ARCHAEOLOGICAL MONITORING PLAN FOR THE PROPOSED
SOLAR FARM IN KALAELOA
HONOULIULI AHUPUAʻA, ‘EWA DISTRICT,
ISLAND OF OʻAHU, HAWAIʻI
TMK: (1) 9-1-013:070 and Coral Sea Road ROW (por.)

Prepared by:
Nigel T. Kingsbury, B.A.,
Chonnikarn Kehajit, B.A.
and
Robert L. Spear, Ph.D.
September 2017
FINAL

Prepared for:
Aloha Solar Energy Fund II, LLC
2969 Mapunapuna Place, STE 220
Honolulu, Hawaii 96819

On Behalf of Land Owner
In submittal of permits and approvals:
Hawaiʻi Community Development Authority
547 Queen Street, Honolulu Hawaii 96813
Attn: Mr. Jesse Souki, Executive Director
email: dbedt.hcda.contact@hawaii.gov
# TABLE OF CONTENTS

- TABLE OF CONTENTS ........................................................................................................................................ ii
- LIST OF FIGURES ............................................................................................................................................... ii
- INTRODUCTION .................................................................................................................................................. 1
- MONITORING REQUIREMENT ............................................................................................................................ 6
- EXPECTED FINDINGS WITHIN THE SURVEY AREA .......................................................................................... 6
- MONITORING PROVISIONS ............................................................................................................................... 8
- LABORATORY ANALYSIS .................................................................................................................................. 10
- CURATION ......................................................................................................................................................... 11
- REPORTING ..................................................................................................................................................... 11
- REFERENCES CITED ......................................................................................................................................... 12
- APPENDIX A: SHPD CORRESPONDENCE ....................................................................................................... 13

# LIST OF FIGURES

Figure 1. 1998 USGS 1:24,000 Ewa Quadrangle with project area outlined in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only, Figure 1 shows entire Coral Sea Road for visibility only). ................................................................................................................................................ 3
Figure 2 City and County of Honolulu Tax Map Key with project area in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only. Figure 2 shows entire Coral Sea Road for readability only). ............................................................................................................................................. 4
Figure 3. 2016 Google Earth Aerial Image with project area in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only. Figure 3 shows entire Coral Sea Road for readability only.) ................................................................................................................................................. 5
INTRODUCTION

Scientific Consultant Services, Inc. (SCS), at the request of Aloha Solar Energy Fund II, LLC in conjunction with Group 70 International, and on behalf of the landowner(s), Hawaiʻi Community Development Authority (HCDA), and the Hawaiʻi Department of Transportation (HDOT) right-of-way, has prepared this Archaeological Monitoring Plan (AMP) for total of approximately 40 acres of land in Kalaeloa, Honouliuli Ahupuaʻa, ‘Ewa District, Island of Oʻahu, Hawaiʻi [TMK: (I) 9-1-013:070 por.] of undeveloped land in advance of a proposed 5.0 megawatt (AC) solar farm power facility and 12 kV distribution line.

The project area is located approximately 110 m north of the ‘Ewa coastline at an elevation between 10 and 50 feet above mean sea level (amsl). Located in Honouliuli Ahupuaʻa, ‘Ewa District, Island of Oʻahu, Hawaiʻi [TMK (1) 9-1-013:70] (see Figures 1 through 3), the project area comprises approximately 22 acres within TMK: (1) 9-1-013:070 and 18.32 acres along the eastern portion of the Coral Sea Road Right-of-Way (ROW) and is located on the former Naval Air Station (NAS) Barbers Point. The project area is bounded on the north by Renton Road, to the East by various residential, commercial, and industrial parcels, and to the West by Kalaeloa Airport, and various commercial and residential parcels and to the South by Coral Sea Road.

The proposed project would involve the installation of approximately 23,500, 72-cell Photovoltaic (PV) modules mounted on elevated galvanized steel racks, which will be mounted to steel posts or piers on approximately 22 acres. Power will be transferred from the modules to five inverters and transformers to a project switchyard that will ultimately connect to HECO's electrical distribution system.

Additionally, the project would include the installation of a 12 kilovolt (kV) distribution line that would be routed from the proposed new electrical switchyard at the solar farm site (TMK: [1] 9-1-013:070) crossing over Coral Sea Road and eventually connecting to the “Kapolei Circuit” at a HECO manhole on the mauka side of Franklin D. Roosevelt Avenue. The proposed distribution line corridor would be a combination of an overhead line on poles with a segment that is underground within a duct bank line. The underground segment is required due to Federal Aviation Administration height restrictions that are in place for an aviation approach of Runway 22L and 22R at the adjacent Kalaeloa Airport (John Rodgers Field). This aviation approach extends over a small portion of Coral Sea Road. The 12-kV line would be installed within an existing State of Hawaiʻi Department of Transportation-Highways Division Right-of-Way (ROW) along the eastern side of Coral Sea Road. The ROW extends approximately 30 feet from the edge of Coral
Sea Road on the eastern side. The overhead portion of the 12-kV line would be approximately 5,600 feet in length with the underground portion approximately 3,800 feet. Ground disturbance related to the development consists of grubbing and light grading of the non-preservation portions of the project area, excavating fence posts for a perimeter fence, excavations for the posts that the elevated galvanized steel racks will connect to, and the construction of gravel roads to access the various solar farm components.

This AMP covers all ground altering activities associated with the proposed construction and associated site preparation activities leading to the construction of the project, including geotechnical soil boring studies. Archaeological monitoring is being conducted at the request of the State Historic Preservation Division (SHPD) (Letter dated April 17, 2017; Log No. 2016.02671, Doc. No. 1704SL08 – see Appendix A). This AMP has been written in accordance with the rules of the SHPD, Department of Land and Natural Resources (§13-279-4 HAR). Archaeological monitoring shall consist of onsite monitoring for all ground disturbing activities within TMK: (1) 9-1-013:070 parcel and on call monitoring for ground disturbing activities within the Coral Sea Road ROW.

This AMP will ensure that if human remains are identified during subsurface work, appropriate and lawful protocol concerning the Inadvertent Discovery of Human Remains (pursuant to §13-300-40a, b, c, HAR) is followed. This AMP will also ensure that if cultural deposits are identified, the work will satisfy reporting requirements outlined in §13-279-5(5) through (6), HAR.

This AMP does not include historical background as it was documented previously in the Medrano et al. (2014) AIS.
Figure 1. 1998 USGS 1:24,000 Ewa Quadrangle with project area outlined in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only, Figure 1 shows entire Coral Sea Road for visibility only).
Figure 2 City and County of Honolulu Tax Map Key with project area in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only. Figure 2 shows entire Coral Sea Road for readability only.).
Figure 3. 2016 Google Earth Aerial Image with project area in yellow (note, project portion within Coral Sea Road ROW is within the eastern portion of the ROW only. Figure 3 shows entire Coral Sea Road for readability only.).
MONITORING REQUIREMENT

The SHPD as part of the AIS acceptance stipulated archaeological monitoring was required for all future work within TMK: (1) 9-1-013:070 in a letter dated February 25, 2014 (Log No.: 2013.6641, 2014.00823, 2014.00528, Doc. No.: 1402SL27), within Appendix A.

The requirement of archaeological monitoring for this project was deemed necessary due to the number of historic properties identified during the Medrano et al. (2014) AIS within the TMK parcel. Furthermore, two features within this parcel were identified as burial mounds. Therefore, all ground disturbance activities within TMK: (1) 9-1-013:070 por., will be monitored by an archaeologist. However, based on the results of the Addendum AIS (Kingsbury and Spear 2017) the Coral Sea Road ROW portion will be conducted on an on-call basis. Therefore, if any inadvertent finds are discovered they will be covered by this AMP.

EXPECTED FINDINGS WITHIN THE SURVEY AREA

An AIS was conducted (and report approved by SHPD, see Appendix A) by Medrano et al. (2014) and an addendum AIS by Kingsbury and Spear (2017), prior to the drafting of this AMP. The Medrano et al. (2014) AIS resulted in the identification of 23 archaeological sites of which there are 146 component features. Site types identified within TMK: (1) 9-1-013:070 include WWII era features that include concrete structures, concrete structural remnants, and limestone walls and platforms. Additionally, the site contains military features such as aircraft wreckage. The site also contains pre-Contact to post-Contact agricultural limestone mounds, cairns, karst pits, and improved karst pits (walled or divided), “C” shapes, “U” shapes, “J” shapes, reverse “F” shapes, all constructed of limestone cobbles and boulders. Additionally, evidence of temporary habitation has been identified by limestone enclosures.

The Addendum AIS (Kingsbury and Spear 2017) did not identify any historic properties within the Coral Sea Road ROW.
Figure 4. 1998 USGS 1:24,000 Ewa Quadrangle Map with illustrated site locations in blue.
Based on the findings of the AIS, Medrano et al. (2014), and the Addendum AIS (Kingsbury and Spear (2017) conducted within the subject parcel and the past archaeological studies previously conducted in the adjoining parcels, a number of site types could be expected. The following are site types and feature types likely to be encountered during archaeological monitoring:

- Pre-Contact to post-Contact Agricultural / habitation complexes comprised of archaeological features including low rock mounds, walled dissolution pit caves, possible culturally enriched dissolution pit caves, dry stacked coral cobses in “C” shape, “J” shapes, “F” shapes, low rock stacked walls, platforms, and midden.

- Historic transportation sites consisting of compacted coral roadways.

- Military sites consisting of old bunkers, structural remnants, shell casings, air plane debris, military field gear, or other items.

- Historic era walls and platforms.

Yet to be identified features or sites would likely be encountered in the thickly vegetated areas of the project area. The thick vegetation could have possibly concealed sites or additional features from discovery during the AIS. Additionally, the wooded area appears less disturbed than the grass strip near Runway 29.

**Monitoring Provisions**

This AMP has been prepared in accordance with DLNR-SHPD rules governing standards for Archaeological Monitoring (§13-279-4). Archaeological monitors will adhere to the following guidelines during monitoring:

1. A qualified archaeologist familiar with the project area and the results of previous archaeological work conducted in the area will monitor subsurface construction all activities in the project area. If significant deposits or features are identified and additional field personnel are required, the archaeologist will notify the contractor or representatives before additional personnel are brought to the site.

2. If non-burial historic properties (e.g., cultural layer, pit features) are identified during Archaeological Monitoring, the on-site archaeologist has authority to temporarily suspend construction activities in the area of the find to allow the archaeologist to
identify and appropriately document the non-burial find in accordance with reporting requirements specified in HAR §13-279. SHPD archaeologists shall be consulted regarding the identification, appropriate documentation, and assessment of the site significance. Documentation shall include recording its location using a hand-held GPS unit; plotting its location on a scaled site map; taking digital photographs with scale and north arrow, and where possible, in both plan view and profile; illustrating feature morphology in scaled plan view and profile drawings; recording dimensions (length, width, depth, etc.); screening at least a 25% sample of a cultural deposit [or other % as determined in consultation with SHPD] through 1/8-inch wire mesh screen to identify potential small-fraction remains; screening a measured volume of pit fill matrix through 1/8-inch wire mesh screen to facilitate identification of pit function; documenting in the field historic artifacts in large infilled pit features and fill layers, including digital photographs with scales, and descriptions of the range of artifact types and relative abundance of types; and collecting a representative sample of historic artifacts from cultural layers and pit features to facilitate identification of function and age. Construction work will only continue in the immediate area of the non-burial find when all documentation has been completed.

3. Stratigraphy will be recorded to provide an accurate sequence from the top to base of excavation. Soil descriptions will be completed using USDA soils terminology and attributes and soil colors will be recorded using Munsell Soil Color charts or manuals. Photographs with scales and north arrows will be taken of all locations where stratigraphic profiles are recorded.

4. In the event that human remains (burial or isolated, displaced skeletal elements) are inadvertently encountered, all work in the immediate area of the find will cease, the area and human remains will be secured, and the archaeologist will immediately notify the Police, SHPD (archaeologist and burial sites specialist staff), and the island burial council geographic region representative. Treatment of the human remains (including archaeological documentation) shall be in accordance with Hawaii Revised Statutes §6E-43.6, Hawaii Administrative Rules §13-300-40, and SHPD directives. Work will resume in the location of the inadvertent find only following SHPD approval.

5. The archaeologist shall conduct a coordination meeting or briefing with all construction personnel prior to initiation of the project to ensure that contractors and the construction crew are aware of the requirement for archaeological monitoring to be
conducted for all ground-disturbing activities, the types of historic properties (non-burial and burial) that may be encountered, the provisions regarding monitoring stipulated in the AMP, including proper protocol should construction activities result in inadvertent discovery of human remains and/or non-burial historic properties. They shall also be informed that removal of any artifacts or photography of human remains is prohibited.

6. The archaeologist shall be responsible for conducting all coordination with the contractor, SHPD, and any other group involved in the project. The archaeologist shall coordinate all monitoring and sampling activities with the safety officers for the contractors to ensure that proper safety regulations and protective measures meet compliance. In addition, close coordination shall be maintained with construction representatives to adequately inform personnel of the possibility that open archaeological units or trenches may occur in the project area.

7. As necessary, verbal and/or reports will be made to SHPD, and any other agencies as requested.

LABORATORY ANALYSIS

All artifacts and samples collected during the project (excluding human remains) shall be transported to the archaeological firm’s office/laboratory for analysis in accordance with HAR §13-279. They will be cleaned, sorted, counted, weighed (metric), and analyzed (both qualitative and quantitative data), with all data recorded on standard laboratory forms. Midden samples will be minimally identified to major class (e.g., bivalve, gastropod mollusk, echinoderm, fish, bird, and mammal). Digital photographs with scales will be taken of a representative sample of the diagnostic artifacts. Tables and text discussing the artifact and sample results will be provided in the report, along with appropriate digital photographs.

Samples (wood charcoal, shell, non-human bone, kukui nut) identified as potentially suitable for dating from an undisturbed context (e.g., cultural layer, pit feature) shall be considered for radiocarbon dating in consultation with SHPD and the landowner. Prior to submittal, potential wood charcoal samples shall first be submitted to International Archaeological Research Institute, Inc. (IARII) for wood taxa identification. Only samples identified as short-lived endemic or Polynesian-introduced species will be selected for dating purposes.
All stratigraphic profiles and plan view maps of identified historic properties (e.g., sites, cultural layers, features) shall be drafted for presentation in the final report. Photographs of project work, including overviews, and of individual profiles, cultural layers, and features shall also be included in the final report.

CURATION

The archaeological firm shall store all project documentation (field notes, photographs, profiles and plan view drawings, laboratory data, etc.) in their office/laboratory. They shall also store all collected artifacts and sample material until final disposition of the artifacts and samples is determined in consultation with SHPD and the landowner.

REPORTING

All historic properties (non-burial and burial) identified and/or further documented during archaeological monitoring (e.g., cultural layer, pit features, buried walls) shall be assessed for site significance per HAR §13-284-6, Criteria a through e. This information shall be included in the final report, along with appropriate recommendations for future mitigation.

An Archaeological Monitoring Report (AMR) meeting the requirements of HAR §13-279- 5 shall be submitted within 180 days of the completion of fieldwork. The final SHPD-accepted AMR shall be distributed to SHPD and the landowner.
REFERENCES CITED

Kingsbury, Nigel T. and Robert L. Spear

Medrano, Stephanie, Cathleen A. Dagher, Michael Dega, and Robert L. Spear.
October 6, 2017

Michael Stout, Project Manager
Aloha Solar Energy Fund II
2969 Mapunapuna Place, Suite 220
Honolulu, HI 96819
Email: MStout@nce.net

Dear Mr. Stout:

SUBJECT: Chapter 6E Historic Preservation Review –
Archaeological Monitoring Plan for the Proposed
Utility Corridor for the Kalaelo Solar Farm Project
Honouliuli Ahupua’a, ‘Ewa District, Island of O‘ahu
TMK: (1) 9-1-013:070 por. And Coral Sea Road Right-of-
Way

Thank you for the opportunity to review the draft plan titled Archaeological Monitoring Plan for the Proposed Solar Farm in Kalaelo, Honouliuli Ahupua’a, ‘Ewa District, Island of O‘ahu, Hawai‘i, TMK: (1) 9-1-013:070 por. And Coral Sea Road Right-of-Way (Kingsbury et al. September 2017). The State Historic Preservation Division (SHPD) received this submittal on September 19, 2017. The SHPD previously accepted additional survey work for the newly-added utility corridor work on September 11, 2017 (Log No. 2017.01876, Doc. No. 1709KM03).

The HCDA and the Aloha Solar Energy Fund II (ASEF) are the project proponents and the proposed project involves two components: installation of a photovoltaic utility farm within Parcel 070, and installation of a 12kV electrical line extending from Parcel 070 and into the Coral Sea Road Right-of-Way (CSR ROW). The first component, the solar farm within Parcel 070, includes 44.28 acres owned by the Hawaii Community Development Authority (HCDA) and the SHPD accepted the archaeological inventory survey (AIS) for that portion of project on February 25, 2014 (Log No. 2013.6641, 2014.00823, 2014.00528, Doc. No. 1402SL27). The second component, the 12kV electric line, includes 9400 linear feet with a portion of Parcel 070 and the CSR ROW owned by HDOT. Approximately 3800 ft. of the line will be underground while the remaining portions will be overhead lines. The 12kV line component includes approximately 18.32 acres and will be installed parallel to CSR and eventually connect to a conduit near Roosevelt Avenue and Renton Road.

The original AIS (Medrano et al. 2014) for Parcel 070 documented a total of 23 historic properties (Sites 50-80-12-7483 to 7494, 7496-7504, 5119, and 5120) and the addendum survey (Kingsbury and Spear 2017) identified no additional historic properties. Both surveys recommended the proposed project would have an effect on historic properties and provided mitigation recommendations that included preservation, data recovery, and archaeological monitoring. Furthermore, Kingsbury and Spear (2017) recommend that the 12kV portion also be covered under the archaeological monitoring program; however, the low potential to encounter historic properties warranted on-call monitoring.

Based on the above information, this archaeological monitoring plan (AMP) was prepared in support of the mitigation recommendations provided by Medrano et al. (2014) and Kingsbury and Spear (2017). The AMP was also prepared at the request of G70 on behalf of the HCDA and the ASEF. Due to the potential to encounter WWII era features, limestone walls and platforms, modified outcrops, and habitation sites.

A-14
The AMP stipulates the following:

- Pre-construction coordination briefing shall be conducted prior to construction activities to discuss the monitoring program provisions, project plans, and any interim measures;
- On-site archaeological monitoring for all project related ground disturbance;
- The archaeological monitor shall ensure that the interim protection measures are in place prior to project work and remain intact for the duration of project work;
- The archaeological monitor shall have the authority to temporarily halt all activity in the area in the event of a potential historic property being identified, or to record archaeological information for cultural deposits or features;
- In the event that non-burial historic properties are identified, the provisions outlined in HAR §13-279 will be followed and SHPD shall be notified of the find and consulted with regarding the treatment and documentation; and
- If human remains are identified, work will cease in the vicinity, SHPD will be notified, and compliance with procedures outlined in HAR §13-300-40 and SHPD directives shall be followed.

Documentation of non-burial cultural deposits will include recording stratigraphy using USDA soil descriptions, recordation of feature contents through excavation or sampling of features, representative scaled profile drawings, photo documentation, and appropriate laboratory analysis of collected samples and artifacts. Laboratory analysis may include but not be limited to wood taxa identification, radiocarbon dating, pollen analysis, invertebrate and vertebrate identification. Charcoal samples shall be submitted for wood taxa identification prior to radiocarbon dating. Final curation shall be determined in consultation with the SHPD and the landowner. Departure from these provisions shall occur only in consultation with and concurrence from SHPD.

The plan meets the minimum requirements of Hawaii Administrative Rules (HAR) §13-279-4. It is accepted. Please send one hardcopy of the document, clearly marked FINAL, along with a text-searchable PDF version to the Kapolei SHPD office, attention SHPD Library.

**SHPD requests to be notified at the start of archaeological monitoring.** Upon completion of archaeological monitoring fieldwork, SHPD looks forward to reviewing an archaeological monitoring report meeting the requirements of HAR §13-279-5.

Please contact Kimi Matsushima at (808) 692-8027 or at Kimi.R.Matsushima@hawaii.gov for questions regarding archaeological resources or this letter.

Aloha,

Susan A. Lebo, PhD
Archaeology Branch Chief

cc: Kawika McKeage, G70 (kawikam@e70.design)
Morgan Davis, SCS (morgand@scshawaii.com)
Nigel Kingsbury, SCS (nigel@scshawaii.com)
Tesla Malama, HCDA (tesha.malama@hawaii.gov)
October 6, 2017

Michael Stout, Project Manager
Aloha Solar Energy Fund II
2969 Mapunapuna Place, Suite 220
Honolulu, HI 96819
Email: MStout@ecc.net

Dear Mr. Stout:


Thank you for the opportunity to review the draft plan titled Archaeological Monitoring Plan for the Proposed Solar Farm in Kalaeloa, Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu, Hawai‘i, TMK: (1) 9-1-013:070 por. And Coral Sea Road Right-of-Way (Kingsbury et al. September 2017). The State Historic Preservation Division (SHPD) received this submittal on September 19, 2017. The SHPD previously accepted additional survey work for the newly-added utility corridor work on September 11, 2017 (Log No. 2017.01876, Doc. No. 1709KM03).

The HCDA and the Aloha Solar Energy Fund II (ASEF) are the project proponents and the proposed project involves two components: installation of a photovoltaic utility farm within Parcel 070, and installation of a 12kV electrical line extending from Parcel 070 and into the Coral Sea Road Right-of-Way (CSR ROW). The first component, the solar farm within Parcel 070, includes 44.28 acres owned by the Hawaii Community Development Authority (HCDA) and the SHPD accepted the archaeological inventory survey (AIS) for that portion of project on February 25, 2014 (Log No. 2013.6641, 2014.00823, 2014.00528; Doc. No. 1402SL27). The second component, the 12kV electric line, includes 9400 linear feet with a portion of Parcel 070 and the CSR ROW owned by HDOT. Approximately 3800 ft. of the line will be underground while the remaining portions will be overhead lines. The 12kV line component includes approximately 18.32 acres and will be installed parallel to CSR and eventually connect to a conduit near Roosevelt Avenue and Renton Road.

The original AIS (Medrano et al. 2014) for Parcel 070 documented a total of 23 historic properties (Sites 50-80-12-7483 to 7494, 7496-7504, 5119, and 5120) and the addendum survey (Kingsbury and Spear 2017) identified no additional historic properties. Both surveys recommended the proposed project would have an effect on historic properties and provided mitigation recommendations that included preservation, data recovery, and archaeological monitoring. Furthermore, Kingsbury and Spear (2017) recommend that the 12kV portion also be covered under the archaeological monitoring program; however, the low potential to encounter historic properties warranted on-call monitoring.

Based on the above information, this archaeological monitoring plan (AMP) was prepared in support of the mitigation recommendations provided by Medrano et al. (2014) and Kingsbury and Spear (2017). The AMP was also prepared at the request of G70 on behalf of the HCDA and the ASEF. Due to the potential to encounter WWII era features, limestone walls and platforms, modified outcrops, and habitation sites.
The AMP stipulates the following:

- Pre-construction coordination briefing shall be conducted prior to construction activities to discuss the monitoring program provisions, project plans, and any interim measures;
- On-site archaeological monitoring for all project related ground disturbance;
- The archaeological monitor shall ensure that the interim protection measures are in place prior to project work and remain intact for the duration of project work;
- The archaeological monitor shall have the authority to temporarily halt all activity in the area in the event of a potential historic property being identified, or to record archaeological information for cultural deposits or features;
- In the event that non-burial historic properties are identified, the provisions outlined in HAR §13-279 will be followed and SHPD shall be notified of the find and consulted with regarding the treatment and documentation; and
- If human remains are identified, work will cease in the vicinity, SHPD will be notified, and compliance with procedures outlined in HAR §13-300-40 and SHPD directives shall be followed.

Documentation of non-burial cultural deposits will include recording stratigraphy using USDA soil descriptions, recordation of feature contents through excavation or sampling of features, representative scaled profile drawings, photo documentation, and appropriate laboratory analysis of collected samples and artifacts. Laboratory analysis may include but not be limited to wood taxa identification, radiocarbon dating, pollen analysis, invertebrate and vertebrate identification. Charcoal samples shall be submitted for wood taxa identification prior to radiocarbon dating. Final curation shall be determined in consultation with the SHPD and the landowner. Departure from these provisions shall occur only in consultation with and concurrence from SHPD.

The plan meets the minimum requirements of Hawaii Administrative Rules (HAR) §13-279-4. It is accepted. Please send one hardcopy of the document, clearly marked FINAL, along with a text-searchable PDF version to the Kapolei SHPD office, attention SHPD Library.

**SHPD requests to be notified at the start of archaeological monitoring.** Upon completion of archaeological monitoring fieldwork, SHPD looks forward to reviewing an archaeological monitoring report meeting the requirements of HAR §13-279-5.

Please contact Kimi Matsushima at (808) 692-8027 or at Kimi.R.Matsushima@hawaii.gov for questions regarding archaeological resources or this letter.

Aloha,

Susan A. Lebo, PhD
Archaeology Branch Chief

cc: Kawika McKeague, G70 (kawikam@g70.design)
Morgan Davis, SCS (morgan@scshawaii.com)
Nigel Kingsbury, SCS (nigel@scshawaii.com)
Tesha Malama, HCDA (tesha.malama@hawaii.gov)