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January 6, 2021

DEPT OF PLANNING  
AND PERMITTING  
CITY & COUNTY OF HONOLULU

## 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:

<u>Exhibit No.</u>	<u>Description</u>
27	Letter dated January 4, 2021 from Alan S. Downer, PhD, Administrator, State Historic Preservation Division, Deputy State Historic Preservation Officer, State Of Hawaii, Department Of Land And Natural Resources, State Historic Preservation Division to Ms. Kathy Sokugawa, Acting Director, Department of Planning and Permitting, City and County of Honolulu re: 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.

Thank you for your attention to this matter.

Very Truly Yours,

MATSUBARA, KOTAKE & TABATA



for Curtis T. Tabata

Enclosures

cc: AES West O'ahu Solar, LLC

DAVID Y. IGE  
GOVERNOR OF  
HAWAII



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KAHOOLAWE ISLAND RESERVE COMMISSION  
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STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION  
KAKUHIHEWA BUILDING  
601 KAMOKILA BLVD., STE 555  
KAPOLEI, HI 96707

DEPT OF PLANNING  
AND PERMITTING  
CITY & COUNTY OF HONOLULU

January 4, 2021

IN REPLY REFER TO:  
Project No.: 2020PR32397  
Log No.: 2020.00290  
Doc. No.: 2101SCH01  
Archaeology, Architecture

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@honolulu.gov](mailto:fkraintz@honolulu.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 -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.

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

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](mailto: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](mailto: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](mailto:Susan.A.Lebo@hawaii.gov) or Samantha Hemenway, O’ahu Island Archaeologist, at (808) 692-8011 or at [Samantha.Hemenway@hawaii.gov](mailto:Samantha.Hemenway@hawaii.gov) for questions regarding archaeological resources or this letter.



Ms. Sokugawa  
January 4, 2021  
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Aloha,

*Alan Downer*

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

cc: David Shideler, [DShideler@culturalsurveys.com](mailto:DShideler@culturalsurveys.com)  
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