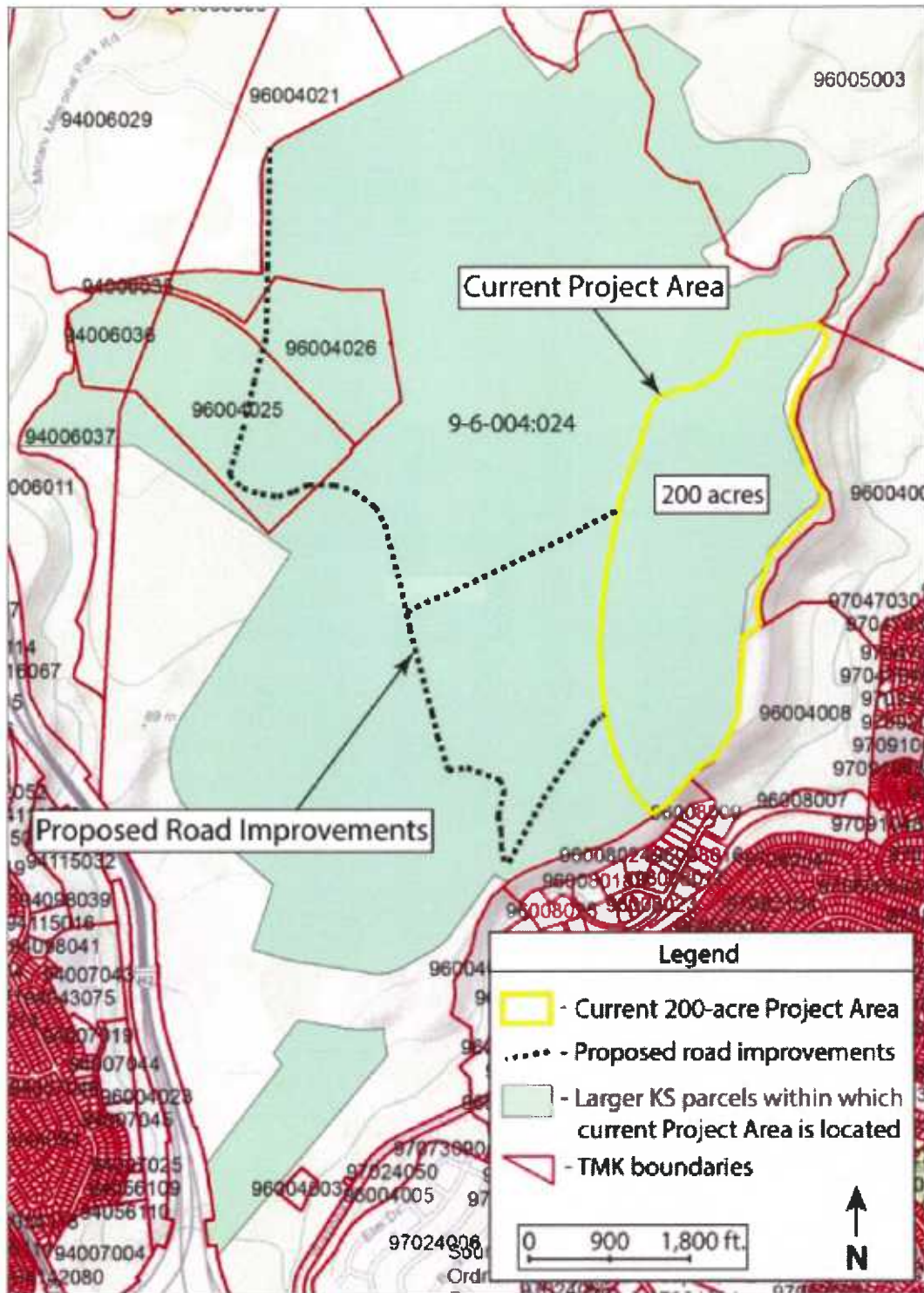
- ☒ **SHPD FORM 6E** (this form)
- ☒ **PROJECT SUBMITTALS** (any requested documentation for items 6.1 - 6.7 of this form)
- ☐ **FILING FEE FORM** (if applicable)

## **ATTACHMENT – WAIAWA SOLAR POWER PROJECT**

This attachment includes:

- (1) TMK map of the current Project Area (Figure 1, p. 2);
- (2) Detail map of archaeological preservation sites in relation to current Project Area (Figure 2, p. 3);
- (3) SHPD acceptance letter of the 2015 AIS that included the current Project Area (pp. 4-5);
- (4) SHPD acceptance letter of the 2015 Preservation Plan that included the current Project Area (pp. 6-7);
- (5) Formal written commitment letter (pp. 8-9) dated March 12, 2019, from Waiawa Solar Power LLC, a subsidiary of Clearway Energy Group LLC (Applicant), to install temporary preservation buffer fencing around State Inventory of Historic Places (SIHP) # 2273, Features 22 and 23 (portion) prior to the start of ground disturbing activities, and to maintain the temporary preservation buffer fencing around SIHP # 2273, Features 22 and 23 (portion) throughout the duration of construction activities in the current Project Area.
- (6) Final overall site plan map showing current Project Area, proposed access roads, and utility tie-ins. (Figure 3, p. 10)
- (7) 16 April 2019 letter memorializing installation of preservation buffer fencing around the preservation sites (p 11-14).





**Figure 1. TMK map of the Current Project Area (200-acre yellow polygon) with proposed road improvements (black dashed line) in relation to larger (1,395-acre) Kamehameha Schools property (green)**

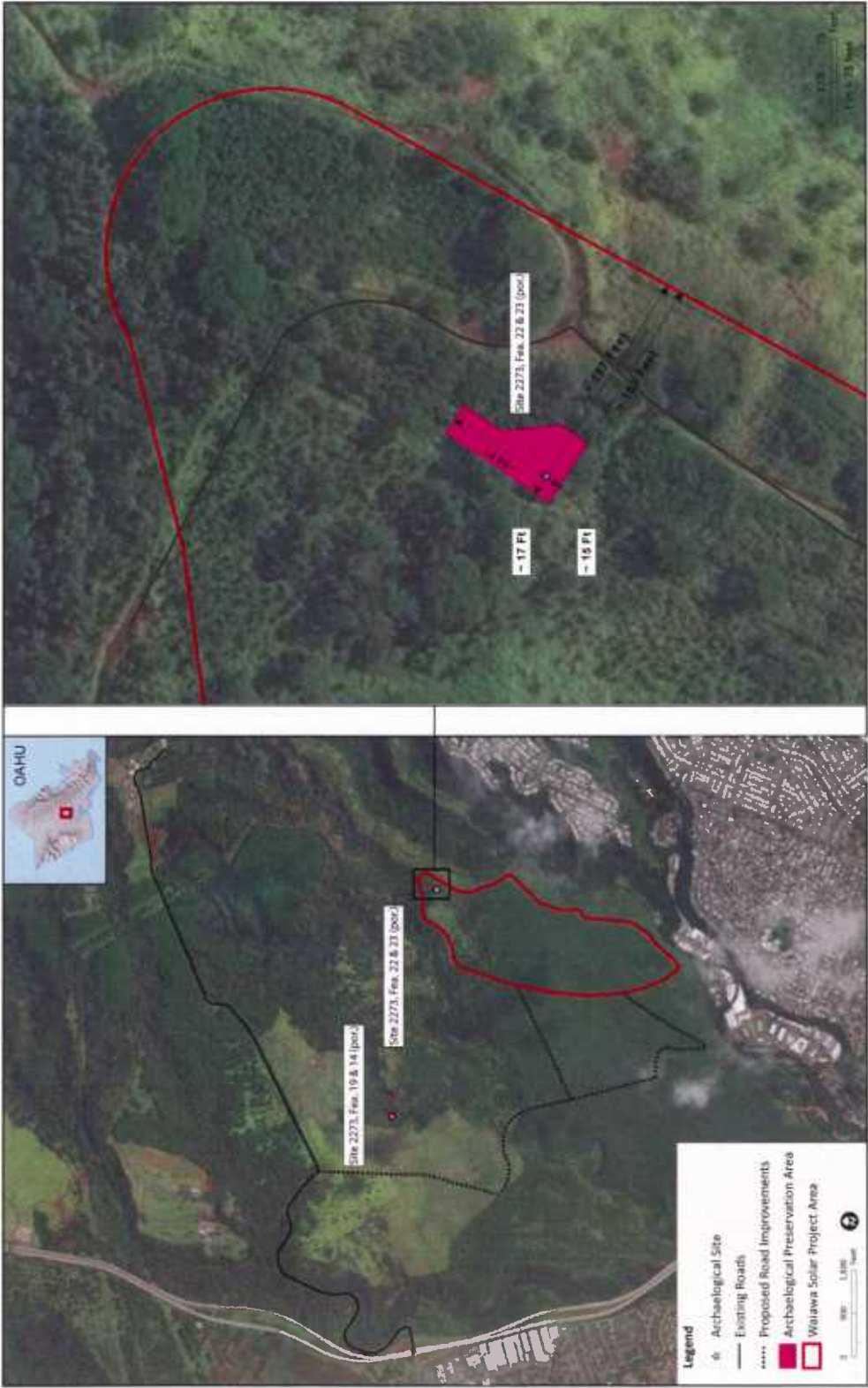


Figure 2. Detail view of the site-features subject to preservation according to the 2015 Archaeological Preservation Plan; the current Project Area is represented by the red polygon



DAVID Y. IGE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
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W. ROY HARDY  
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ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

April 24, 2015

Chris Monahan, PhD, Principal  
TCP Hawai'i LLC  
333 Aoloo 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  
Walawa 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.

Dr. Monahan  
 April 24, 2015  
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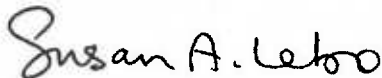
Pursuant to Hawaii Administrative Rule (HAR) §13-284-6, Site 2270 is assessed as significant under Criterion d for its informational value regarding geospatial location, extent, and character of the plantation roads and temporary railroad in Waiawa built around or just after the turn of the 19<sup>th</sup>/20<sup>th</sup> 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 20<sup>th</sup> 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](mailto: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](mailto:Susan.A.Lebo@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha,



Susan A. Lebo, PhD  
 Oahu Lead Archaeologist  
 Acting Archaeology Branch Chief

DAVID Y. IGE  
GOVERNOR OF HAWAII



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
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FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAPOLAIA ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

September 14, 2015

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

Log No. 2015.01827  
Doc. No. 1509SL01  
Archaeology

Dear Dr. Monahan:

SUBJECT: Chapter 6E-42 Historic Preservation Review  
Archaeological Preservation Plan for State Site No. 50-80-09-2273,  
Features 14 (portion), 19, 22, and 23 (portion), Kamehameha Schools' Land  
Walawa Ahupua'a, 'Ewa District, Island of O'ahu  
TMK: (1) 9-4-004:024 portion

Thank you for the opportunity to review the draft report titled *Archaeological Preservation Plan State Site No. 50-80-09-2273 Features 14 (Portion), 19, 22 & 23 (Portion) Kamehameha Schools' Land in Waiawa Ahupua'a, 'Ewa District, O'ahu Island, Hawai'i TMK (1) 9-4-004:024 (portion)* (Monahan, May 2015). We received this submittal on May 12, 2015; we apologize for the delay and thank you for your patience. 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 (Monahan, September 2014) was reviewed and accepted by SHPD on April 24, 2015 (Log No. 2014.04229, Doc. No. 1504GC15).

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 accepted AIS report (Monahan 2015) indicated 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 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 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. Monahan (2015) indicates that no historic properties were newly identified. 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

Dr. Monahan  
September 14, 2015  
Page 2

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).

Pursuant to Hawaii Administrative Rule (HAR) §13-284-6, Monahan (2015) assessed Site 2270 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 19<sup>th</sup>/20<sup>th</sup> century. Site 2273 was 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) was assessed as significant under Criterion d for its information content relative to plantation working conditions in the early to middle 20<sup>th</sup> century, while Site 2271 Feature 2 (camp debris) was assessed as not significant. Per HAR §13-284-7, the project effect determination was “effect, with proposed mitigation commitments.” Of the three historic properties, no further work was recommended for Site 2270 and Site 2271 which were assessed as having yielded their informational and research value. The proposed mitigation was “*preservation of certain features of Site 2273*.” SHPD concurred with the site significance assessments and the mitigation commitments, and the development of an archaeological monitoring plan meeting the requirements of HAR §13-277.

The archaeological preservation plan (PP) indicates that preservation includes: (1) a representative section (100 ft [30 m]) of Feature 14, the cut basalt and mortar irrigation ditch draining into Gulch B and directly associated with the Feature 19 dam; (2) the entirety of Feature 19, a large dam-like retention structure in the west end of Gulch B; (3) the entirety of Feature 22, a large water-distribution and water-retention basin on the plateau east of Gulch A, and one of the most formal structures in the project area; and (4) a representative section (75 ft [25 m]) of Feature 23, the cut basalt and mortar irrigation ditch leading into the Feature 22 basin. Preservation will be in the form of “avoidance and protection” and will involve a 10-ft (3 m) buffer around all features or portions of preserved features, except one side of Feature 22 (east side). The buffers will be marked by permanent fencing. No vegetation clearance is anticipated/planned within the buffers. In addition, no signage or access is planned. Periodic monitoring of the preserves will be conducted by the landowner or their representatives.

The preservation plan meets the requirements of HAR 13-277. 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.

Please contact me at (808) 692-8019 or at [Susan A Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha.



Susan A. Lebo, PhD  
Archaeology Branch Chief

**Clearway Energy Group**  
100 California Street, Floor 4  
San Francisco, CA 94111

clearwayenergygroup.com



March 12, 2019

Susan Lebo, Ph.D  
Archeology Branch Chief, State Historic Preservation Division  
601 Kamokila Blvd. Room 555  
Kapolei, Hawaii 96707

**Re: Formal Commitment to Install and Maintain Preservation Buffer Fencing at State Inventory of Historic Place # 50-80-09-2273, Features 22 & 23 (portion), Waiawa Solar PV Project (TMK [1] 9-6-004:024), Waiawa Ahupua'a, O'ahu Island; HRS § 6E-42 Review**

Aloha Dr. Lebo,

Waiawa Solar Power LLC, a subsidiary of Clearway Energy Group LLC (Applicant), is proposing to develop and operate the Waiawa Solar Project on O'ahu. The purpose of this letter is to formalize our commitment to install and maintain preservation buffer fencing at Site 2273, Features 22 & 23 (portion), in accordance with the specifications in an Archaeological Preservation Plan (Monahan 2015) completed by the landowner (Kamehameha Schools) that was accepted by the SHPD in a letter (Log No. 2015.01827, Doc No. 1509SL01) dated September 24, 2015.

The subject letter supports a request for concurrence to SHPD from the landowner, per (attached) HRS 6E Submittal Form, that the Solar PV Project by the project proponent (Applicant) will have an "Effect, with agreed upon mitigation commitments," and that the mitigation will be the preservation, in perpetuity, of SIHP # 50-80-09-2273, Features 22 and a portion of 23.

The (attached) HRS 6E Submittal Form, in turn, supports the landowner's Land Use Commission's Order in Docket # A87-610.

Although the proposed construction is not planned to begin for another two or three years, we will install temporary construction fencing to act as preservation buffer to ensure that project-related studies and investigations that are required to support project design and permitting do not disturb Features 22 and a portion of 23. We will maintain the preservation buffer fence during the study period and will re-confirm the integrity of the fence prior to the start of ground-disturbing work. We will install the preservation buffer fencing around SIHP # 50-80-09-2273, Features 22 and a portion of Feature 23, in accordance with the specifications in the aforementioned plan; and we will notify the SHPD in a letter memo with photographic

Attachment to SHPD HRS 6E Submittal Intake Form –Waiawa Solar Power (19 July 2019)



documentation that the fencing has been installed. The preservation fencing will then be maintained in good working order throughout the duration of the proposed construction.

Should you have any questions, please do not hesitate to contact our cultural resources consultant Chris Monahan of TCP Hawai'i at (808) 754-0304, or myself at (415) 627-4656, Aarty.Joshi@ClearwayEnergy.com.

Sincerely,



Aarty Joshi

Senior Manager, Environmental Permitting

c: Nicola Park, Clearway Energy Group LLC  
Kalani Fronda, Kamehameha Schools  
Tracy Camuso, G70  
Chris Monahan, TCP Hawai'i



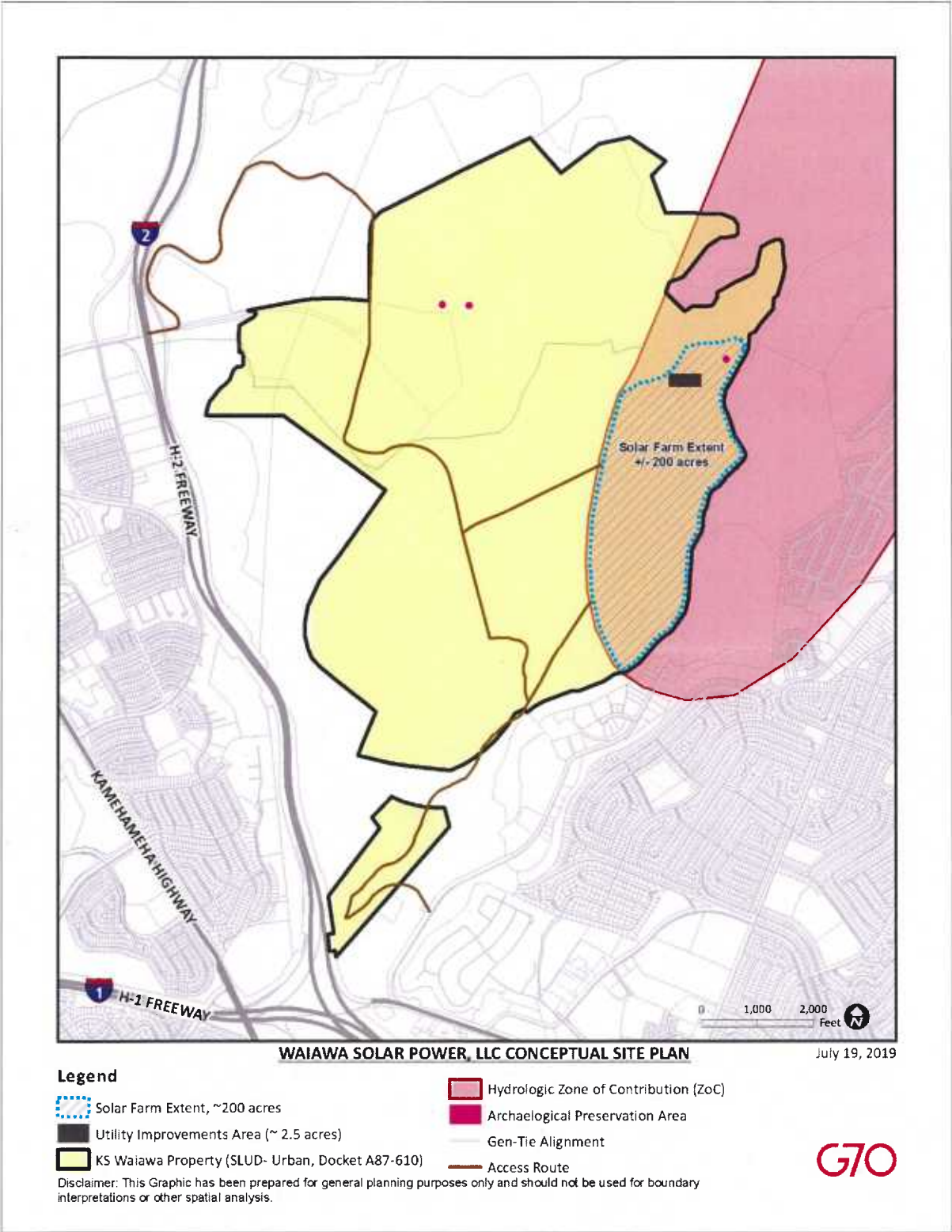


Figure 3. Final overall site plan



**TCP Hawai'i, LLC**

**Documenting Traditional Cultural Properties of Hawai'i  
Preserving and Restoring Cultural and Natural Resources of Hawai'i**

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April 16, 2019

To: Tracy Camuso, G70 (via email)  
Re: Letter Memo – Completion of Installation of Protective Fencing/Preservation Buffer around  
SIHP # 50-80-09-2273, Features 22 & 23 (por.) in Support of Clearway Energy Group  
LLC/Waiawa Solar Project

Aloha Ms. Camuso,

This letter memo with attachments (photographs from the field) serves as notification of completion of the installation of orange construction fencing around the aforementioned site-features. The work was completed according to the specifications described in the Archaeological Preservation Plan by Monahan (2015).

This letter memo with photographs is also being sent to the SHPD, in support of the HRS 6E form that was submitted on 3/12/19 for this project.

Photographs of the installed fencing are included below.

Please let me know if you have any questions about this letter memo.

With aloha,

Christopher M. Monahan, Ph.D.  
Principal Investigator, Archaeologist  
TCP Hawai'i, LLC  
150 Hamakua Dr., #810  
Kailua, HI 96734  
(808) 754-0304  
[mookahan@gmail.com](mailto:mookahan@gmail.com)

c: Arty Joshi, Clearway Energy Group LLC  
Nicola Park, Clearway Energy Group LLC  
Susan Lebo, SHPD-Archaeology Branch  
Kalani Fronda, Kamehameha Schools



**Figure 1. Fencing in foreground is a visual warning of the preservation buffer fencing that starts in the background, indicated by arrows; facing north-northwest**



**Figure 2. Section of fencing along west side of preservation buffer; portion of Feature 22 visible in background (arrow); facing south-southeast**





**Figure 3. Section of fencing along west side of preservation buffer; facing north**



**Figure 4. Northeast corner of fencing of preservation buffer; facing south**



**Figure 5. Section of fencing along north end of preservation buffer; portion of Feature 23 visible in lower left (arrow); facing south**



**Figure 6. Section of fencing along east side of preservation buffer; facing north**