January 6, 2021

VIA E-MAIL AND HAND-DELIVERY

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

Attention: Ms. Gloria Takara

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

Dear Ms. Gloria Takara:

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

Exhibit No. Description


Thank you for your attention to this matter.

Very Truly Yours,

MATSUBARA, KOTAKE & TABATA

[Signature]

For Curtis T. Tabata

Enclosures

cc: AES West O‘ahu Solar, LLC
January 4, 2021

Ms. Kathy Sokugawa, Acting Director
Department of Planning and Permitting
City and County of Honolulu
One Main Plaza Building
650 South King Street
Honolulu, Hawaii 96813
c/o Franz Kraintz, fkraintz@hnlno.gov

Dear Ms. Sokugawa:

SUBJECT: HRS Chapter 6E-42 Historic Preservation Review
Special Use Permit (SUP) Application File No. 2020/SUP-6
Archaeological Inventory Survey Report for the AES West O‘ahu Solar Project
Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu
TMK: (1) 9-2-002:007 por.

This letter provides the State Historic Preservation Division’s (SHPD’s) review of the draft document titled Archaeological Inventory Survey 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., December 2020). SHPD received the original submittal on February 6, 2020. SHPD requested additional information and revision to the draft archaeological inventory survey (AIS) on December 20, 2020 and received the revised report on December 28, 2020 (Email correspondence between Susan A. Lebo [SHPD] and David Shideler [Cultural Surveys Hawai‘i, Inc.]).

This archaeological inventory survey (AIS) of the undeveloped 101.62 acres was completed by Cultural Surveys Hawai‘i, Inc. (CSH) at the request of AES Distributed Energy (private project proponent) and University of Hawai‘i (landowner). The proposed project consists of construction and operation of an approximately 12.5 MW ground-mounted solar photovoltaic system, coupled with a 50 MWh battery energy storage system and related interconnection and ancillary facilities. Scientific Consultant Services, Inc. (SCS) conducted an AIS of the project area in 1998. SHPD accepted the AIS report titled, Archaeological Inventory Survey of the University of Hawai‘i West O‘ahu Campus, District of ‘Ewa, Island of O‘ahu, Hawai‘i (TMKs: 9-2- 02:01, 03, and 05) (Dega et al. 1998).

SHPD requested an AIS be conducted for the current project due to the passage of time since the 1998 survey and the current scope of work (February 12, 2019 meeting with Susan Lebo [SHPD] and David Shideler [CSH]). CSH conducted the AIS fieldwork between February 4 and February 6, 2019. The project included a 100% surface survey and site documentation with GPS, site mapping, and photography. The pedestrian survey was accomplished through systematic sweeps of four CSH archaeologists spaced approximately 10 to 15 m apart based ground visibility. The AIS further documented two sites (Sites 50-80-08-5593 and Site 50-80-09-2268) (Table 1).

The two identified sites (SIHP Sites 50-80-08-3395 and 50-80-09-2268) exhibit varying degrees of integrity and are both assessed as significant in accordance with HAR §13-284-6 under Criterion “a” and “d”. Site 50-80-09-2268 is also assessed as significant under Criterion “c”. Site 5-5593 is significant under Criteria “a” as part of the overall ditch system related to plantation agricultural history and Criteria “d” for the information it has yielded and may be likely to yield pertaining to plantation agricultural history.

EXHIBIT "27"
Table 1. Archaeological sites documented during the current AIS.

<table>
<thead>
<tr>
<th>SIHP Site #</th>
<th>Site Description</th>
<th>Temporal Association</th>
<th>Significance</th>
<th>Mitigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>50-80-08-5593</td>
<td>Historic irrigation system and plantation infrastructure</td>
<td>Historic</td>
<td>a and d</td>
<td>Avoidance of Features 2A through 2E, no further work for Features 1, 3, and 5. HAER documentation</td>
</tr>
<tr>
<td>50-80-09-2268</td>
<td>Waiahole Ditch System</td>
<td>Historic</td>
<td>a, c, and d</td>
<td>Avoidance of designated features and incorporation within a historic context study</td>
</tr>
</tbody>
</table>

The AIS results supports a project effect determination of “Effect, with agreed upon mitigation commitments.” In consultation with SHPD, the report recommends mitigation consisting of the following:

1. Avoidance of adverse impacts to SIHP Site 50-80-08-5593 Feature 2 (2A through 2E) within the project area;
2. Historic American Engineering Record (HAER) documentation of SIHP Site 50-80-08-5593 Feature 2;
3. Incorporation of the portion of SIHP Site 20-80-09-2268 within and immediately adjacent to the project area into an Addendum to the existing Ditch Historic Context Study (Mason Architects, Inc. 2018); and
4. Data Recovery in the form of archaeological monitoring in the immediate vicinity of “Pump Camp 5.”

**SHPD agrees** with the with a project effect determination of “Effect, with agreed upon mitigation commitments” and the four mitigation commitments listed above.

The revised AIS adequately addresses the issues and concerns raised in our previous correspondence. This AIS report satisfies the requirements of HAR §13-276-5. **It is accepted.** Please send one hard copy of the document, clearly marked FINAL, along with a text-searchable PDF version of the AIS, to the Kapolei SHPD office, attention SHPD Library. Please send a text-searchable PDF copy of the AIS (Welser et al., December 2020) to SHPD via HICRIS to Project 2020PR32397 using the Supplemental Attachment option and a second PDF copy to Lehua.K.Soares@hawaii.gov.

Pursuant to HAR §13-284-3, Steps (1) through (4) of the historic preservation review process are complete. As stipulated in HAR §13-284-7, when SHPD comments that a project will result in “Effect, with agreed upon mitigation commitments,” then detailed mitigation plans shall be developed for SHPD review and acceptance prior to project work commencing.

**SHPD hereby notifies DPP that the permit issuance process may proceed.**

**Prior to project initiation, SHPD looks forward** to receiving for review and acceptance of an archaeological monitoring plan meeting the requirements of HAR §13-279-4 and receiving written and photographic verification of installation of interim protection measures to ensure avoidance of impact on specific agreed-upon sites and/or features.

**Within 60 days of completion of archaeological monitoring, SHPD looks forward** to receiving for review and acceptance:

1. HAER documentation of SIHP Site 50-80-0805593 Feature 2;
2. Addendum to the existing Ditch Historic Context Study (Mason Architects, Inc. 2018); and
3. An archaeological monitoring report meeting the requirements of HAR §13-279-5.

Please contact Tanya Gumapac-McGuire, Architecture Branch Chief, at Tanya.Gumapac-Mcguire@hawaii.gov or at (808) 692-8022 regarding architectural resources, and Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov or Samantha Hemenway, O’ahu Island Archaeologist, at (808) 692-8011 or at Samantha.Hemenway@hawaii.gov for questions regarding archaeological resources or this letter.
Aloha,

Alan Downer

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

cc:    David Shideler, DShideler@culturalsurveys.com
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