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December 29, 2020

VIA E-MAIL, HAND-DELIVERY AND U.S. MAIL

Planning Commission
c/o Department of Planning and Permitting
650 South King Street, 7th Floor
Honolulu, HI 96813

Attention: Ms. Gloria Takahara

Re: Applicant: AES West O'ahu Solar, LLC; FILE NO. 2020/SUP-6

Dear Ms. Gloria Takahara:

Please find enclosed twelve (12) sets of additional exhibits for the upcoming January 6, 2021 hearing for the above stated matter. The exhibits are of the following:

- | <u>Exhibit No.</u> | <u>Description</u> |
|--------------------|---|
| 22. | SHPD Comments to Archaeological Inventory Survey Report for AES West Oahu Solar Project. |
| 23. | Letter dated December 28, 2020 from David W. Shideler, Cultural Surveys Hawai'i, Inc. to Dr. Alan S. Downer, SHPD Administrator DLNR—State Historic Preservation Division re: Draft Archaeological Inventory Survey Report for AES West O'ahu Solar Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu, TMK: (1) 9-2-002:007 por. (Welser et al. 2020) submitted for review. |
| 24. | Revised Draft Archaeological Inventory Survey Report for the AES West O'ahu Solar Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu TMK: [1] 9-2-002:007 (por.) Prepared for Tetra Tech, Inc. on behalf of AES Distributed Energy. |
| 25. | Letter dated December 28, 2020 from Nick Molinari Project Development Manager / Authorized Representative AES West Oahu Solar, LLC. to Dr. Alan Downer State Historic Preservation Division re: Archaeological Inventory Survey (AIS) Report for the West Oahu Solar Plus Storage Project; Honouliuli Ahupua'a, 'Ewa District, O'ahu, Tax Map Key (TMK) 9-2-002:007 (por.); LOG No. 2020.00290. |

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Attachment

Archaeological Inventory Survey Report for AES West O'ahu Solar Project, Honolulu Ahupua'a, 'Ewa District, O'ahu, TMK: (1) 9-2-002:007 por. (Wesler et al. 2020)

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1. Revise throughout to indicate aspects of integrity for each site, recognizing that some portions may have low integrity while others have high integrity, and collectively they contribute to the significance of the Waiahole Ditch system. Also, indicate significance criteria including which features have yielded information and which retain potential to yield. Site 5593 was previously assessed as significant under a and d. Current AIS says d only. SHPD believes still significant under a as part of the overall ditch system related to plantation agricultural history, including its association with Waiahole Ditch. Also, potentially eligible under c due to example of water diversion features which may have been unique among systems on Oahu (don't know if case) but is only known example still extant. Management Summary treats it separate from Waiahole Ditch but text elsewhere indicates it connects to and is part of the Waiahole Ditch system.
2. Revise throughout to indicate that both sites and features will be avoided and that SHPD shall be consulted should it not be possible to avoid one or more of them.
3. Revise throughout to indicate a project effect determination of "Effect, with agreed upon mitigation commitments." This is a private project. Indicate the agreed upon mitigation commitments are (1) avoidance of sites and features, (2) Historic American Engineering Record (HAER) documentation of Site ____, Features ____, and (3) Addendum to the Waihole Ditch Historic Context Study (citation) to include the sites and features in the current project area. If possible, we'd like the mill and pump shed added (recognize it is outside project area but is within UH property) as they are part of the ditch system complex.
4. Starting with Management Summary, please reassess significance of Site 2268. SHPD disagrees it is not significant as it has yielded information (criterion d). It is possible to then indicate it has been adequately documented or indicate it has potential to yield additional info that will be included in the addendum to the historic context study.
5. Figure 4. Please provide a revised scan as current is fuzzy with some letters missing/incomplete.
6. Figure 4. Please add this figure to summary/historic property description section w/overlay of the sites/features to illustrate proposed avoidance of the sites/features and interim protection buffers.
7. Page 6, 1.1., para 1. Indicate "...addressed within a report titled..."
8. Page 15. Pu'u 'o Kapolei has been nominated as a TCP (see Tanya Gumapac-McGuire for nomination information or Chris Monahan).
9. Page 19, Figure 10. If possible, provide a sharper scan of the map and label the trails. Caption indicates reader should view trail network.
10. Page 20, 3.1.3., para 1, last sentence. Possibly reword to ensure it doesn't convey that the project area comprises 43,230 acres, but rather her land comprised 43,250 acres and included all of the present project area.
11. Page 21, para 3. Is it the OR&L Ranch Department or the Ranch Department of the OR&L?
12. Page 22, para 1, last sentence. Reword. It says "the remnant portion" but probably should be "a remnant portion" unless it is the only remnant in the 'Ewa Plain. If it is the only known remnant than this should be indicated.

EXHIBIT "22"

CULTURAL SURVEYS HAWAII

ARCHAEOLOGICAL, CULTURAL, AND HISTORICAL DOCUMENTATION SERVICES — SINCE 1982

December 28, 2020

Dr. Alan S. Downer, SHPD Administrator
DLNR—State Historic Preservation Division
Kākuhihewa Bldg., Suite 555
601 Kamōkila Boulevard
Kapolei, Hawai'i 96707
Phone: (808) 692-8015
Fax: (808) 692-8020
Alan.S.Downer@hawaii.gov

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20 DEC 29 P 1:19
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CITY & COUNTY OF HONOLULU

CSH Job Code: HONOULIULI 171

Subject: Draft *Archaeological Inventory Survey Report for AES West O'ahu Solar Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu, TMK: (1) 9-2-002:007 por.* (Welser et al. 2020) submitted for review

Dear Dr. Alan Downer:

Thank you for the comments on our report. On behalf of AES Distributed Energy, Cultural Surveys Hawai'i (CSH) is submitting the attached revised draft *Archaeological Inventory Survey Report for the AES West O'ahu Solar Project, Honouliuli Ahupua'a, 'Ewa District, O'ahu, TMK: [1] 9-2-002:007 (por.)* (Welser et al. 2020) for your review.

This revised version of the report reflects the changes requested in your email correspondence from Dr. Susan Lebo of 20 December 2020 to address a previous draft of the report submitted on 6 February 2020 (LOG NO: 2020.00290). The revisions addressed are detailed in the attached table.

If you have any questions or comments, please feel free to call me at (808) 262-9972 or toll free at 1-800-599-9962. You may also reach me by e-mail at dshideler@culturalsurveys.com.

Thank you,



David W. Shideler

Cultural Surveys Hawai'i, Inc.



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Kaua'i Island
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Līhu'e, HI 96766
Ph. (808) 245-9374

EXHIBIT "23"

**Revised Draft
Archaeological Inventory Survey Report for the
AES West O'ahu Solar Project,
Honouliuli Ahupua'a, 'Ewa District, O'ahu
TMK: [1] 9-2-002:007 (por.)**

**Prepared for
Tetra Tech, Inc.
on behalf of
AES Distributed Energy**

**Prepared by
Alison Welser, M.A.,
Scott Belluomini, B.A.,
Tyler Turran, B.A.,
David W. Shideler, M.A.,
and
Hallett H. Hammatt, Ph.D.**

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**Cultural Surveys Hawai'i, Inc.
Kailua, Hawai'i
(Job Code: HONOULIULI 171)**

December 2020

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EXHIBIT "24"



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CITY & COUNTY OF HONOLULU

December 28, 2020

Dr. Alan Downer
State Historic Preservation Division
Kakuhihewa Building, Suite #555
601 Kamokila Blvd.
Kapolei, HI 96707

RE: Archaeological Inventory Survey (AIS) Report for the West Oahu Solar Plus Storage Project; Honouliuli Ahupua'a, 'Ewa District, O'ahu, Tax Map Key (TMK) 9-2-002:007 (por.); LOG No. 2020.00290

Dear Dr. Downer,

We are writing to follow up on a meeting held on December 18, 2020 with State Historic Preservation Division (SHPD) staff and subsequent comments provided by Dr. Susan Lebo (email dated December 20, 2020) regarding the archaeological inventory survey (AIS) and effect determination for the AES West O'ahu Solar Plus Storage Project. The proposed project includes construction and operation of a 12.5 megawatt (MW) solar photovoltaic and 50 MW-hour energy storage system on land owned by the University of Hawaii (UH) in the 'Ewa District of O'ahu. Pursuant to Hawai'i Revised Statutes (HRS) § 6E and Hawai'i Administrative Rules (HAR) § 13-284, and in coordination with the City and County of Honolulu Department of Planning and Permitting (DPP), the Draft AIS Report and effect determination for the project was submitted to SHPD on February 5, 2020. SHPD received the submittal and assigned LOG No. 2020.00290 on February 6, 2020.

Based on the meeting with SHPD staff and subsequent comments provided by Dr. Susan Lebo, the Draft AIS Report has been revised and submitted to SHPD. All of the changes identified by SHPD have been addressed in the report, as detailed in the submittal package. In particular, the report has been revised to reflect an effect determination for the project of "effect, with agreed upon mitigation commitments," with mitigation as listed below.

- Avoidance of adverse impact to the designated features of State Inventory of Historic Properties (SIHP) # 50-80-09-2268 and SIHP # 50-80-08-5593 Feature 2 (2A through 2E)

AES Distributed Energy
282 Century Place, Suite 2000
Louisville, CO 80027
aesdistributedenergy.com

EXHIBIT "25"



UNIVERSITY of HAWAII SYSTEM

Jan S. Gouveia Vice President for Administration

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December 28, 2020

Dr. Alan Downer State Historic Preservation Division Kakuhihewa Building, Suite #555 601 Kamokila Blvd. Kapolei, HI 96707

RE: Archaeological Inventory Survey (AIS) Report for the West Oahu Solar Plus Storage Project; Honouliuli Ahupua'a, 'Ewa District, O'ahu, Tax Map Key (TMK) 9-2-002:007 (por.); LOG No. 2020.00290

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- Avoidance of adverse impact to the designated features of State Inventory of Historic Properties (SIHP) # 50-80-09-2268 and SIHP # 50-80-08-5593 Feature 2 (2A through 2E) within the project area. SHPD will be consulted should it not be possible to avoid impact to one or more of these features.
Historic American Engineering Record (HAER) documentation of SIHP # 50-80-08-5593 Feature 2.
Incorporation of the portion of SIHP # 50-80-09-2268 within the project area into an existing Addendum to the Waiahole Ditch Historic Context Study (Mason Architects, Inc. 2018).
Data Recovery in the form of archaeological monitoring in the immediate vicinity of "Pump Camp 5." A monitoring plan in accordance with HAR § 13-279-4 will be prepared for review and accepted by SHPD.

2444 Dole Street, Bachman Hall 109H Honolulu, Hawaii'i 96822 Telephone: (808) 956-6405 • Fax: (808) 956-9701 An Equal Opportunity/Affirmative Action Institution

**Revised Draft
Archaeological Inventory Survey Report for the
AES West O'ahu Solar Project,
Honouliuli Ahupua'a, 'Ewa District, O'ahu
TMK: [1] 9-2-002:007 (por.)**

**Prepared for
Tetra Tech, Inc.
on behalf of
AES Distributed Energy**

**Prepared by
Alison Welsler, M.A.,
Scott Belluomini, B.A.,
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Hallett H. Hammatt, Ph.D.**

**Cultural Surveys Hawai'i, Inc.
Kailua, Hawai'i
(Job Code: HONOULIULI 171)**

December 2020

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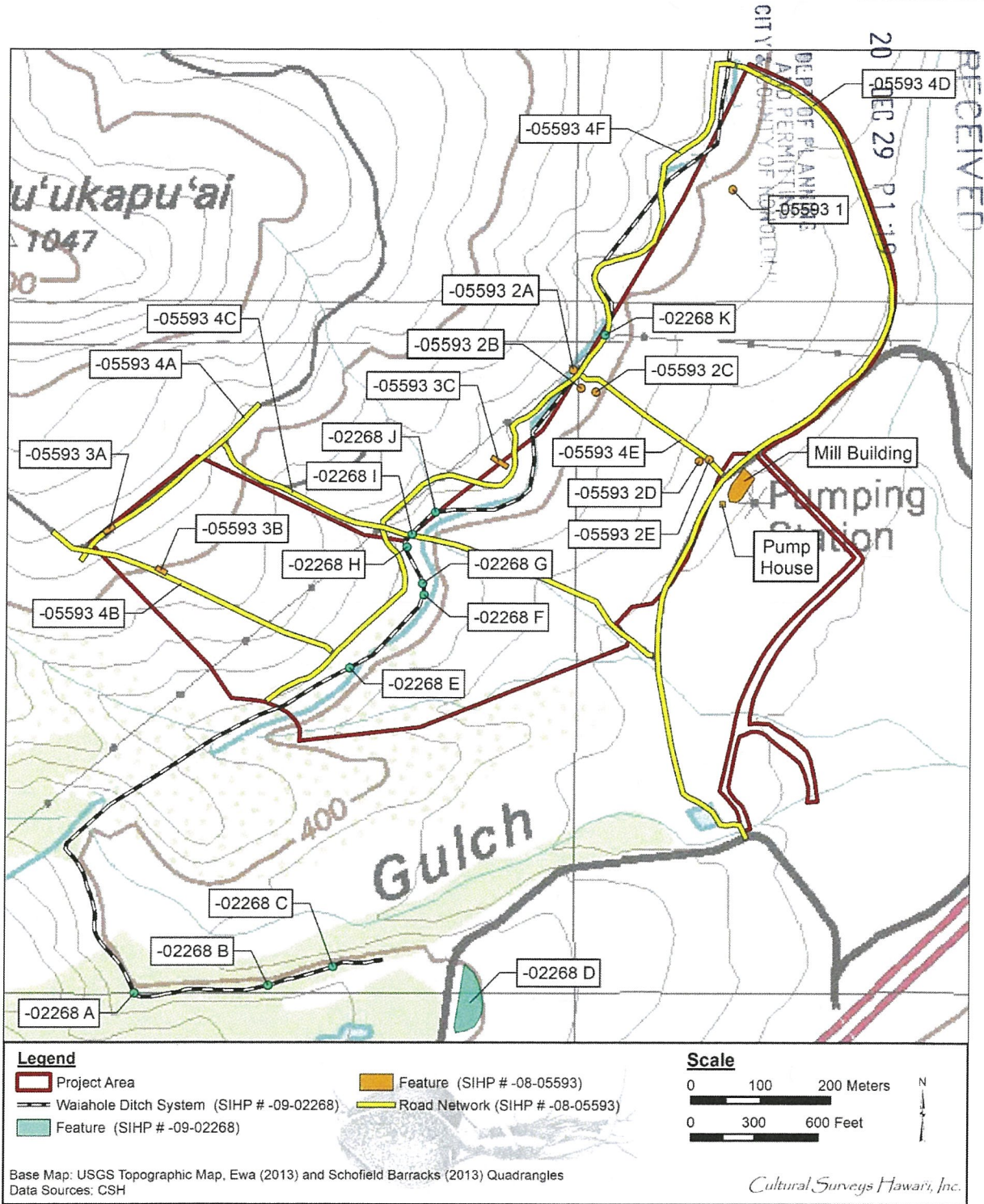


Figure 39. 2013 Ewa and Schofield Barracks USGS topographic quadrangles showing the historic properties identified during the AIS: SIHP # 50-80-08-2268 Feature E through Feature K (shown in green) and SIHP # 50-80-08-5593 Feature 1, Features 2A through 2E, and Features 3A through 3C (shown in orange) and SIHP # 50-80-08-5593 Features 4A through 4F shown in yellow; Features A through D of SIHP # -2268 identified in previous studies nearby the project area were included for reference

Appendix A SHPD Acceptance of the Dega et al. 1998 AIS

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BENJAMIN J. CAYETANO
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BOARD OF LAND AND NATURAL RESOURCES

DEPUTIES
GILBERT COLOMA-AGARAN
TIMOTHY E. JOHNS

STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

HISTORIC PRESERVATION DIVISION
Kakuhinewa Building, Room 555
801 Kamehaha Boulevard
Kapolei, Hawaii 98707

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
CONSERVATION AND RESOURCES
ENFORCEMENT
CONVEYANCES
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
LAND
STATE PARKS
WATER RESOURCE MANAGEMENT

February 3, 1999

Mr. Michael Dega, MA
Scientific Consultant Services, Inc.
711 Kapiolani Boulevard, Suite 777
Honolulu, Hawaii 96813

LOG NO: 22959 ✓
DOC NO: 9901EJ28

Dear Mr. Dega:

**SUBJECT: Historic Preservation Review of An Archaeological Inventory Survey of the University of Hawai'i, West O'ahu Campus, District of 'Ewa, Island of O'ahu, Hawai'i (1998 Dega et al.)
Honouliuli, 'Ewa, O'ahu
TMK: 9-2-002:001 por.; 9-2-004:005 por.**

Thank you for the submittal of the replacement pages for the above report which completes the historic preservation review for this project. We can now conclude that the inventory survey was successfully executed. The report has been added to our library for public use.

Should you have any questions, please feel free to call Sara Collins at 692-8026 or Elaine Jourdane at 692-8027.

Aloha,

Don Hibbard, Administrator
Historic Preservation Division

EJ:jk

FEB 9 1999

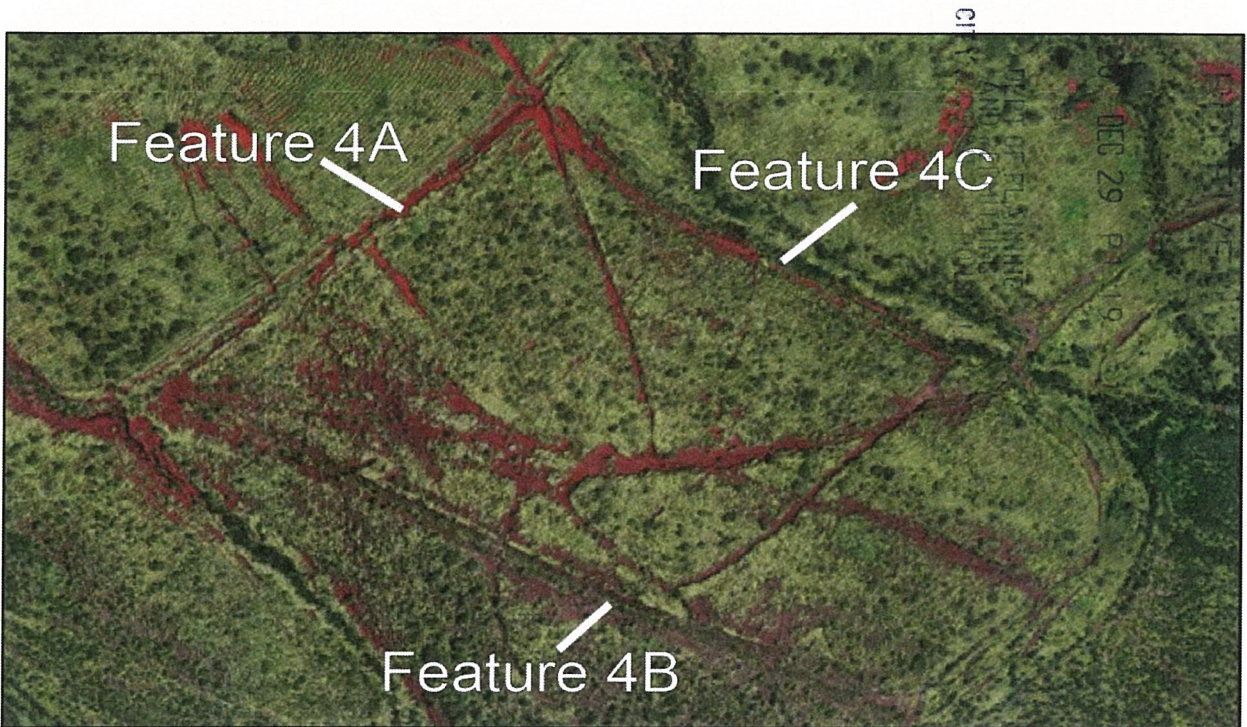


Figure 85. Aerial view of SIHP # 50-80-08-5593 Features 4A (top left), 4B (lower left), and 4C (upper center) (Google Earth 2020)



Figure 86. Overview of southern portion of SIHP # 50-80-08-5593 Feature 4D, view to northeast (Photo P; Figure 27)