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September 8, 2021

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IN REPLY REFER TO:  
Project No. 2021PR00380  
Submission Nos. 2021PR00380.001  
and 2021PR00380.002  
Doc. No. 2109SL01  
Archaeology

Dear Mr. Krantz:

**SUBJECT: Chapter 6E-42 Historic Preservation Review  
Mahi Solar Project  
Special Use Permit  
Request for HRS 6E Project Effect Determination  
Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu  
TMK: (1) 9-2-001:020 por., (1) 9-2-004:003 por., 006 por., 010 por., and 012 por.**



This letter provides the State Historic Preservation Division's (SHPD's) review of the Mahi Solar Project, including a Special Use Permit (SUP) permit application and a supporting archaeological inventory survey (AIS) report titled, *An Archaeological Inventory Survey of the Mahi Solar Project Area, TMK: (1) 9-2-001:020 (por.), and TMKs: (1) 9-2-004:003 (por.), 006 (por.), 010 (por.), 012 (por.), Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu* (Rechtman, September 2021). Longroad Energy Management, LLC (Longroad) is the parent company of Mahi Solar, LLC which is the project applicant. SHPD received photos of the project area on July 20, 2020, and a project submittal via HICRIS on April 6, 2021 for SHPD review (Submission No. 2021PR00380.001), which included the Mahi Project SUP application, an archaeological reconnaissance report (Rechtman, December 2020), a SHPD HRS 6E Submittal Form, the draft AIS report (Rechtman, April 2021), TMK and project vicinity maps, project construction plans, and a letter dated April 6, 2021 from G70 (consultant) requesting a HRS 6E-42 project effect determination for the Mahi Solar Project. On September 7, 2021 SHPD requested revisions to the draft AIS (Rechtman, April 2021) and received the revised report (Rechtman, September 2021) on September 8, 2021 (Submission No. 2021PR00380.002).

The Mahi Solar SUP application indicates the proposed project is the construction of a 120-megawatt solar energy generation and storage facility. Mahi Solar, LLC will lease the lands from three landowners, Monsanto Technology [TMK: (1) 9-2-001:020], LLC; Hartung Brothers Hawai'i, LLC [TMK: (1) 9-2-004:006, 011, 012]; and Fat Law's Farm Inc. [TMK: (1) 9-2-004:010]. The facility will include ground-mounted photovoltaic arrays, an electrical substation and switchyard, a Battery Energy Storage System (BESS), and other associated appurtenances including fencing, roads, and electrical infrastructure on agriculture-zoned land. Mahi Solar, LLC will use existing farm roads outside of the lease footprint and establish new roads where necessary within the lease footprint. The project area totals approximately 620 acres and the solar facility will be developed in five areas (Areas 1, 2, 3, 4A, 4B, 4C, and 5), across portions of five privately-owned parcels. The project area is bounded by agricultural land to the north, south, east, and west, and a portion to the west is also bounded by the Honouliuli Forest Reserve and State of Hawai'i-owned vacant preservation land. The National Park Service (NPS) Honouliuli National Historic Site is located adjacent to the southwest.

The SUP application summarizes the archaeological reconnaissance, archaeological inventory survey, and ka pa'akai analysis conducted by ASM Affiliates in support of the Mahi Solar project. ASM Affiliates conducted the archaeological studies at the request of Longroad. Significant traditional historic properties and wahi pana have been identified in the vicinity, including Pohakea Trail, ali'i battle sites, a heiau atop Pu'u Ku'ua, and Honouliuli National Historic Site, among others. None of these significant historic properties were identified as extending into the Mahi Solar project area. However, two plantation-related sites abut or extend into the project area: the Waiāhole Ditch (Site 50-80-09-2268) and remnants of the O'ahu Sugar Company Irrigation Infrastructure (Site 50-80-12-7346). A section of the Waiāhole Ditch meanders along the southern and western boundaries of Area 3 and extends in a southerly direction past Area 5. Construction of the ditch began in 1913 and was completed in 1916. The ditch remains in use today. The O'ahu Sugar Company irrigation infrastructure dates to the twentieth century and includes concrete "Waiālua" flume segments, metal pipes, and mortared basalt wall remnants, primarily in Area 5, and to a lesser degree in the peripheral portion of Area 1. These infrastructure remnants were identified in both undisturbed and disturbed contexts.

The Waiāhole Ditch (Site 50-80-09-2268) is assessed as significant under HAR §13-284-6 Criteria a and c as a major water irrigation network that significantly changed the physical, economic, and socio-political landscape of leeward O'ahu following its completion in 1916. The ditch, which remains in use, is outside the footprint of the Mahi Solar, LLC ground lease areas and will not be affected by the proposed project. Per HAR §13-284-8(a)(1)(A) the recommended mitigation for the Waiāhole Ditch is "avoidance and protection" during development activities.

The O'ahu Sugar Company Irrigation Infrastructure (Site 50-80-12-7346) is assessed as significant under HAR §13-284-6 Criteria a and d as reflecting an extensive network of temporary irrigation flumes established in the early twentieth century to transport water from the Waiāhole Ditch to the company's plantation agricultural fields. The AIS (Rechtman, September 2021) indicates that Site 50-80-12-7346 extends well beyond the boundaries of the current project area, and that remnants of this system were identified immediately outside the project area, and that Monahan and Thurman (2013) documented additional related infrastructure remnants during an AIS completed for the nearby Kunia Loa Ridge Farmlands Project.

The AIS (Rechtman, September 2021) indicates the Waiāhole Ditch (Site 50-80-09-2268) will be avoided during construction, that the surface infrastructure remnants (Site 50-80-12-7346) have been adequately documented within the current project area, and minimal potential exists for unrecorded remnants or subsurface components of Site 50-80-12-7346 to be encountered during project construction. Therefore, the AIS recommends a project effect determination of "Effect, with agreed upon mitigation commitments," with mitigation in the form of archaeological monitoring.

SHPD agrees with the integrity and site significance assessments, and a project effect determination of "Effect, with agreed upon mitigation commitments" per HAR §13-284-7(a)(2) and with mitigation in the form of avoidance for Site 50-80-09-2268 per HAR §13-284-8(a)(1)(A) and archaeological monitoring for all ground disturbing activities per HAR §13-284-8(a)(1)(C), to include recordation and mitigation of any additional structural remnants or features of Site 50-80-12-7346 which may be identified during project construction. An archaeological monitoring plan (AMP) meeting the requirements of HAR §13-279-4 will be submitted for SHPD review and acceptance prior to project initiation. Additionally, as Site 50-80-09-2268 is outside the project's ground lease area, a preservation plan will not be prepared. However, interim protection measures for this site will be stipulated in the archaeological monitoring plan (AMP), and written and photographic verification of their implementation shall be submitted to SHPD prior to project initiation.

The AIS report (Rechtman, September 2021) meets the requirements of HAR 13-276-5. It is accepted. Please submit one hard copy of the AIS, labeled Final, along with a text-searchable pdf copy of the AIS and a copy of this letter to the SHPD Kapolei office, attention Library. Please upload a text-searchable pdf copy of the Final AIS to HICRIS Project No. 2021PR00380 using the Project Supplement option, and a copy to [Lehua.K.Soaes@hawaii.gov](mailto:Lehua.K.Soaes@hawaii.gov).

**SHPD hereby** notifies the DPP that SUP permit issuance process may continue with the understanding that an AMP meeting the requirements of HAR §13-279-4 prior to project initiation shall be submitted for SHPD review and acceptance prior to project initiation.

**Please submit** the AMP and any other project documents and correspondence to [HICRIS Project No. 2021PR00380](#) using the Project Supplement option.

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Please note on relevant construction plans: In the unlikely event that subsurface historic resources, including human skeletal remains, structural remains, cultural deposits, artifacts, sand deposits, or sink holes are identified during the demolition and/or construction work, cease work in the immediate vicinity of the find, protect the find from additional disturbance, and contact the State Historic Preservation Division, at (808) 692-8015.

Please contact Susan A. Lebo, Archaeology Branch Chief, at [Susan.A.Lebo@hawaii.gov](mailto:Susan.A.Lebo@hawaii.gov) for any questions or concerns regarding this letter.

Mahalo,

*Alan Downer*

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

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