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STATE PARKS

February 19, 2015

Mr. Jeff Overton, Principal  
Group 70 International, Inc.  
925 Bethel Street  
Honolulu, Hawaii 96813

LOG NO: 2014.03535,  
2014.04974  
DOC NO: 1502SL23  
Archaeology

Dear Mr. Overton:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Archaeological Inventory Survey for the Ho‘ohana Solar Farm Project in Kunia  
Waikele Ahupua‘a, ‘Ewa District, Island of O‘ahu  
TMK: (1) 9-4-002:052**

Thank you for the opportunity to review the revised draft report titled *An Archaeological Inventory Survey Report of the Ho‘ohana Solar Farm Project in Kunia, Waikele Ahupua‘a, ‘Ewa District, Island of O‘ahu, Hawaii TMK: (1) 9-4-002:052* (Wong and Spear, February 2015). We received the original submittal on August 4, 2014 (Log No. 2014.03535), a revised submittal on November 5, 2014 (Log No. 2014.04974), and final revisions on February 18, 2015.

The archaeological inventory survey (AIS) was conducted at the request of Group 70 International, Inc. in advance of a proposed solar farm on private property owned by Robinson Kunia Land LLC. The project area totals 161.023 acres. The project area was previously subjected to a reconnaissance survey which yielded no evidence of surface historic properties (Kennedy 1988). The AIS involved a 100% coverage pedestrian survey of the property and excavation of six shovel test pits in proximity to the surface location of several traditional Hawaiian artifacts (a basalt adze preform and two basalt flakes with polished facets). The AIS newly identified a Historic plantation road complex (Site 50-80-08-7671) consisting of three features—an alignment (Feature 1), a wall (Feature 2), and paved segments of a road and railroad alignment (Feature 3). The survey found none of the historic structures, ditches, and reservoirs shown within the project area on a 1927 USGS Waipahu Quadrangle Map. The survey confirmed that much of the project area has been mechanically impacted and subjected to modern modifications due to agricultural activity as indicated by push piles and/or berms, and displaced remnants of former mortared ditch sections, and scattered agricultural and irrigation debris, mortared basalt gravel and cut basalt blocks, railroad spikes, and so forth.

Site 50-80-08-7671 was assessed as significant under Hawaii Administrative Rules (HAR) §13-275-6, Criterion “d” for having yielded information about prior Historic land use, particularly in association with former plantation agriculture in the area. No further work is recommended for the project area due to prior extensive disturbance related to former cultivation, the absence of traditional Hawaiian archaeological sites or features on the surface, sufficient documentation of the surface remnant plantation features, and because little potential exists to encounter intact subsurface cultural deposits. We concur with the site significance assessment for Site 50-80-08-7671 and the recommendation of no further archaeological work.

The revisions adequately address the concerns and issues raised in our consultations regarding the earlier drafts. The archaeological inventory survey report provides adequate discussion of the project area, natural and built environs, cultural and historical background, previous investigations, and the field and laboratory methods and findings. The

**PETITIONER'S EXHIBIT 8**

Mr. Overton  
February 19, 2015  
Page 2

AIS report meets the standards set forth in 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.

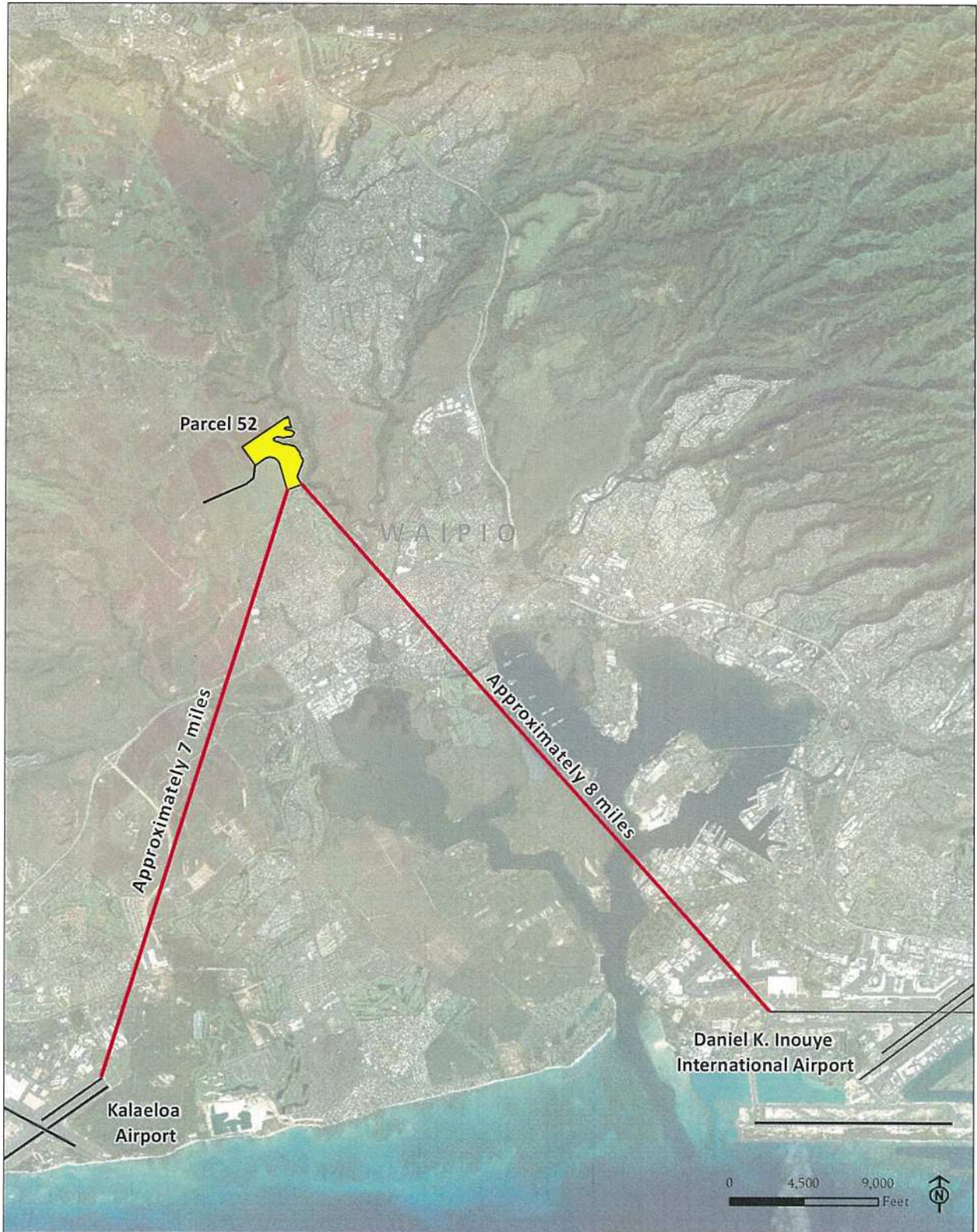
Please contact me at (808) 692-8019 or at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) if you have any questions or concerns regarding this letter.

Aloha



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

cc: Alex Hazlett, PhD, Scientific Consultant Services, Inc. ([alex@scshawaii.com](mailto:alex@scshawaii.com))  
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PETITIONER'S EXHIBIT 9