

ARCHAEOLOGICAL CONTEXT

In this section, we summarize the results of previous archaeological research in the vicinity of the current project area. To our knowledge, no previous archaeological inventory survey work has been conducted in the current project area. The purpose of this section is to reconstruct human use and modification of the landscape in and near the current project area.

In conjunction with the Cultural and Historical Context presented above, the information in this section forms the basis of our predicted findings that are included in the next section (see Predicted Findings of the AIS).

Table 3 summarizes previous archaeological studies and results near the current project area.

Figure 22 depicts the location of previous archaeological studies near the current project area.

McAllister's (1933) survey was the first scientific attempt to record significant archaeological and other cultural sites such as wahi pana on O'ahu. In keeping with McAllister's propensity to focus on large, formal structures (such as heiau) located in easily-accessible coastal areas, he did not identify any sites in the vicinity of the current project area, which was considered a remote (hinterlands) location both in traditional and early historic times. Sterling and Summers' (1978) compendium of sites on O'ahu does not list, depict or describe any historic properties or wahi pana (legendary places) within a couple miles of the project area in Waikele or Hō'ae'ae. As described in the Cultural and Historical Context section above, two heiau (long ago destroyed) in Waikele Ahupua'a (see Sterling and Summers 1978:25) were Mokoula (or Moko'ula) and Hapupu (Sites 127 and 129, respectively); these were once located near the famous pūnāwai (fresh-water spring) of Waipahu (Site 128), a couple miles makai (south) of the current project area near the present-day H-1 highway.

Previous archaeological studies near the current project area can generally be categorized into two distinct types:

1. Those conducted on plateau lands adjacent to gulches and drainages (but not in them)—these studies almost always occurring in active or once-active, historic-period, commercial sugar cane lands; unless they report no findings, these studies always result in historic-period (primarily plantation era, but also terminal historic period or early modern era) sites only; and,
2. Studies conducted in gulches or drainages (but not on the adjacent plateau). These studies are where some pre-Contact sites have been found; this is a common pattern in central O'ahu where mechanized, commercial agriculture has mostly destroyed everything *except* gulch and drainage sites from pre-Contact times. Immediately east of the current project area in Waikakalaua Gulch, and also Kīpapa Gulch further east, many traditional, Hawaiian rockshelters and caves with cultural deposits have been found.

Previous Archaeological Studies in the Current Project Area

Wong and Spear's (2015) Archaeological Inventory Survey (AIS) of the 161 acres comprising the current project area identified one historic property: State Inventory of Historic Places (SIHP) # 50-80-08-7671 (remnants of a historic-period road complex consisting of three features) (Figure 23 to Figure 26). They also discovered three, traditional Hawaiian lithic artifacts on the ground surface: a basalt adze preform and two basalt flakes with use wear (i.e., polished facets). Six hand-excavated shovel probes were randomly placed in the project area. These small excavations yielded 43 historic-period and modern artifacts, but no traditional or pre-Contact Hawaiian artifacts. The historic artifacts with diagnostic evidence of a specific time period of manufacture included a 1908 copper Indian-head penny and a glass bottle sherd manufactured using a technique common from 1880s to 1920s (Figure 27).

Table 3. Previous Archaeological Studies and Results near the Project Area

Reference ¹	Type	Location	Results & Comments ²
Barrera 1985a*	Reconnaissance survey of 692 acres	Waikele plateau lands, including Village Park, Waipahu, and Royal Kunia residential area and golf course bordering current project area on its south side	No findings; land was under sugar cane agriculture at time of survey
Barrera 1985b	Reconnaissance survey of 586 acres	Plateau lands east of Waikele Gulch	No findings
Riford & Cleghorn 1986*	Survey of 264 acres	Waikakalaua Gulch (Waikele Stream) in Waikele and bordering current project area to its east, and Kīpapa Gulch in Waipi'o	5 sites identified in Waikakalaua Gulch: SIHP # 50-80-08-2919 (pre-Contact rockshelter w cultural materials inside), SIHP # 2920 (3 caves interpreted as pre-Contact temporary habitation), SIHP # 2921 (cave & crawl space w cultural material on surface), SIHP # 2922 (probable historic basalt rock quarry), SIHP # 2923 (historic-period rock wall along top of gulch edge)
Kennedy 1987*	Reconnaissance survey of 203 acres	Plateau lands of Hō'ae'ae	Identified portion of Waiāhole Ditch (SIHP # 50-80-08-2268) and 2 reservoirs dated to plantation-era; no new SIHP #s were assigned to the reservoirs; land was previously used for sugar cane agriculture
Hammatt et al. 1988*	Survey of 422 acres	Waikakalaua Gulch (Waikele Stream), starting immediately northeast of current project area, and continuing to the north	2 small terraces interpreted as historic-period (sugar cane agriculture) structures, and 1 railroad berm; no SIHP #s were assigned these sites, which were determined to be not historically significant
Kennedy 1988*	Reconnaissance survey of 670 acres	Plateau lands of Hō'ae'ae & Waikele; subsumes and includes the entire current project area	No findings; land was under sugar cane agriculture at time of survey
Mills 1993*	Survey of transmission line realignments (several acres in size)	Plateau lands on edge of drop-off into gulch (Waikele)	No findings
Tomonari-Tuggle & Welch 1994*	Survey of corridor east side of Kīpapa Gulch	Kīpapa Gulch (Waikele & Waipi'o)	2 sites identified: SIHP # 50-80-08-4935 (pre-Contact rockshelter & cave w traditional Hawaiian artifacts), and SIHP # 4936 (20 th century railroad bed)
Tomonari-Tuggle & Erkelens 1995*	Survey of corridor east side of Kīpapa Gulch	Kīpapa Gulch (Waikele & Waipi'o)	2 sites identified: SIHP # 50-80-08-4937 (pre-Contact rockshelter & cave w cultural materials), and SIHP # 4938 (50 m long terrace on north bank of the gulch)

Reference ¹	Type	Location	Results & Comments ²
Titchenal et al. 2013*	Inventory survey of 37 acres	Plateau lands of Hō'ae'ae	No findings (reported as Archaeological Assessment in accordance with historic preservation administrative rules)
Walden et al. 2013*	Inventory survey of 152 acres	Plateau lands of Hō'ae'ae & Waikele (Royal Kunia subdivision area), just south-southwest of current project area	No findings (reported as Archaeological Assessment in accordance with historic preservation administrative rules)
Shideler et al. 2014*	Inventory survey of 2 reservoirs adjacent to the Waiāhole Ditch (2 areas total 64 acres)	Plateau lands of Hō'ae'ae and Waikele	Reservoir 225 was documented in detail, including identification of a number of features
Wong & Spear 2015*	Inventory survey of 161 acres	Same as the current CIA project area	1 site recorded: SIHP # 50-80-08-7671 (a historic-period road); also, a basalt adze preform and 2 basalt flakes were found on the ground surface
Monahan and LaChance 2020*	Inventory survey of 160 acres	Plateau lands of Hō'ae'ae & Waikele (TMK [1] 9-4-003:001, pr.) just north of current project area	3 significant historic properties, functionally related to commercial (sugar cane plantation) activities and dating from the late historic period, were identified: SIHP # 50-80-08-8850, -8851 & -8852, consisting of 2 historic-period dirt roads and 1 stack/pile of basalt boulders used as a shaping area to create dressed basalt blocks (see text discussion above); 1 historic property (a heavily damaged/functionally destroyed sluice gate) was evaluated as <i>not</i> a significant historic property (and, thus, not assigned a SIHP #)

¹ Studies marked by an asterisk (*) are depicted on the map below. Shideler et al. (2014) included one reservoir about ¾-mile west of the current project area—depicted on the map below, and one west of Kunia Road on Monsanto land (not depicted in the map below).

² It is important to understand that, for the most part, studies conducted before the last 10-15 years or so were typically not actively looking to identify or documentation plantation-era site-features and other historic-period site-features (such as irrigation ditches, etc.); thus, earlier reports that describe “no findings” would likely have at least some findings (i.e., historic properties, or anything older than 50 years) had they been conducted more recently.

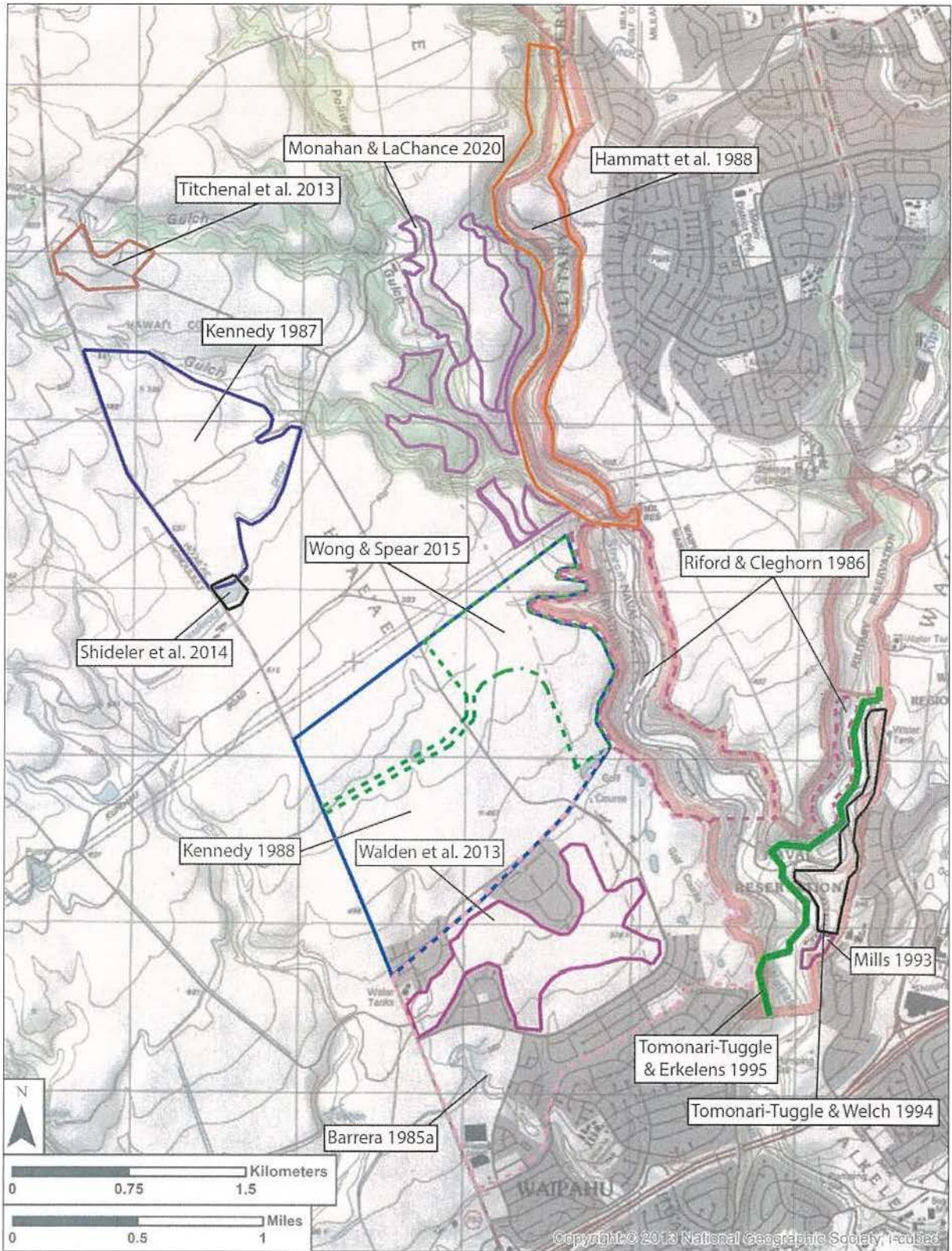


Figure 22. Previous archaeological studies in and near the project area; see text and table above for details

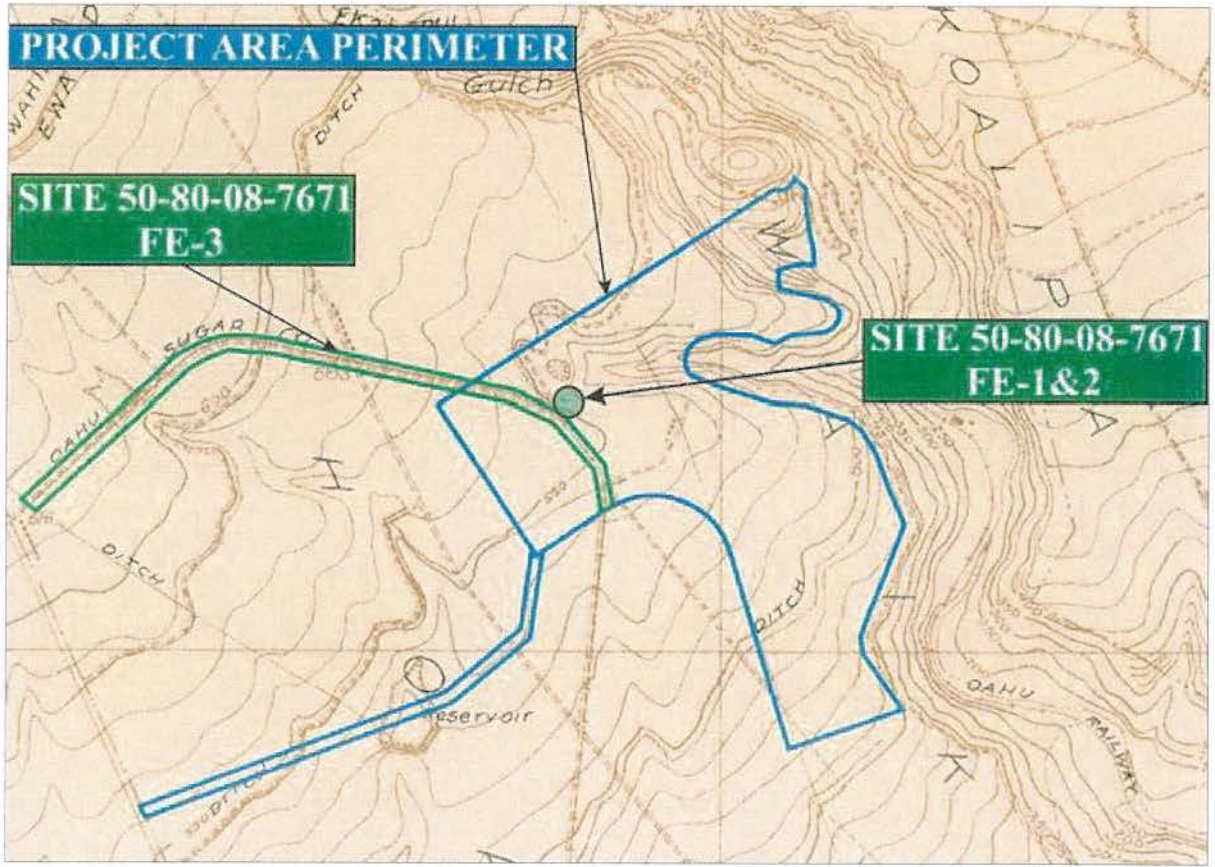


Figure 23. Wong and Spear's (2015:21) map of SIHP # 50-80-08-7671 (projected on 1927 topographic map)

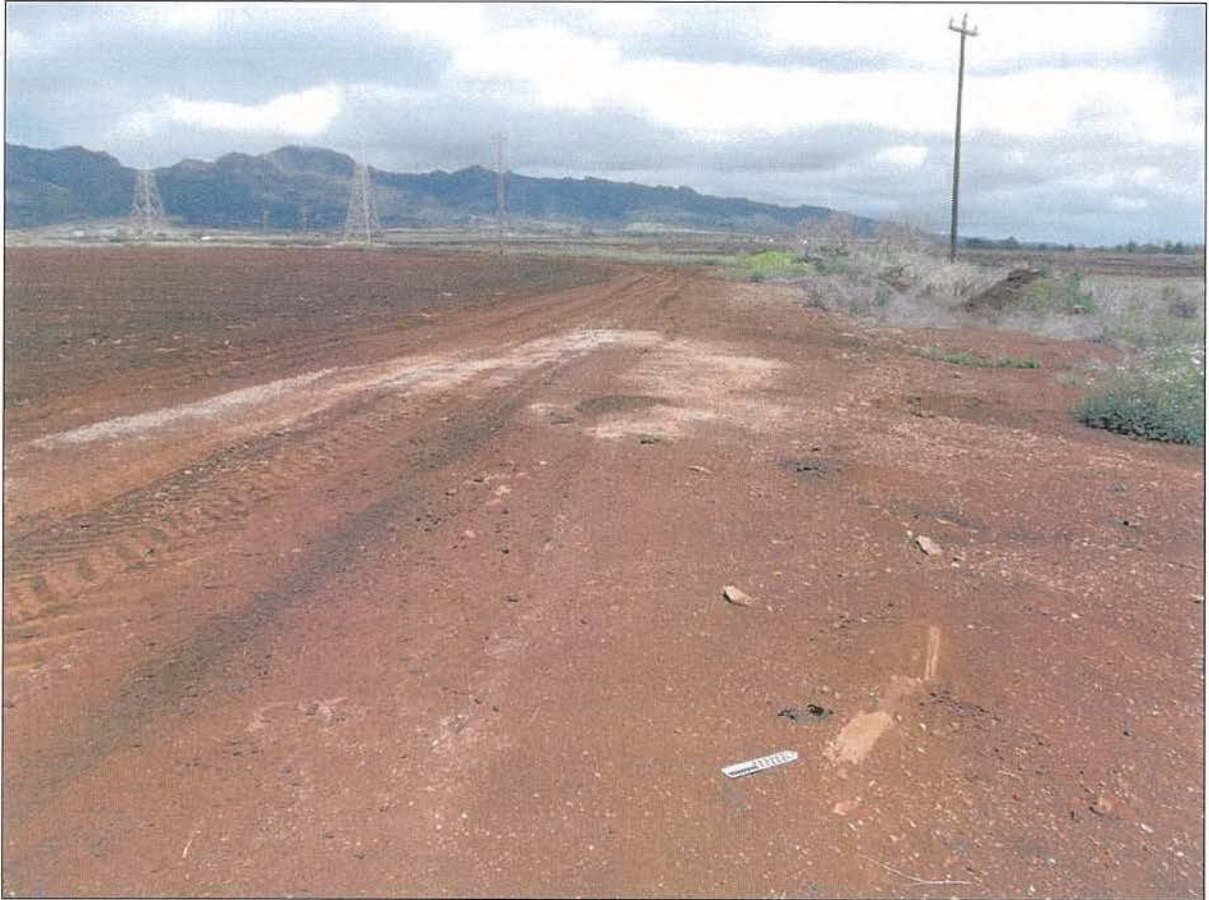


Figure 24. Overview of Feature 1 at SIHP # 50-80-08-7671, remnant of an old road (source: Wong and Spear 2015:23)



Figure 25. Overview of Feature 2 at SIHP # 50-80-08-7671, remnant of an old road (source: Wong and Spear 2015:25)



Figure 26. Overview of Feature 3 at SIHP # 50-80-08-7671, remnant of an old road (source: Wong and Spear 2015:32)



Figure 27. Representative artifacts recovered by Wong and Spear (2015), including a traditional Hawaiian artifact/basalt adze preform (#14, lower right), a 1908 copper Indian-head penny (#3), and a glass bottle sherd manufactured using a technique common from 1880s to 1920s

Plateau Lands Adjacent to Gulches and Drainages in the Vicinity of the Project Area

As summarized in Table 3 (above), previous archaeological studies in plateau lands in the vicinity of the current project area either report no findings (Barrera 1985a,b; Kennedy 1988; Mills 1993; Titchenal et al. 2013; Walden et al. 2013) or identify plantation-era site-features such as irrigation ditches, reservoirs, roads and rock walls (Kennedy 1987; Shideler et al. 2014; Monahan and LaChance 2020).

Immediately north of the current project area, Monahan and LaChance (2020) conducted an AIS of approximately 160 acres of plateau lands on a portion of TMK (1) 9-4-003:001. The AIS documented four (4) historic properties—designated SIHP # 50-80-08-8850, SIHP # 50-80-08-8851, SIHP # 50-80-08-8852, and Site # 4 (which is a temporary/field site designation). One of these historic properties (Site # 4), a heavily damaged/functionally destroyed sluice gate, was evaluated as *not* a significant historic property, based on its more or less destroyed condition (hence, no formal SIHP # was obtained/assigned to this damaged resource). The other three sites—two earthen (dirt) roads and a stack/pile of basalt boulders used as a shaping area to create dressed basalt blocks—were evaluated as *significant* historic properties under criterion “d.”

Kennedy's (1987) reconnaissance survey about one mile northwest of the current project area recorded portions of the Waiāhole Ditch Irrigation System (SIHP # 50-80-08-2268), a 26-mile-long complex of tunnels and ditches draining water from windward Kahana Valley in the Ko'olau Mountains to the 'Ewa region; and two reservoirs that were not assigned SIHP #s.

Shideler et al.'s (2014) AIS included two reservoirs associated with the Waiāhole Ditch Irrigation System. One of the reservoirs (#225) is located along the east side of Kunia Road in a small portion of TMK (1) 9-4-003:001, about ¾-mile northwest of the current project area (the other reservoir is much farther away to the west on Monsanto land, west of Kunia Road). Numerous features of the nearby reservoir were documented.

Gulch and Drainage Surveys

Riford and Cleghorn's (1986) survey in Waikakalaua Gulch (also known as Waikele Stream) in Waikele, bordering the current project area on its east side, identified three pre-Contact sites and two historic-period sites. The pre-Contact sites were all rockshelters or caves with cultural material: SIHP # 50-80-08-2919 is a pre-Contact rockshelter with cultural materials inside; SIHP # 50-80-08-2920 is three caves interpreted as a pre-Contact temporary habitation site; and SIHP # 50-80-08-2921 is a cave and crawl space with cultural material on the ground surface. The historic-period sites were SIHP # 50-80-08-2922, a basalt rock quarry; and SIHP # 50-80-08-2923, a rock wall along the top of the gulch edge.

Hammatt et al.'s (1988) survey in Waikakalaua Gulch (also known as Waikele Stream) in Waikele, starting immediately northeast of the current project area and extending to the north, identified two small terraces interpreted as historic-period (sugar cane agriculture) structures; and one railroad berm. No SIHP #s were assigned to these sites, which were determined to be not historically significant at the time (probably these would receive one or more SIHP #s if identified today).

Tomonari-Tuggle and Welch's (1994) survey of Kīpapa Gulch (Waikele and Waipi'o Ahupua'a), well east of the current project area, identified two sites: SIHP # 50-80-08-4935, a pre-Contact rockshelter and cave with traditional Hawaiian artifacts; and SIHP # 50-80-08-4936, a twentieth-century railroad bed.

Another survey in a portion of Kīpapa Gulch (Waikele and Waipi'o Ahupua'a) by Tomonari-Tuggle and Erkelens (1995) survey of identified two sites: SIHP # 50-80-08-4937, a pre-Contact rockshelter and cave with cultural materials; and SIHP # 50-80-08-4938, a 50-m long terrace on the north bank of the gulch.

COMMUNITY FEEDBACK

The scope of effort and consultation process for community outreach is described above (see METHODS).

In this section, we present the results of community outreach.

The purpose of presenting this information is to allow community members the opportunity to express their views in their own words, unfiltered by *our* analysis and interpretation, which we present in the final main section of this report (see CONCLUSION – CULTURAL IMPACT ANALYSIS).

Overview

In general, despite reaching out to 23 individuals and/or organizations, we received relatively little substantive feedback.²⁰

Staff at the State Historic Preservation (SHPD) recommended a number of organizations that we reached out to (see Table 1, above).

Staff at the Office of Hawaiian Affairs (OHA) indicated they would have no specific comment on the proposed project or the CIA study.

The notification in *Ka Wai Ola* (see Appendix D) yielded no responses.

One individual, McD Philpotts (kama'āina, local historian of Honouliuli, and a frequent contributor to CIA studies), indicated he had no specific knowledge of the project area.

The relative lack of substantive response to participate in the CIA study appears to be related to two main causes:

1. Hawaiians, in particular, have been disconnected from the project area lands for well over a century, and perhaps as long as two centuries; initially, they were pushed off these lands by ranchers in the early to middle 1800s, then, starting in the late nineteenth century, by O'ahu Sugar Co.; commercial sugar cane operations continued into the 1990s; and
2. This study has been conducted during the COVID-19 global pandemic, which has most likely dampened or suppressed at least some peoples' desire to participate, since they may have other, more pressing concerns.

In any case, two long-time Hawaiian activists and contributors to cultural studies, Tom Lenchanko and Shad Kane, were kind enough to contribute some of their mana'o.

Shad Kane

On June 6, 2020, Uncle Shad emailed the following:

I haven't responded to your request for consultation simply because I am not familiar with that area neither anyone I know. I leased 10 acres across Kunia at Pohakea where I kept horses and familiar with the cultural landscape of Kupehau and Lihue. I have been in the area makai of the golf course next to Kunia but not that far northeast where your project will be located. The only thing I can share the ancient Hawaiian name for that area is Keahumoa. It served as a residence for some chiefs born at Kukaniloko. There was a large population of people anciently in that area because of access to fresh water in the valleys. One such chief was Kaha'i-a-ho'okamali'i.

²⁰ It is important to note that extensive oral-historical information about the project area environs and ahupua'a, gathered by other researchers for other projects and also reconstructed from historical newspapers, is included in this CIA report (see ORAL HISTORY, and HISTORICAL-PERIOD NEWSPAPER ACCOUNTS ABOUT WAIKELE & HŌ'AE'AE AHUPUA'A).

Although born on Oahu he considered himself Tahitian. As a navigator he made several trips to Tahiti. Sorry I cannot help you any more than that.

Tom Lenchanko

On 6/5/2020, Chris Monahan and Tom Lenchanko spoke by phone for about 30 minutes. We have known each other for almost 15 years, and have worked on a few, previous cultural-resource projects, including Waimea Valley (O'ahu), Kūkaniloko, U.S. Army Stryker projects, and others (e.g., Monahan 2008 [revised 2015]; Monahan 2009; Uyeoka et al. 2017). Tom is a life-time member of the Hawaiian community of Wahiawā, O'ahu, and has been actively involved for several decades in protecting and perpetuating Pu'uhonua Kūkaniloko, specifically, and central O'ahu, in general. Tom describes himself as a Hawaiian National and descendant to burial sites, and our ancients and wahi kūpuna (ancestral places) of "an older O'ahu," predating even the early historic-period invasions by warrior chiefs from Maui (e.g., Kahekili) and Hawai'i Island (e.g., Kamehameha). As such, Tom understands and advocates for an understanding and recognition of land boundary concepts that are older than even the ahupua'a/moku system. A full explanation of this ancient, indigenous land management system, known as Kā'ānani'au, is beyond the scope of this CIA; however, it has been discussed in previous documents (e.g., Monahan and Silva 2007; Genz 2011; Lenchanko 2015).

Tom's main concern regarding the proposed solar project and CIA is the matter of land boundaries, and ensuring that old boundaries are not destroyed, erased or modified by historic-period or modern actions by government entities that have no legitimacy to do so. He does not recognize TMK boundaries as legitimate for they are foreign liens against Hawaiian laws, tenant rights and their relative property. He does not necessarily recognize historic-period land ownership documents generated by during the Māhele (e.g., Land Commission records). Per Tom's request, I sent him a copy of all maps, figures and graphics in the subject report for his review and records.

Tom also recounted a time when specific palena stones (at or near the location of where the powerlines cross the landscape, immediately north of the current project area) were relocated without consulting the most knowledgeable persons, na kūpuna (the elders); as a result, several people were killed in an accident along Kunia Road. In general, Tom always advises against the intrusion of strangers doing things, and altering the landscape, where they have no permission to be there nor have an exact and concise family relationship with the 'āina (place or landscape).

Tom does not support the proposed solar project, and he questions the overall positive impact (amount of energy or power) that will actually be produced by such a project.

CONCLUSION – CULTURAL IMPACT ANALYSIS

This section presents two kinds of analysis. First, we summarize the traditional and customary practices associated with the project area; cultural resources that support these practices; and other beliefs about the project area that relate to these resources and practices. These categories of information come directly from the Guidelines for Assessing Cultural Impacts, adopted by the Environmental Council, State of Hawaii, November 19, 1997 (see Appendix B for an excerpt).

Second, we make recommendations—mostly by organizing, refining and arranging the suggestions and ideas voiced by the community members interviewed by others in the past, and during the current Cultural Impact Assessment (CIA).

Cultural Resources, Practices and Beliefs Associated with the Project Area

This information is a synthesis of the results of four major content sections of this report (CULTURAL AND HISTORICAL CONTEXT, PREVIOUSLY-RECORDED ORAL-HISTORICAL INFORMATION, ARCHAEOLOGICAL CONTEXT and INTERVIEW SUMMARIES); in particular, oral history interviews by previous researchers and other writers (e.g., Ohira 1997; Maly and Maly 2012; Cruz et al. 2017; Judy Vorfeld website n.d.), archaeological surveys (e.g., Wong and Spear 2015; Monahan and LaChance 2020), information from other archival resources including historic-period newspapers, and our project-specific interviews with members of the community.

In this section, we do not reiterate all of the supporting evidence, citations and previous studies and reports upon which our assessment is based. Here, we simply present our analytical synthesis of the information; readers wanting more supporting evidence or details need to refer back to the previous four sections.

1. The project area is part of the uplands of Waikele and Hō'ae'ae Ahupua'a in central O'ahu, in the moku (traditional district) of 'Ewa. This large moku, including all of the ahupua'a that include some shoreline of Pu'uloa (Pearl Harbor), was once the political center of O'ahu, and both Līhu'e in the uplands of Honouliuli as well as the Waipi'o peninsula were once royal seats of power. The Waikele portion of the project area is in the 'ili of Pouhala, more generally depicted on historical maps as "Lower Pouhala."
2. Compared with most other ahupua'a in 'Ewa and on O'ahu, the shape and configuration of both Waikele and Hō'ae'ae is atypical. Their contours and upper reaches do not include ridge lines, mountain tops or prominent pu'u, as with most other ahupua'a; instead, their upper reaches generally follow plateau lands above deep drainages and terminate (in their mauka areas) on the broad, elevated uplands between the Wai'anae and Ko'olau ranges. In keeping with these unusual configurations, these ahupua'a's stream drainages all originate in other, neighboring ahupua'a.
3. Waikele's naming, as well, is somewhat unusual because most people are more familiar with the name Waipahu, which describes Waikele's best known pūnāwai (fresh water spring) and its historic and current population center. Waikele can be translated as "muddy water," but another meaning of the word "kele" is also lush, greasy or fat. Waipahu translates as "bursting water," as in water bursting forth from underground, or "exploding water." A (translated) description of this spring in a Hawaiian language newspaper (Ku'okoa) said that it "leaped out with the force of a river." Hō'ae'ae can be translated "to make soft or fine". Thrum believed that Hō'ae'ae meant "to pulverize." Taken together, these interpretations may refer to food processing (e.g., pounding or grinding taro or breadfruit).
4. Based on its physiographic setting on plateau lands above deeply-dissected drainages, and prior to being completely plowed under many times by mechanized, sugar cane plantation activities, the project area would have been used by Hawaiians in traditional times for dryland

(rain-fed) cultivation and possibly scattered temporary house sites and work areas associated with visiting and maintaining their upland gardens.

5. With two exceptions, all of Waikele and Hō'ae'ae's most celebrated, traditional cultural and natural resources, and those that figure prominently in mo'olelo (oral-historical accounts, legends and cosmological narratives), are more than two miles makai (seaward) of the project area, at, or very close to, the shoreline of Pu'uloa (Pearl Harbor) and the mouths of Kapakahi (the name for the lower reaches of Waikele Stream) and Hō'ae'ae streams, where the prime lo'i kalo (irrigated taro) gardens, fishponds, major heiau, and village settlements once were concentrated.
6. Documented wahi pana in the upland areas, in which the current CIA project area is located, are limited to a well-known, traditional mauka-makai trail—once following more or less the current alignment of Kunia Road, and a series of rockshelters and caves in the cliffs and side slopes of the Waikele (also known as Waikakalaua) Stream drainage, immediately east of the project area. These rockshelters and caves, which contain evidence of traditional Hawaiian use as temporary shelters and associated small gardens, largely escaped the destructive forces of the plantation-era, mechanized agriculture up on the adjacent plateaus.
7. Prior to around 1800, the project area would have consisted of lowland forest with “slash and burn” type (also known as swidden) cultivation areas created by Hawaiian subsistence farmers. Early to middle nineteenth century deforestation of the project area and environs—related to both the 'iliahi (sandalwood) trade and to supplying lumber to build out Honolulu, as well as the introduction of grazing ungulates, would have had a negative impact on the landscape's overall health and well-being (e.g., increasing soil erosion, introduction of weedy invasive plants, etc.).
8. Mo'olelo associated with Waikele include numerous references to Pu'uloa (Pearl Harbor) and its rich abundance of marine and estuary resources; the pūnāwai (fresh-water spring) of Waipahu; various stories about manō (sharks); including Ka'ahupāhau (manō goddess), Kahi'ukā (manō god), and Mikololou (man-eating manō); and the gods, Kāne and Kanaloa, as well as other gods such as Kamapua'a (pig god); mo'olelo about Hō'ae'ae also include references to Pu'uloa and its many resources and harbors; manō (shark) stories, including Ka'ahupāhau (manō goddess); legends of a mythical traveler from Kahiki named Ka'uluakaha'i and his son Namakaokapā'o; and historical references to the famous, eighteenth-century paramount Maui chief Kahekili.
9. The Hō'ae'ae portion of the project area is part of Land Commission Award no. 193 to Lewis Rees of 3,453 acres; this award was described in the Indices of Awards (1929) as a “conditional Award.” Rees claimed to have received the land “as pasturage” from Manuia in 1829, which is consistent with this land's early historic-period use for ranching. Rees had a conflict of ownership with another individual (Namauu, or Nāmau'u), who “has lately [in 1846] forbidden me to occupy it longer.” Several witness testimonies indicate the land (in 1828 or 1829) was relatively dry and lacked water, and that much work by Rees had to be completed to make it useful for pasturing his livestock. The Waikele portion is part of a rare type of nineteenth-century land award, known as a “Mahele Award” (not the same as a Land Commission Award), which were issued *after* the dissolution of the Land Commission (in 1855) by the Minister of the Interior to a chief or konohiki who had not yet obtained an award on land(s) recorded in the Mahele Book as quitclaimed by the King. The project area is part Mahele Award no. 4 ('āpana 1) to konohiki Luluhiwalani, who received ½ of the 'ili of Pouhala, consisting of 2,829.2 acres (Royal Patent 4486), but also had disputes with another claimant. The awarded land was described as having 4 house sites, although no specific location is provided for these. There are no other details as to maka'āinana (commoners)

presence on this (Waikele) land, which was generally described as kula land, that is, relatively dry lands where irrigated agriculture was not traditionally practiced.

10. The U.S. military wanted and managed to obtain exclusive access to Pu'uloa, which they called Pearl Harbor, as early as 1873, and offered the sugar cane industry free trade or reciprocity in exchange. A reciprocity treaty was concluded in 1876, and by 1887, the treaty was renewed and the U.S. received exclusive rights to enter and use Pearl Harbor. Other major commercial developments, such as the founding of the Oahu Railway and Land Co. (OR & L) in 1899, and artesian-well drilling for irrigation purposes, contributed to the start of the Oahu Sugar Company Co. in 1897, whose cane fields eventually completely subsumed the current project area.
11. The Oahu Sugar Company consisted of some 12,000 acres of land, and its field hands and other laborers were mostly Japanese, Chinese and Filipino, with smaller numbers of Hawaiians and Portuguese. Skilled ("white collar") employees came primarily from Germany. Water to irrigate the upper cane fields was initially pumped up from near the coastline at Pu'uloa to elevations of 500 ft by some of the "largest steam pumps ever manufactured," which was extremely expensive. This led to the proposal to transport water from the windward side of O'ahu, and the Waiāhole Water Company was formed in 1913 to dig a tunnel through the Ko'olau range to transport runoff from the eastern side of the mountains. By 1925, the population of the plantation, centered in Waipahu, ranged from 9500-10,000 people. There were approximately 2,850 names on the payroll and it was estimated that at least $\frac{3}{4}$ of the residents of Waipahu earned a living in connection with the production of sugar.
12. By around 1995, Oahu Sugar Company finally ceased operations; and, for the past two decades or so, the project area has been used for diversified, commercial agriculture. If the proposed solar project is constructed, this would represent the next modern phase of land use change in this part of central O'ahu.
13. Some Hawaiians, represented in this CIA by Tom Lenchanko (but sharing this view with many others), view the State of Hawai'i and U.S. government to be illegitimate and do not recognize modern land divisions or boundaries. Under this general view, the proposed solar project area is part of a much larger traditional Hawaiian landscape that was illegally partitioned and sold during the nineteenth century.

Recommendations

In general, other than being part of a much larger, traditional Hawaiian landscape, there are no specific, extant (current or contemporary) cultural or historical resources of significance in the CIA project area; nor are there any ongoing traditional and customary practices in the CIA project area. The main reasons for this are:

1. The Hawaiian sense of place was essentially erased from the project area more than a century ago when it was transformed, and literally plowed under repeatedly, by the introduction of mechanized sugar-cane agriculture by the Oahu Sugar Company (this began in 1897, and shut down for good around 1995).
2. The plantation-era "feel" or sense of place has also been essentially erased from the landscape following the circa 1995 closure of sugar cane operations. Prior to 1995, there was not a lot of plantation infrastructure, which would have been mostly limited to irrigation ditches and associated water-storage, -retention and -distribution infrastructure, as well as earthen, "cane haul" roads. The 2015 Archaeological Inventory Survey (AIS) by SCS (Wong and Spear 2015) demonstrated very little intact evidence of these plantation structures or

infrastructures; and, in general, dirt roads and degraded/broken irrigation lines and culverts do not engender much cultural or historical nostalgia.

Regarding the *past* (not the present day):

1. The CIA project area's most tangible cultural resource and/or traditional and customary practices relevance is not so much its traditional Hawaiian sense of land use or history—which is overwhelmingly focused on the makai areas about two miles to the south, at, or very close to, the shoreline of Pu'uloa (Pearl Harbor) and the mouths of Kapakahi (the name for the lower reaches of Waikele Stream) and Hō'ae'ae streams, where the prime lo'i kalo (irrigated taro) gardens, fishponds, major heiau, and village settlements once were concentrated.
2. Rather, the project area's "past glories" are mostly related to its plantation days. Currently, there are at least two organizations and museums that exist to preserve and tell the stories of the plantation lifestyle in 'Ewa, including: (1) Waipahu Cultural Garden Park and Hawai'i's Plantation Village and (2) Kapolei Heritage Center.

In summary, we have determined that the proposed solar project will have no negative impacts on traditional and customary practices associated with the project area; cultural resources that support these practices; and/or other beliefs about the project area that relate to these resources and practices. That is because, consistent with the decision of the Hawaii Supreme Court in *Ka Pa'akai O Ka 'Āina v. Land Use Commission*, 94 Hawai'i 31, 74, 7 P.3d 1068, 1084 (2000), there are no valued cultural, historical or natural resources in the project area and therefore no such resources—including traditional and customary native Hawaiian rights—will be affected or impaired by the proposed solar farm.

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APPENDIX A - SHPD's 2015 Acceptance Letter of AIS by SCS for this project

DAVID Y. IGE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

CART Y. S. CHANG
MEMBER CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

DANIEL S. QUINN
DEPUTY FIRST DEPUTY

W. ROY HARDY
ACTING DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENFORCEMENT
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWEI LAKE RESERVE COMMISSION
LAND
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
Waialeale 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, Waialeale 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

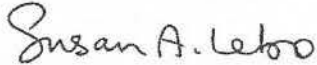
TCP Hawaii, LLC
Ho'ohana Solar CIA

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 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)
Robert Spear, PhD, Scientific Consultant Services, Inc. (bob@scshawaii.com)

APPENDIX B – State OEQC Guidelines for Assessing Cultural Impacts

Excerpt (pp. 11–13) from *Guide to the Implementation and Practice of the Hawaii Environmental Policy Act*, 2012 Edition, State of Hawai'i, Office of Environmental Quality Control (available online at http://oeqc.doh.hawaii.gov/Shared%20Documents/Misc_Documents/Guide%20to%20the%20Implementation%20and%20Practice%20of%20the%20HEPA.pdf)

GUIDELINES FOR ASSESSING CULTURAL IMPACTS

(Adopted by the Environmental Council, State of Hawaii, November 19, 1997)

I. INTRODUCTION

It is the policy of the State of Hawaii under Chapter 343, HRS, to alert decision makers through the environmental assessment process about significant environmental effects which may result from the implementation of certain actions. An environmental assessment of cultural impacts gathers information about cultural practices and cultural features that may be affected by actions subject to Chapter 343, and promotes responsible decision-making.

Articles IX and XII of the State Constitution, other state laws and the courts of the state require government agencies to promote and preserve cultural beliefs, practices, and resources of native Hawaiians and other ethnic groups. Chapter 343 also requires environmental assessment of cultural resources, in determining the significance of a proposed project.

The Environmental Council encourages preparers of environmental assessments and environmental impact statements to analyze the impact of a proposed action on cultural practices and features associated with the project area. The Council provides the following methodology and content protocol as guidance for any assessment of a project that may significantly affect cultural resources.

II. CULTURAL IMPACT ASSESSMENT METHODOLOGY

Cultural impacts differ from other types of impacts assessed in environmental assessments or environmental impact statements. A cultural impact assessment includes information relating to the practices and beliefs of a particular cultural or ethnic group or groups.

Such information may be obtained through scoping community meetings, ethnographic interviews and oral histories. Information provided by knowledgeable informants, including traditional cultural practitioners, can be applied to the analysis of cultural impacts in conjunction with information concerning cultural practices and features obtained through consultation and from documentary research.

In scoping the cultural portion of an environmental assessment, the geographical extent of the inquiry should, in most instances, be greater than the area over which the proposed action will take place. This is to ensure that cultural practices which may not occur within the boundaries of the project area, but which may nonetheless be affected, are included in the assessment. Thus, for example, a proposed action that may not physically alter gathering practices, but may affect access to gathering areas would be included in the assessment. An ahupua'a is usually the appropriate geographical unit to begin an assessment of cultural impacts of a proposed action, particularly if it includes all of the types of cultural practices associated with the project area. In some cases, cultural practices are likely to extend beyond the ahupua'a and the geographical extent of the study area should take into account those cultural practices.

The historical period studied in a cultural impact assessment should commence with the initial presence in the area of the particular group whose cultural practices and features are being assessed. The types of cultural practices and beliefs subject to assessment may include subsistence, commercial, residential, agricultural, access-related, recreational, and religious and spiritual customs.

The types of cultural resources subject to assessment may include traditional cultural properties or other types of historic sites, both man made and natural, including submerged cultural resources, which support such cultural practices and beliefs.

If the subject area is in a developed urban setting, cultural impacts must still be assessed. Many incorrectly assume that the presence of urban infrastructure effectively precludes consideration of current cultural factors. For example, persons are known to gather kauna`oa, `ilima, `uhaloa, noni or ki on the grassy slopes and ramps of the H-1 freeway and some state highways on the neighbor islands. Certain landmarks and physical features are used by Hawaiian navigators for sailing, and the lines of sight from landmarks to the coast by fisherman to locate certain fishing spots. Blocking these features by the construction of buildings or tanks may constitute an adverse cultural impact.

The Environmental Council recommends that preparers of assessments analyzing cultural impacts adopt the following protocol:

- A. Identify and consult with individuals and organizations with expertise concerning the types of cultural resources, practices and beliefs found within the broad geographical area, e.g. district or ahupua'a;
- B. Identify and consult with individuals and organizations with knowledge of the area potentially affected by the proposed action;
- C. Receive information from or conduct ethnographic interviews and oral histories with persons having knowledge of the potentially affected area;
- D. Conduct ethnographic, historical, anthropological, sociological, and other culturally related documentary research;
- E. Identify and describe the cultural resources, practices, and beliefs located within the potentially affected area; and
- F. Assess the impact of the proposed action, alternatives to the proposed action, and mitigation measures, on the cultural resources, practices and beliefs identified.

Interviews and oral histories with knowledgeable individuals may be recorded, if consent is given, and field visits by preparers accompanied by informants are encouraged. Persons interviewed should be afforded an opportunity to review the record of the interview, and consent to publish the record should be obtained whenever possible. For example, the precise location of human burials is likely to be withheld from a cultural impact assessment, but it is important that the document identify the impact a project would have on the burials. At times an informant may provide information only on the condition that it remains in confidence. The wishes of the informant should be respected.

Primary source materials reviewed and analyzed may include, as appropriate: Mahele, land court, census and tax records including testimonies; vital statistics records; family histories and genealogies; previously published or recorded ethnographic interviews and oral histories; community studies, old maps and photographs; and other archival documents, including correspondence, newspaper or almanac articles, and visitor journals. Secondary source materials such as historical, sociological and anthropological texts manuscripts, and similar materials published and unpublished, should also be consulted. Other materials, which should be examined, include prior land use proposals, decisions, and rulings, which pertain to the study area.

III. CULTURAL IMPACT ASSESSMENT CONTENTS

In addition to the content requirements for environmental assessments and environmental impact statements, which are set out in HAR §11-200-10 and 16 through 18, the portion of the assessment concerning cultural impacts should address, but not necessarily be limited to, the following matters:

- A. A discussion of the methods applied and results of consultation with individuals and organizations identified by the preparer as being familiar with cultural practices and features associated with the project area, including any constraints or limitations which might have affected the quality of the information obtained.
- B. A description of methods adopted by the preparer to identify, locate, and select the persons interviewed, including a discussion of the level of effort undertaken.
- C. Ethnographic and oral history interview procedures, including the circumstances under which the interviews were conducted, and any constraints or limitations which might have affected the quality of the information obtained.
- D. Biographical information concerning the individuals and organizations consulted, their particular expertise, and their historical and genealogical relationship to the project area, as well as information concerning the persons submitting information or interviewed, their particular knowledge and cultural expertise, if any, and their historical and genealogical relationship to the project area.
- E. A discussion concerning historical and cultural source materials consulted, the institutions and repositories searched and the level of effort undertaken. This discussion should include, if appropriate, the particular perspective of the authors, any opposing views, and any other relevant constraints, limitations or biases.
- F. A discussion concerning the cultural resources, practices and beliefs identified, and, for resources and practices, their location within the broad geographical area in which the proposed action is located, as well as their direct or indirect significance or connection to the project site.
- G. A discussion concerning the nature of the cultural practices and beliefs, and the significance of the cultural resources within the project area affected directly or indirectly by the proposed project.
- H. An explanation of confidential information that has been withheld from public disclosure in the assessment.
- I. A discussion concerning any conflicting information in regard to identified cultural resources, practices and beliefs.
- J. An analysis of the potential effect of any proposed physical alteration on cultural resources, practices or beliefs; the potential of the proposed action to isolate cultural resources, practices or beliefs from their setting; and the potential of the proposed action to introduce elements which may alter the setting in which cultural practices take place.
- K. A bibliography of references, and attached records of interviews which were allowed to be disclosed.

The inclusion of this information will help make environmental assessments and environmental impact statements complete and meet the requirements of Chapter 343, HRS. If you have any questions, please call 586-4185. You may ask OEQC if a directory of cultural impacts assessment providers is available.

APPENDIX C – Consultation Outreach Materials sent to Potential Consulting Parties

This appendix contains the following documents:

1. First outreach letter mailed and emailed on March 17, 2020 (pp. C-2 to C-5) by TCP Hawai'i to notify and invite potential consulting parties to contact us with information relevant to the CIA, or to discuss any other cultural resources of concern in the project area.
2. Second outreach letter mailed and emailed on May 11, 2020 (pp. C-6 to C-14) by TCP Hawai'i to notify potential CIA-study participants of changes to the size and scope of the solar project; and to invite potential consulting parties to contact us with information relevant to the CIA, or to discuss any other cultural resources of concern in the project area.



TCP Hawai'i, LLC
Documenting Traditional Cultural Properties of Hawai'i
Preserving and Restoring Cultural and Natural Resources of Hawai'i

March 17, 2020

Aloha Kākou,

On behalf of the project owner, Ho'ohana Solar I, LLC (Ho'ohana Solar), and its planning consultant, Group 70 International, Inc. (G70), we have been hired to conduct a Cultural Impact Assessment (CIA) of an approximately 320-acre project area for the Ho'ohana Solar Energy Facility in Waikele and Hō'ae'ae Ahupua'a. These lands, which include TMK (1) 9-4-002:052 and 9-4-003:001 (por.), are owned by Robinson Kunia Land, LLC (see Figure 1 and Figure 2).

We are writing to provide you with some information about the project, and to ask if you or your organization would be interested in providing your mana'o (input, ideas or concerns) about any cultural or historical resources or other information you believe may be relevant to our CIA study. This could include mo'olelo (oral history) or any recollections about the project area in the past, or use of these lands that may include (in the past or currently) traditional and customary practices.

Background on the Solar Project

In 2018, Ho'ohana Solar was awarded a Hawaiian Electric Company (HECO) Request for Proposals for Variable Renewable Dispatchable Generation project. The solar facility includes both of the aforementioned TMKs (for a total of approximately 320 acres). The solar project is sized at 52 megawatts (MWac) with battery storage.

Background on Historic-Preservation Review Process

In 2014, Scientific Consultant Services (SCS) completed an Archaeological Inventory Survey (AIS) for a Conditional Use Permit for the southern portion of the Ho'ohana Solar Energy Facility (TMK [1] 9-4-002:052). This 2014 AIS report, which was accepted by the State Historic Preservation Division (SHPD), identified one significant historic property (a historic-period plantation road complex, State Inventory of Historic Places [SIHP] # 50-80-08-7671).

More recently, our company completed an AIS of the northern portion of the project area (i.e., a portion of TMK [1] 9-4-003:001), and identified three significant historic properties (all of which were created by plantation workers in the twentieth century): SIHP # 50-80-08-8850 (place where basalt boulders were shaped into blocks for building irrigation ditches and other such structures), SIHP # 50-80-08-8851 (dirt road), and SIHP # 50-80-08-8852 (another dirt road). The AIS report by our company was submitted to the SHPD in early February, 2020, and is currently in review.

If you would like to review the 2014 AIS report by SCS or the current (in review) draft AIS report by our company, please contact me by phone, text or email (see contact information below), and we will provide you with an electronic copy.

TCP Hawaii, LLC
Ho'ohana Solar CIA

We want to make sure, by consulting with knowledgeable individuals, including recognized cultural descendants in Waikele and Ho'āe'āe Ahupua'a, that we have done our best to seek out those who may wish to share their mana'o.

We will contact you soon to see if you would like to participate in our study, either by sitting for a formal interview or by sharing more informally by phone or email.

Mahalo for your kōkua.

With aloha,



Christopher M. Monahan, Ph.D.
TCP Hawai'i, LLC
150 Hamakua Dr., #810
(808) 754-0304
mookahan@gmail.com

cc: Tracy Camuso, G70

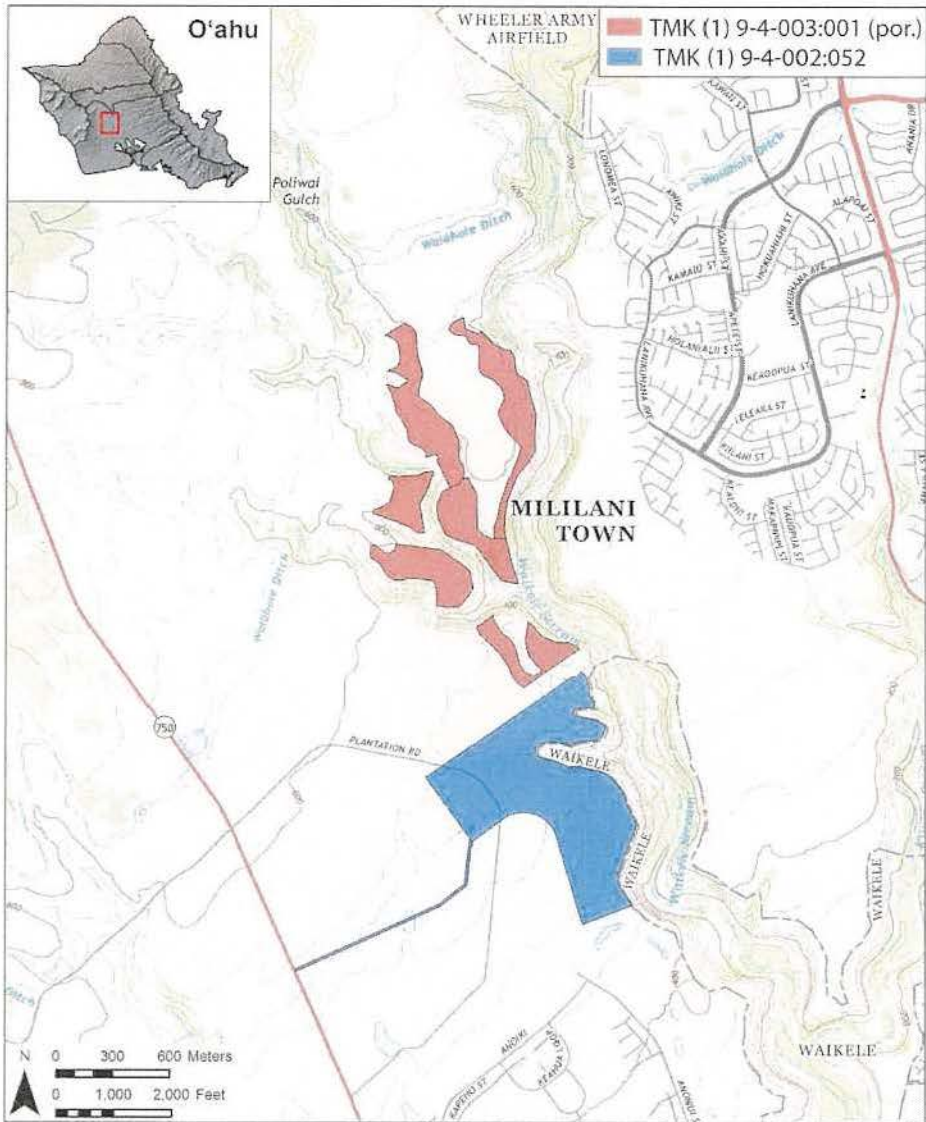


Figure 1. Project area location on a portion of USGS topographic map (1:24,000 scale) (graphic produced by TCP Hawai'i using ESRI's ArcMap 10.2.2)

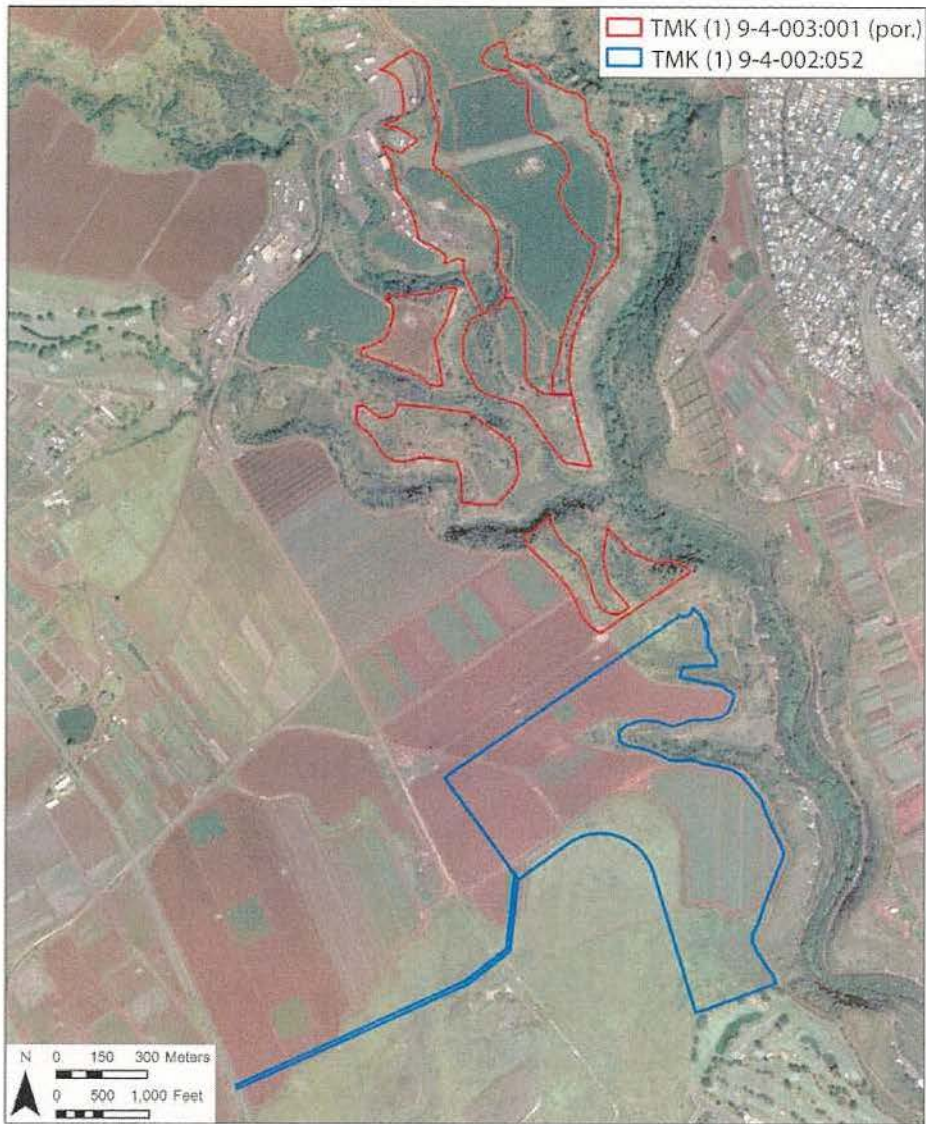


Figure 2. Project area location on an aerial image (1:4,000 scale) (graphic produced by TCP Hawai'i using ESRI's ArcMap 10.2.2)



TCP Hawai'i, LLC
Documenting Traditional Cultural Properties of Hawai'i
Preserving and Restoring Cultural and Natural Resources of Hawai'i

May 7, 2020

[name, title, address]

Aloha,

On behalf of the project owner, Ho'ohana Solar I, LLC (Ho'ohana Solar), and its planning consultant, Group 70 International, Inc. (G70), we are working on a Cultural Impact Assessment (CIA) for the Ho'ohana Solar Energy Facility in Waikele and Hō'ae'ae Ahupua'a.

About a month and a half ago, we sent a letter notification about this project to OHA-Compliance Enforcement; since, then the scope and size of the proposed project has been changed. The project area, which consists of TMK (1) 9-4-002:052, is owned by Robinson Kunia Land, LLC (see Figure 1 and Figure 2). The new project area size is approximately 161 acres, which is half of the original (approximately 320-acre project area). The size of the project area was reduced in order to preserve valuable agricultural land to the north.

For your information, Appendix A is the original letter with attachments we sent you on 3/17/20.

We are again writing to provide you with some information about the project, and to ask if you or your organization would be interested in providing your mana'o (input, ideas or concerns) about any cultural or historical resources or other information you believe may be relevant to the CIA study. This could include mo'olelo (oral history) or any recollections about the project area in the past, or use of these lands that may include (in the past or currently) traditional and customary practices.

Background on the Solar Project

In 2018, Ho'ohana Solar was awarded a Hawaiian Electric Company (HECO) Request for Proposals for Variable Renewable Dispatchable Generation project. The solar facility is sized at 52 megawatts (MWac) with battery storage.

Background on Historic-Preservation Review Process

In 2014, Scientific Consultant Services (SCS) completed an Archaeological Inventory Survey (AIS) for a Conditional Use Permit for the same area as the CIA we are now conducting. This 2014 AIS report, which was accepted by the State Historic Preservation Division (SHPD), identified one significant historic property (State Inventory of Historic Places [SIHP] # 50-80-08-7671), a historic-period plantation road complex.

More recently, our company completed an AIS of what used to be the northern portion of the CIA project area (part of TMK [1] 9-4-003:001), but which has now been removed from the CIA project area. This AIS identified three significant historic properties (all of which were created by plantation workers in the twentieth century): SIHP # 50-80-08-8850 (place where basalt boulders were shaped into blocks for building irrigation ditches and other such structures), SIHP # 50-80-08-8851 (dirt road), and SIHP # 50-

TCP Hawaii, LLC
Ho'ohana Solar CIA

80-08-8852 (another dirt road). The AIS report by our company was submitted to the SHPD in early February, 2020, and is currently in review.

If you would like to review the 2014 AIS report by SCS or the current (in review) draft AIS report by our company, please contact me by phone, text or email (see contact information below), and we will provide you with an electronic copy.

We want to make sure, by consulting with knowledgeable individuals, including recognized cultural descendants in Waikele and Hō'ae'ae Ahupua'a, that we have done our best to seek out those who may wish to share their mana'o.

We will contact you soon to see if you would like to participate in our study, either by sitting for a formal interview or by sharing more informally by phone or email.

Mahalo for your kōkua.

With aloha,



Christopher M. Monahan, Ph.D.
TCP Hawai'i, LLC
150 Hamakua Dr., #810
(808) 754-0304
mookahan@gmail.com

cc: Tracy Camuso, G70

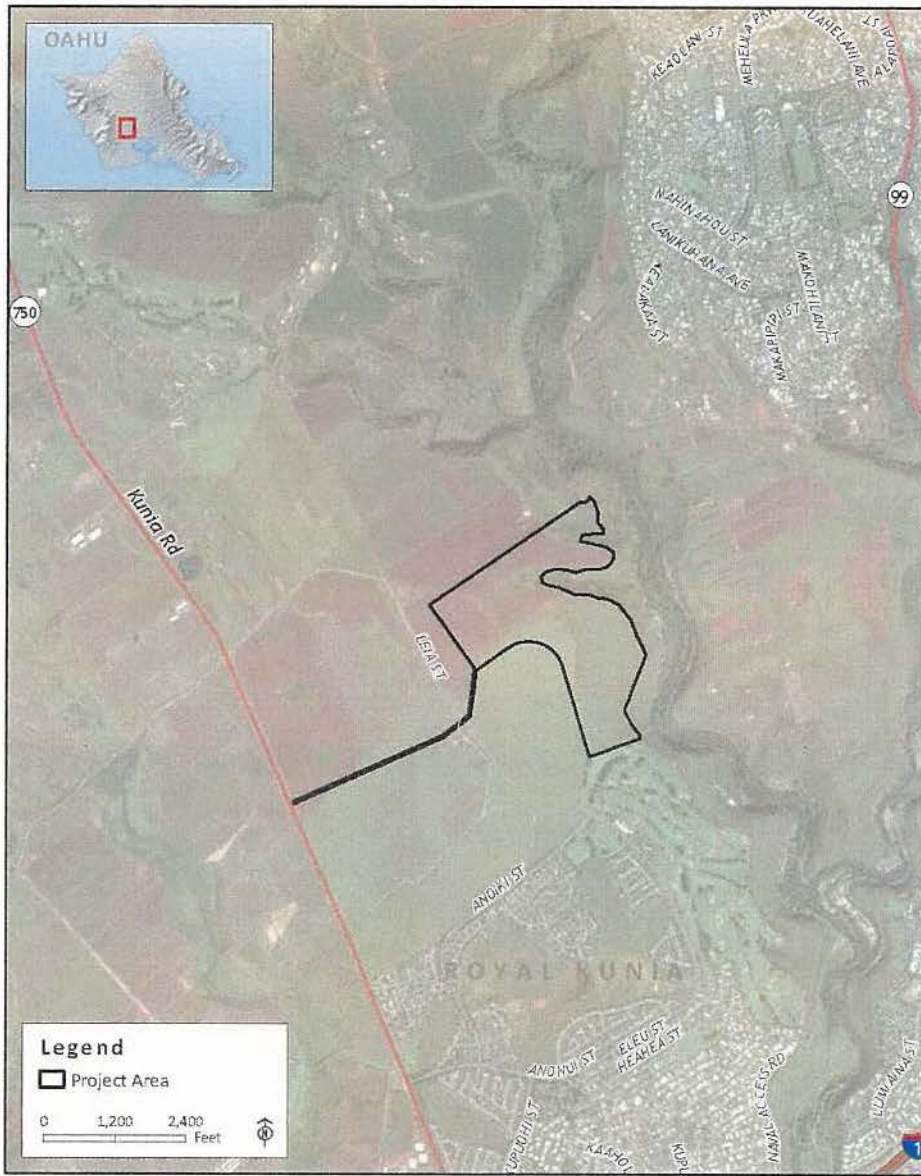


Figure 1. Project area location on aerial image (provided by G70)

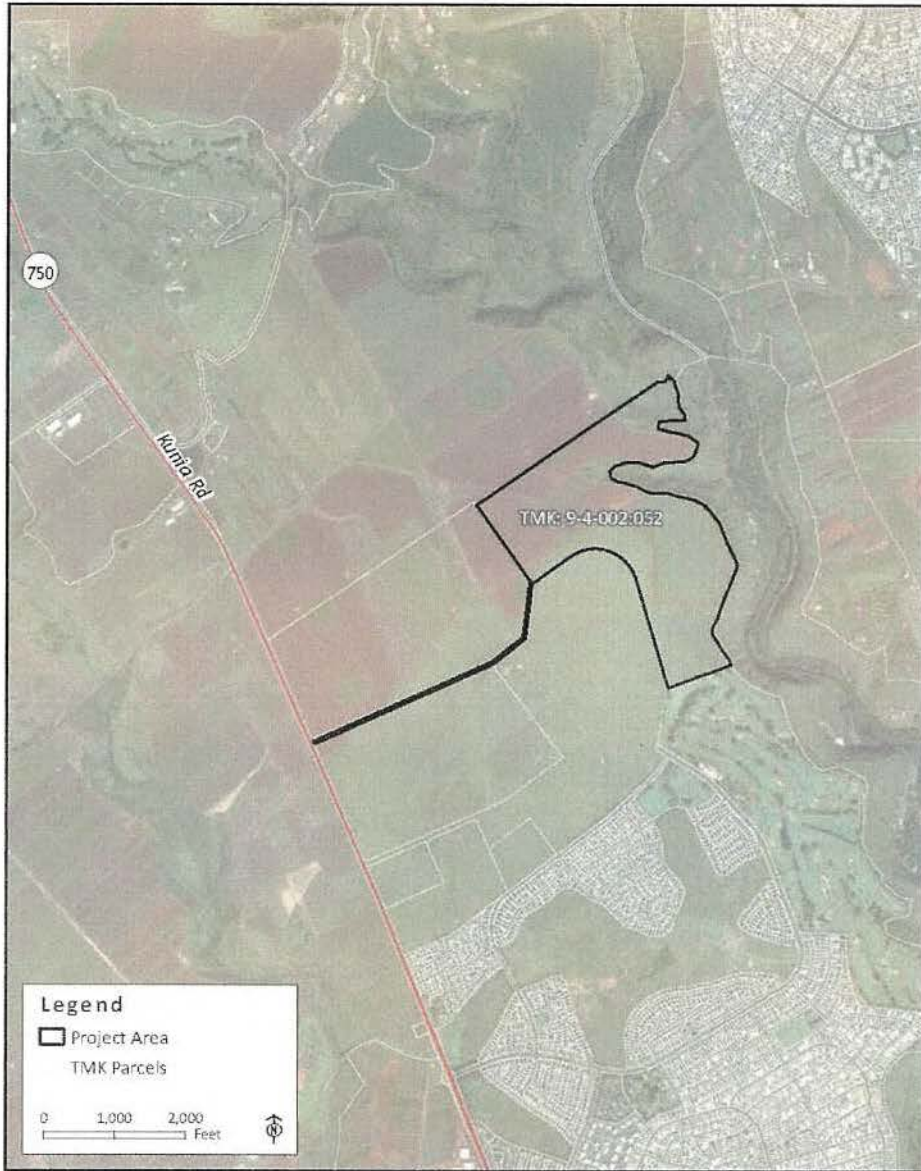


Figure 2. TMK of project area location on an aerial image (provided by G70)

APPENDIX

March 13, 2020, consultation outreach letter with attachments previously sent to you.



TCP Hawai'i, LLC
Documenting Traditional Cultural Properties of Hawai'i
Preserving and Restoring Cultural and Natural Resources of Hawai'i

March 17, 2020

Aloha Kākou,

On behalf of the project owner, Ho'ohana Solar I, LLC (Ho'ohana Solar), and its planning consultant, Group 70 International, Inc. (G70), we have been hired to conduct a Cultural Impact Assessment (CIA) of an approximately 320-acre project area for the Ho'ohana Solar Energy Facility in Waikele and Hō'ae'ae Ahupua'a. These lands, which include TMK (1) 9-4-002:052 and 9-4-003:001 (por.), are owned by Robinson Kunia Land, LLC (see Figure 1 and Figure 2).

We are writing to provide you with some information about the project, and to ask if you or your organization would be interested in providing your mana'o (input, ideas or concerns) about any cultural or historical resources or other information you believe may be relevant to our CIA study. This could include mo'olelo (oral history) or any recollections about the project area in the past, or use of these lands that may include (in the past or currently) traditional and customary practices.

Background on the Solar Project

In 2018, Ho'ohana Solar was awarded a Hawaiian Electric Company (HECO) Request for Proposals for Variable Renewable Dispatchable Generation project. The solar facility includes both of the aforementioned TMKs (for a total of approximately 320 acres). The solar project is sized at 52 megawatts (MWac) with battery storage.

Background on Historic-Preservation Review Process

In 2014, Scientific Consultant Services (SCS) completed an Archaeological Inventory Survey (AIS) for a Conditional Use Permit for the southern portion of the Ho'ohana Solar Energy Facility (TMK [1] 9-4-002:052). This 2014 AIS report, which was accepted by the State Historic Preservation Division (SHPD), identified one significant historic property (a historic-period plantation road complex, State Inventory of Historic Places [SIHP] # 50-80-08-7671).

More recently, our company completed an AIS of the northern portion of the project area (i.e., a portion of TMK [1] 9-4-003:001), and identified three significant historic properties (all of which were created by plantation workers in the twentieth century): SIHP # 50-80-08-8850 (place where basalt boulders were shaped into blocks for building irrigation ditches and other such structures), SIHP # 50-80-08-8851 (dirt road), and SIHP # 50-80-08-8852 (another dirt road). The AIS report by our company was submitted to the SHPD in early February, 2020, and is currently in review.

If you would like to review the 2014 AIS report by SCS or the current (in review) draft AIS report by our company, please contact me by phone, text or email (see contact information below), and we will provide you with an electronic copy.

TCP Hawaii, LLC
Ho'ohana Solar CIA

We want to make sure, by consulting with knowledgeable individuals, including recognized cultural descendants in Waikele and Ho'āe'āe Ahupua'a, that we have done our best to seek out those who may wish to share their mana'o.

We will contact you soon to see if you would like to participate in our study, either by sitting for a formal interview or by sharing more informally by phone or email.

Mahalo for your kōkua.

With aloha,



Christopher M. Monahan, Ph.D.
TCP Hawai'i, LLC
150 Hamakua Dr., #810
(808) 754-0304
mookahan@gmail.com

cc: Tracy Camuso, G70

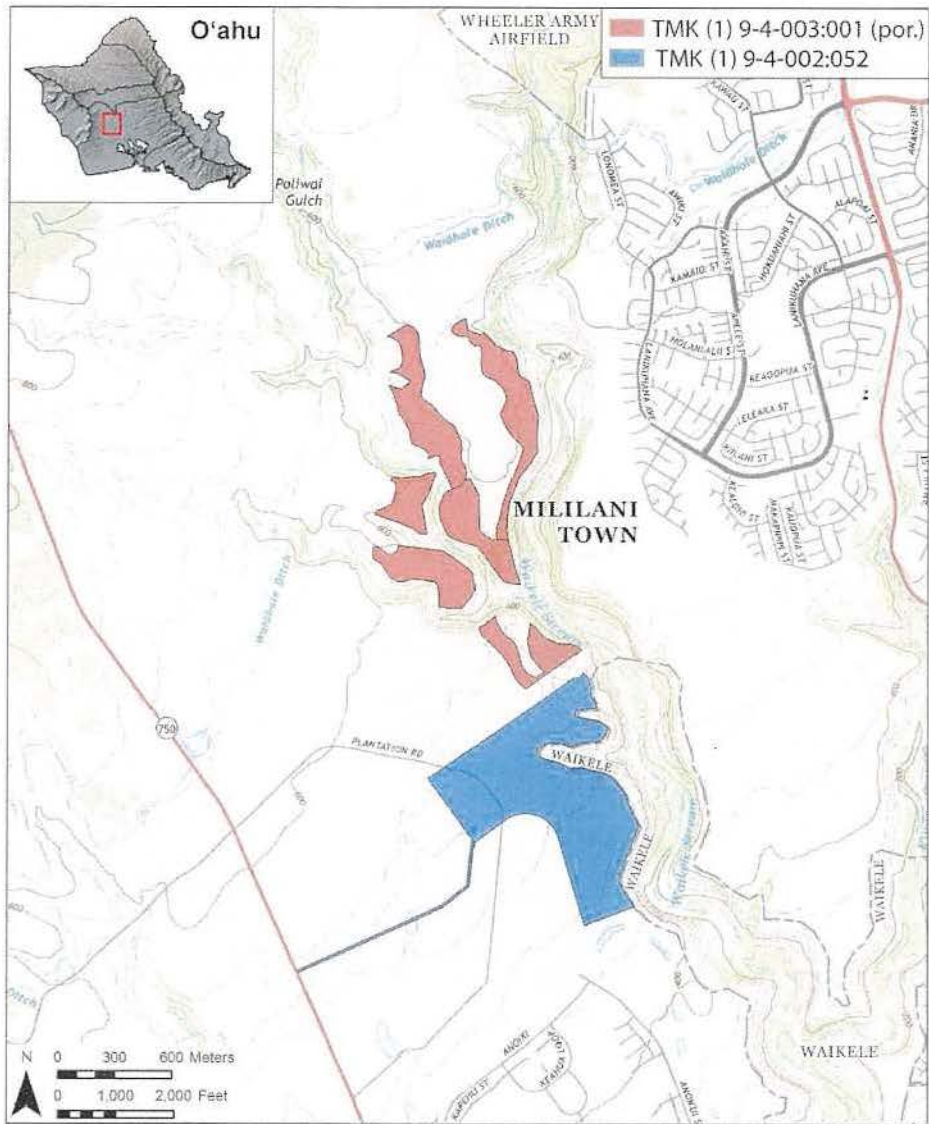


Figure 1. Project area location on a portion of USGS topographic map (1:24,000 scale) (graphic produced by TCP Hawai'i using ESRI's ArcMap 10.2.2)

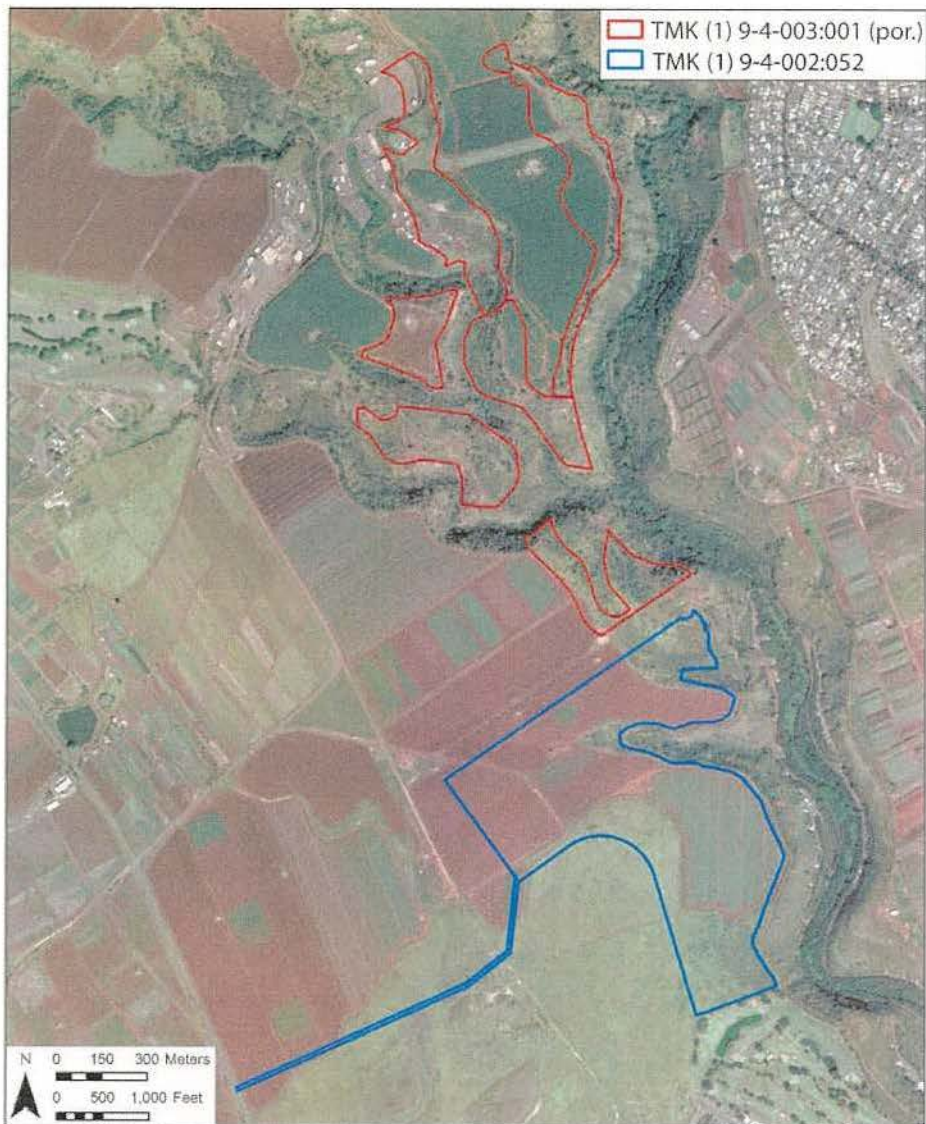


Figure 2. Project area location on an aerial image (1:4,000 scale) (graphic produced by TCP Hawai'i using ESRI's ArcMap 10.2.2)

APPENDIX D – Notification in OHA's *Ka Wai Ola* newspaper (June 2020)

22 June 2020

HO'OLAHA LEHULEHU PUBLIC NOTICE

www.kawaka.news | kwo@OHA.org
NATIVE HAWAIIAN NEWS | FEATURES | EVENTS

CULTURAL IMPACT ASSESSMENT - KEKAULIKE STREET

ASM Affiliates is preparing a Cultural Impact Assessment (CIA) for the proposed Kekaulike Street Improvements Project in the Chinatown neighborhood of downtown Honolulu, Kona District, Island of O'ahu. The City and County of Honolulu intends to convert Kekaulike Street into a shared-use street, which will improve pedestrian accessibility and safety, and promote economic and social activities in the newly created shared space between North Hotel Street and Nimitz Highway; and provide a more coherent connection between the existing Kekaulike Mall and the future Chinatown rail station at the corner of Kekaulike Street and Nimitz Highway.

In addition to its association with Chinatown, the proposed project area has been associated with the traditional land divisions Kikilale and Kapukolo, and the ahupua'a of Nu'uamu and Honolulu. We are seeking consultation with community members that might have knowledge of traditional cultural uses of the proposed project area; or who are involved in any ongoing cultural practices on or in the general vicinity of the subject Kekaulike Street. If you are willing to share any such information please contact Teresa Gotay (tgotay@asmaffiliates.com); phone (808) 439 8089, mailing address ASM Affiliates 820 Milliani St. Suite 700, Honolulu, HI 96813.

CULTURAL IMPACT ASSESSMENT - GRAND WAILEA RESORT

ASM Affiliates is preparing a Cultural Impact Assessment (CIA) associated with a Special Management Area Applica-

tion for proposed development activities at the Grand Wailea Resort, Paiahu Ahupua'a, Makawao District, Island of Maui. We are seeking consultation with community members that might have knowledge of traditional cultural uses of the proposed project area; or who are involved in any ongoing cultural practices that may be occurring on or in the general vicinity of the subject property. If you have and can share any such information please contact Lokelani Brandt (lbrandt@asmaffiliates.com); phone (808) 969 6066, mailing address ASM Affiliates 507-A E. Lanikaula Street, Hilo, HI 96720.

CULTURAL IMPACT ASSESSMENT - HO'OHANA SOLAR ENERGY FACILITY IN WAIKELE

On behalf of the project owner, Ho'ohana Solar I, LLC, and its planning consultant, Group 70 International, Inc., TCP Hawai'i, LLC, is preparing a Cultural Impact Assessment (CIA) for the Ho'ohana Solar Energy Facility in Waikale and Ho'ae'ae Ahupua'a. The project area at TMK (1) 9-4-002:052 is 161 acres. These lands are located immediately north and mauka of Royal Kunia Country Club. Please contact Chris Monahan at (808) 754-0304 or monohan@gmail.com if you would like to participate or contribute to this study by sharing your mana'o about any cultural or historical resources or other information you believe may be relevant. This could include mo'olelo (oral history) or any recollections about the project area in the past, or use of these lands that may include (in the past or currently) traditional and customary practices. Mahalo nui! ■

EMPLOYMENT WITH OHA

The Office of Hawaiian Affairs is seeking candidates for the following positions:

- Chief Operating Officer
- Chief Financial Officer
- Human Resource Director
- Land Assets Division Director
- Procurement Manager
- Public Policy Manager

For details about these positions and other positions available, please visit www.oha.org/jobs.

Contract positions subject to final needs and merit. An Equal Opportunity Employer.



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PAID FOR BY THE KELI'I AKINA CAMPAIGN COMMITTEE P.O. BOX 62312 HONOLULU, HI 96839 www.keliiakina.com