

Reviewed and Approved by Executive Director: DN

December 9, 2020

FOR INFORMATION

I. SUBJECT

Aloha Solar Energy Fund II (ASEF) Historic Property Preservation Plan Update

II. FACTS

On December 6, 2017, the Authority authorized the Executive Director or its Designee to execute a lease with ASEF to Develop a 5-Megawatt Photovoltaic Solar Farm (Project) on Parcel 13073-E, Tax Map Key (TMK) (1) 9-1-013: 070.

On March 13, 2018 at a decision making public hearing, the Authority approved ASEF's (1) Development Permit and (2) Request for Variances pertaining to height of fence, setback and landscaping requirements for the development of the Project on Parcel 13073-E, Tax Map Key (TMK) (1) 9-1-013: 070.

III. DISCUSSION AND/OR ANALYSIS

Since March 2020, ASEF has been operational at the facility generating power and transferring that power via the Coral Seas 12-kv line extension to the Hawaiian Electric Company (HECO).

As part of the project development permit decision and order, ASEF was required to (1) install a six foot high chain link perimeter fencing and landscaping, (2) protect and monitor historic property preservation area during construction; and (3) finalize the draft Historic Property Preservation Plan with State Historic Preservation Division's (SHPD) concurrence and present it back to the Hawaii Community Development Authority.

The fencing was completed in March 2019. The protection and monitoring of the historic property preservation area was completed by October 2019.

The final Historic Property Preservation Plan approved by the SHPD is being presented today.

Attachments:

Exhibit A - Power Point Presentation

Exhibit B - Preservation Plan

Prepared By: Tesha Malama, Kalaeloa Planning and Development Director THM

Reviewed By: Deepak Neupane, P.E., AIA, Executive Director DN

ARCHAEOLOGICAL PRESERVATION PLAN

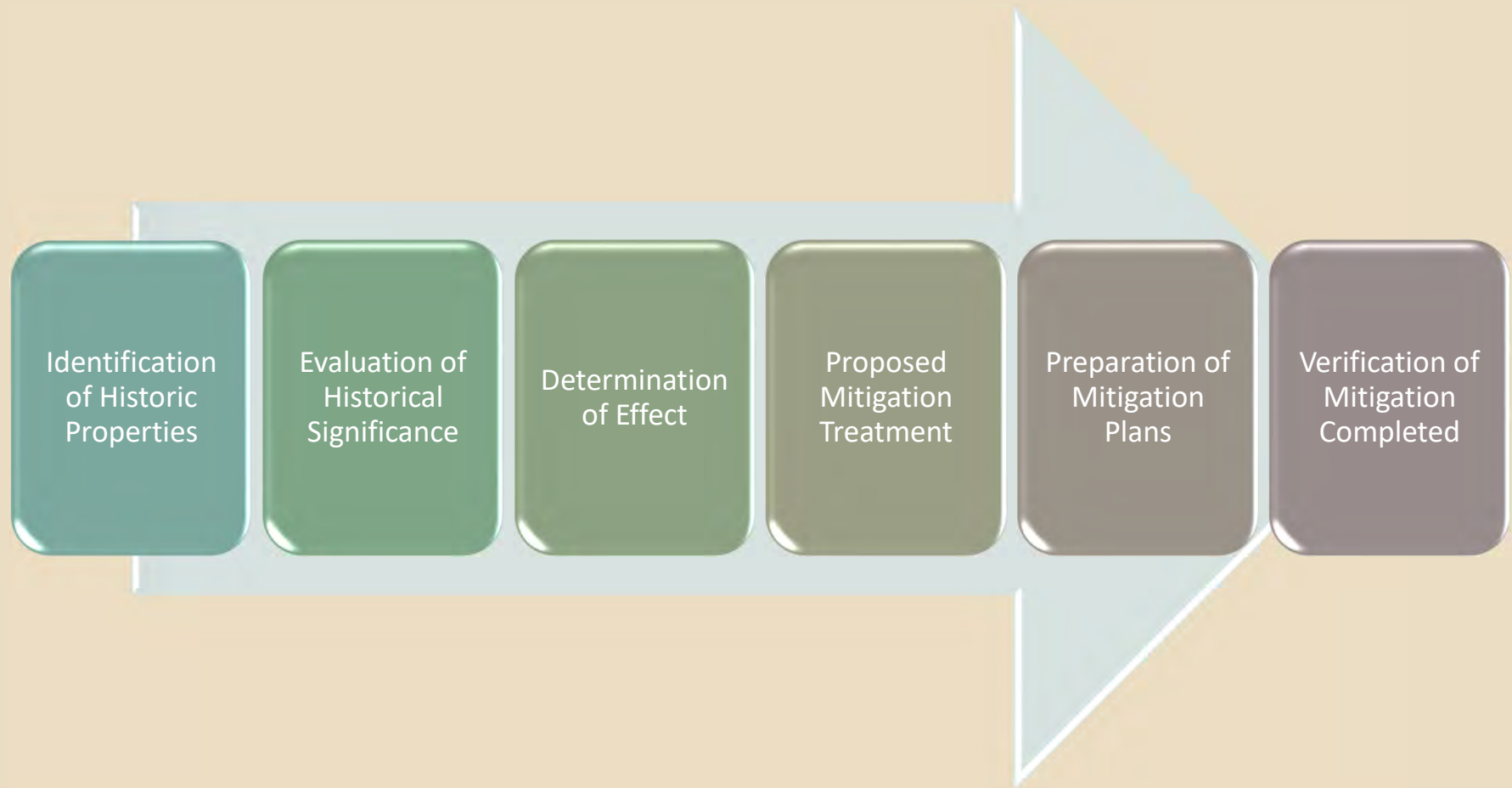
ALOHA SOLAR ENERGY FUND II (ASEF)
KALAELOA, HONOULIULI, 'EWA, O'AHU
TMK 9-1-013:070

HCDA BOARD MEETING
DECEMBER 9, 2020





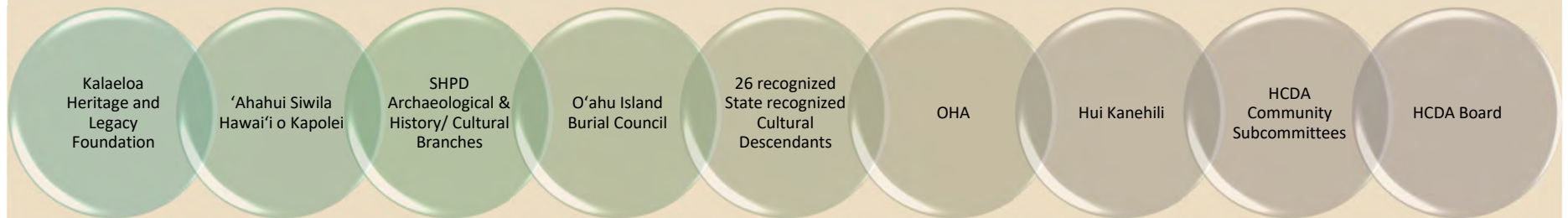
HRS 6E HISTORIC PRESERVATION REVIEW



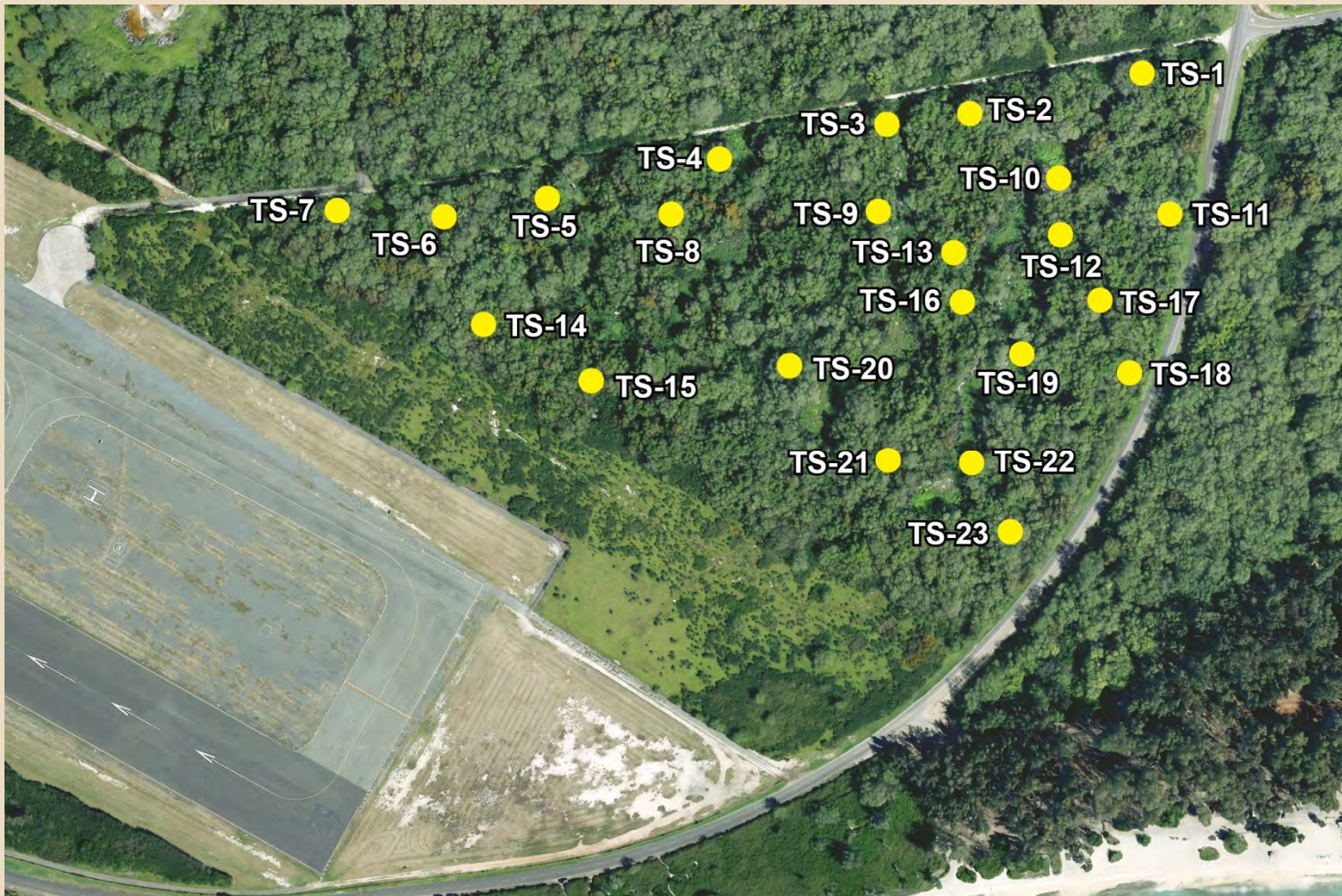
ARCHAEOLOGICAL RESOURCE MANAGEMENT 2012-2020



CONSULTED PARTIES 2012-2020



AIS DISTRIBUTION OF SITES



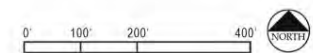
RELATIONSHIP OF SITES TO PROPOSED ASEF II FOOTPRINT

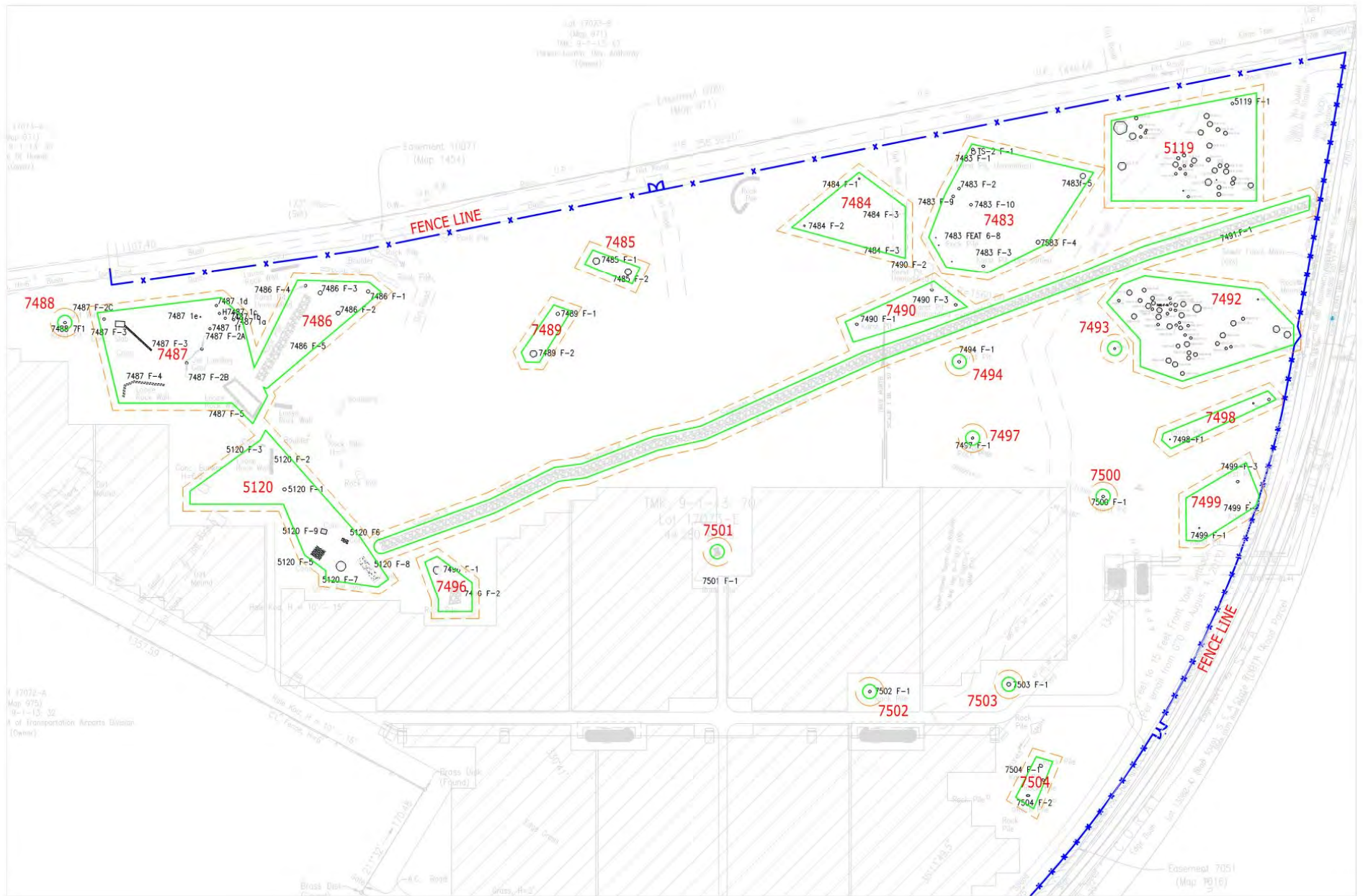


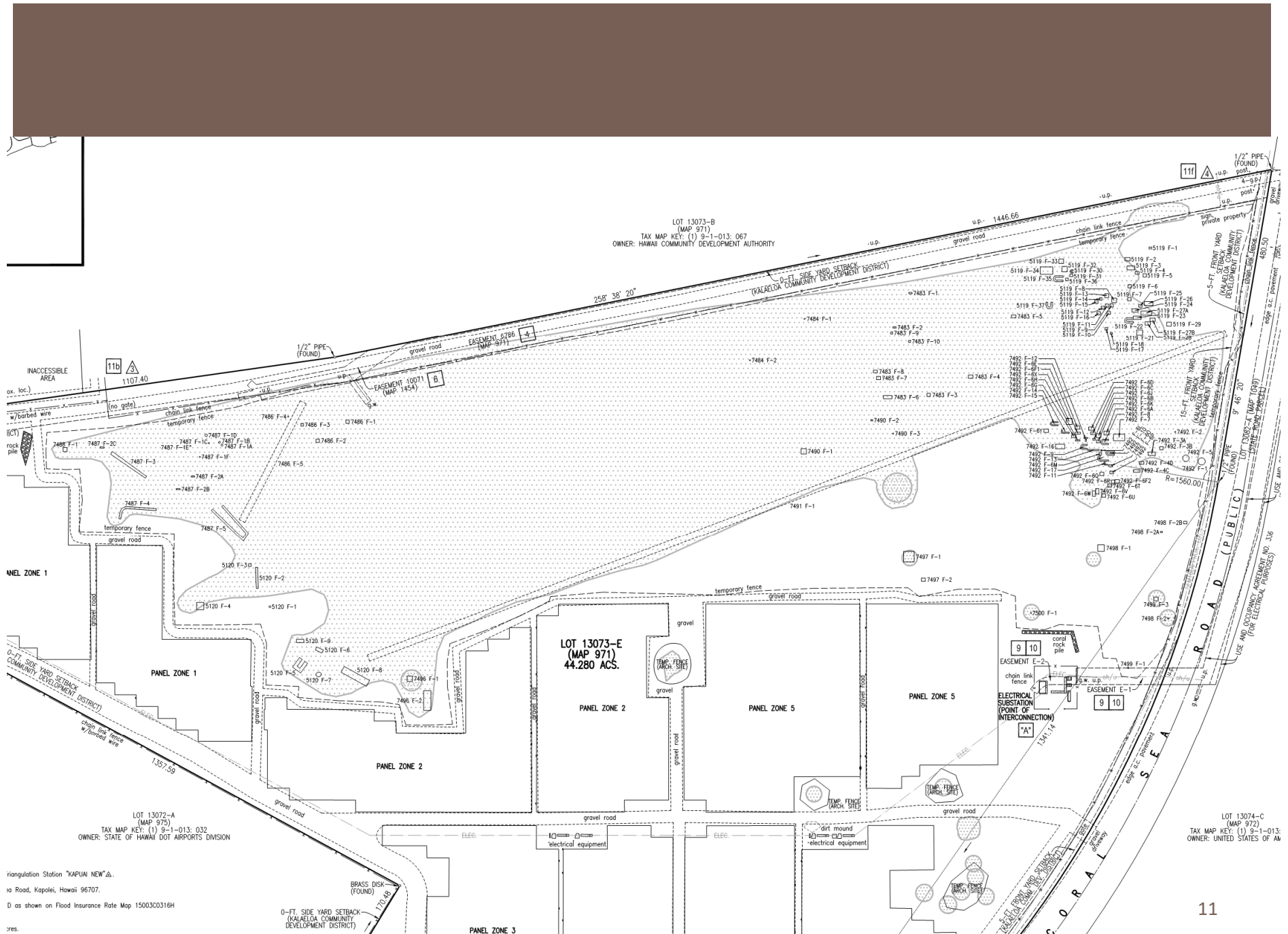


LEGEND

- Proposed Buffered Archaeological Preserve
- Archaeological trail with buffer
- PV Panels
- Special Management Area







INTERIM BUFFER ZONES

All sites identified within TMK: (1) 9-1-013:070 shall have a minimum permanent buffer zone of 10 feet from the edge of each feature outward in all directions. An additional 10-foot interim buffer will be added during all construction activities. This additional buffer will ensure each feature is a minimum of 20 feet from construction activities. Site #-7501 Feature 1, shall have a 10-foot permanent buffer and an additional 7 foot interim buffer. This additional buffer will ensure that Site # 7501 Feature 1 will be 17 feet from any construction activities.

The buffer zones will be surveyed, added to all construction plans prior to construction activities, and non-biodegradable survey pins shall be inserted into the ground along the exterior boundary of the buffer zone at appropriate intervals. Inspection of the survey pins and buffer zones shall also be inspected regularly in order to ensure the integrity of the interim buffer zone.

INTERIM SITE PRESERVATION

Pursuant to the DLNR § 13-277 Hawaii Administrative Rules, preservation of the 23 sites and 146 associated features listed above will take the form of avoidance and protection, also referred to as *conservation*. It is proposed herein that these existing sites and features will be left in place and afforded an interim buffer zone demarcated by yellow construction tape, erected 20 feet from the archaeological features. The interim preserve area will consist of a single large preserve in the northern portion of the parcel (including the burial mound locations) and eight smaller landlocked preserve areas. This “archaeological preserve” will afford full protection of the historic properties. The following sections outline the necessary interim preservation measures that will apply.

INTERIM PROTECTION MEASURES

Interim protection measures outlined here are applicable to all sites and features to be preserved within TMK: (1) 9-1-013:070. The interim protection measures will be implemented prior to any form of ground disturbing activities and verification shall be presented to the SHPD prior to any work being performed within TMK: (1) 9-1-013:070 is performed. All monitoring conventions as outlined in the SHPD approved AMP (Kingsbury et al. 2017B) shall be followed. Additionally, the following interim protection measures shall be followed.

1. No work shall be initiated within TMK: (1) 9-1-013:070 prior to informing SHPD of the projects scope and site plans showing proximity to the interim buffer zone as described here.
2. Prior to the initiation of any and all work associated with the project an archaeologist shall inspect and record that all interim preservation measures are in place. The archaeologist shall submit a brief document to the SHPD verifying that all interim preservation measures are in place prior to the initiation of work on site.
3. Under the projects, SHPD approved (Kingsbury et al. 2017B), AMP the archaeological monitor shall ensure that the interim protection measures are in place throughout the duration of the project. ASEF II Site Supervisor to inspect interim protection measures in addition to the archaeological monitor.
4. Additionally, all land altering work within TMK: (1) 9-1-013:070 parcel shall be subject to archaeological monitoring. Furthermore, there will be no work within the interim buffer zone. All work outside of the interim buffer shall be monitored by an archaeologist.
5. The preserve portions of TMK: (1) 9-1-013:070, containing the sites and associated features stipulated within this document, shall be cordoned off from the area planned for development by yellow caution tape. This will be accomplished under the supervision of a qualified archaeologist and recorded by a surveyor.
6. Within the preserve boundaries, no stones whether stacked, piled, or strewn about shall be moved, lifted, pushed, or affected in anyway.
7. The caution tape barrier shall consist of two rows of caution tape an upper alignment will be 5 feet off the ground and a lower one at 3 feet off the ground.
8. This caution tape barrier shall be placed 20 feet away (toward the proposed project area) from all sites and associated features to effectively establish a 20-foot interim buffer zone. Except for Site #-7501 Feature 1 which will have a caution tape barrier 17 feet away (toward the proposed project area), effectively establishing a 17 foot buffer between the feature and the construction activities.
9. Access to the interim preservation area will be strictly off limits to machinery, ground disturbance, and most construction related individuals.
10. The interim preserve is off limits as a storage area for construction materials, machines, parking, or personnel.
11. Individuals allowed in to the interim preserve area include recognized cultural descendants, archaeologist, the landowner (HCDA representative), ASEF II project management, and those assigned to clear the interim preserve of modern trash that may enter, via wind or water, the interim preserve area during the construction related activities. Construction personnel required to construct the pathway to the preserve area or firebreak may enter the preserve area when accompanied by a qualified archaeological monitor.

12. If vegetation clearing within the interim preserve area is deemed necessary to avoid site and or feature destruction then the SHPD shall be notified in writing of the planned vegetation clearing, how the work is to be accomplished, who is to perform the work, and photographs documenting the vegetation and proximity to sites and or features shall be included. SHPD shall determine the appropriate mitigation measures.
13. If an act of nature (earthquake, tsunami, or fire) were to damage the sites or features SHPD shall be notified of the damages to the sites and associated features.
14. A botanical specialist shall be contracted for the portion of the project to be developed. The botanical specialist will be contracted with the taking of cuttings or seeds from culturally important plants for use either on property or propagate for future use in the Kalaeloa region.

§13-277-3 Preservation plan. A preservation plan prepared pursuant to chapters 13-275 or 13-284, shall:

- (1) Identify for each significant historic property which forms of preservation will be implemented: avoidance and protection (conservation), stabilization, rehabilitation, restoration, reconstruction, interpretation, or appropriate cultural use;
- (2) Specify the buffer zones around each significant historic property and depict them on a map of sufficient scale;
- (3) Specify short-term protection measures for each significant historic property that will be within or near a construction area;
- (4) Discuss the agency or person's consultation process for historic properties deemed significant under paragraphs 13-275-6(b)(5) or 13-284-6(b)(5). The agency or person shall consult with ethnic organizations and individuals for whom the historic properties are of significance. The comments on preservation treatment expressed by these individuals or organizations shall be considered when preparing the preservation plan. The plan shall include a list of individuals and organizations consulted, and shall summarize their input.
- (5) Specify the long term preservation measures to be undertaken at each significant historic property. [Eff. ~~11/1/2003~~ 11/1/2003] (Auth: HRS §6E-3) (Imp: HRS §§6E-1, 6E-3, 6E-7, 6E-8, 6E-42)

DEC 11 2003] (Auth: HRS §6E-3) (Imp:
HRS §§6E-3, 6E-7, 6E-8, 6E-42)

§13-277-6 Long term preservation measures. Long term preservation measures shall follow the appropriate Secretary of the Interior's Standards for Historic Preservation Projects. The preservation plan shall address the following long term preservation measures:

- (1) Maintenance measures to be followed;
- (2) Methods for clearing vegetation;
- (3) The manner in which litter is controlled;
- (4) Access to the site and possible use of the site for cultural practices, if appropriate;
- (5) Approaches to interpret and inform the public about the site, if appropriate;
- (6) Permanent marked markers, if appropriate;
- (7) If appropriate, provisions to address potential future impacts and site stability; and
- (8) Provisions for reasonable monitoring of site integrity by the person or agency, and SHPD inspection to assure compliance.

[Eff DEC 11 2003] (Auth: HRS §6E-3)
(Imp: HRS §§6E-3, 6E-7, 6E-8, 6E-42)

§13-277-7 Interpretation requirements. (a) When using interpretive text for signs, brochures, etc., the text shall be reviewed and approved by SHPD.

- (b) Interpretive signs shall be:
 - (1) Of sufficient quality to enhance public understanding of the site;
 - (2) Culturally sensitive, based on consultation with appropriate organizations and individuals; and

HAR 13-277

(3) Located so as not to adversely affect the site visually.

(c) Any data recovery work to improve the interpretation of the site shall meet the standards set forth in chapter 13-278. [Eff DEC 1 1 2003]
(Auth: HRS §§6E-1, 6E-3, 6E-7, 6E-8, 6E-42) (Imp: HRS §§6E-3, 6E-7, 6E-8, 6E-42)

§13-277-8 Penalty. Non-compliance with the provisions and procedures established by this chapter may result in a directive to the person not to proceed with construction in the project area, a denial or revocation of SHPD's written concurrence or agreement, and penalties as provided in section 6E-11, HRS, chapters 13-275, 13-278, 13-281, 13-282, 13-284, HAR, and applicable laws. [Eff DEC 1 1 2003] (Auth: HRS §6E-3) (Imp: HRS §§6E-1, 6E-3, 6E-8, 6E-42)

HAR 13-277

ASEF II: AS-BUILT



ASEF II: AS-BUILT



IPP: SNOW FENCING 10' AND 20'



PRESERVATION: PERIMETER FENCE



PRESERVATION: PERIMETER FENCE



PRESERVATION: BUFFER ZONE



PRESERVATION: BUFFER ZONE



PRESERVATION: MAINTAIN DISTANCE & CLEARING





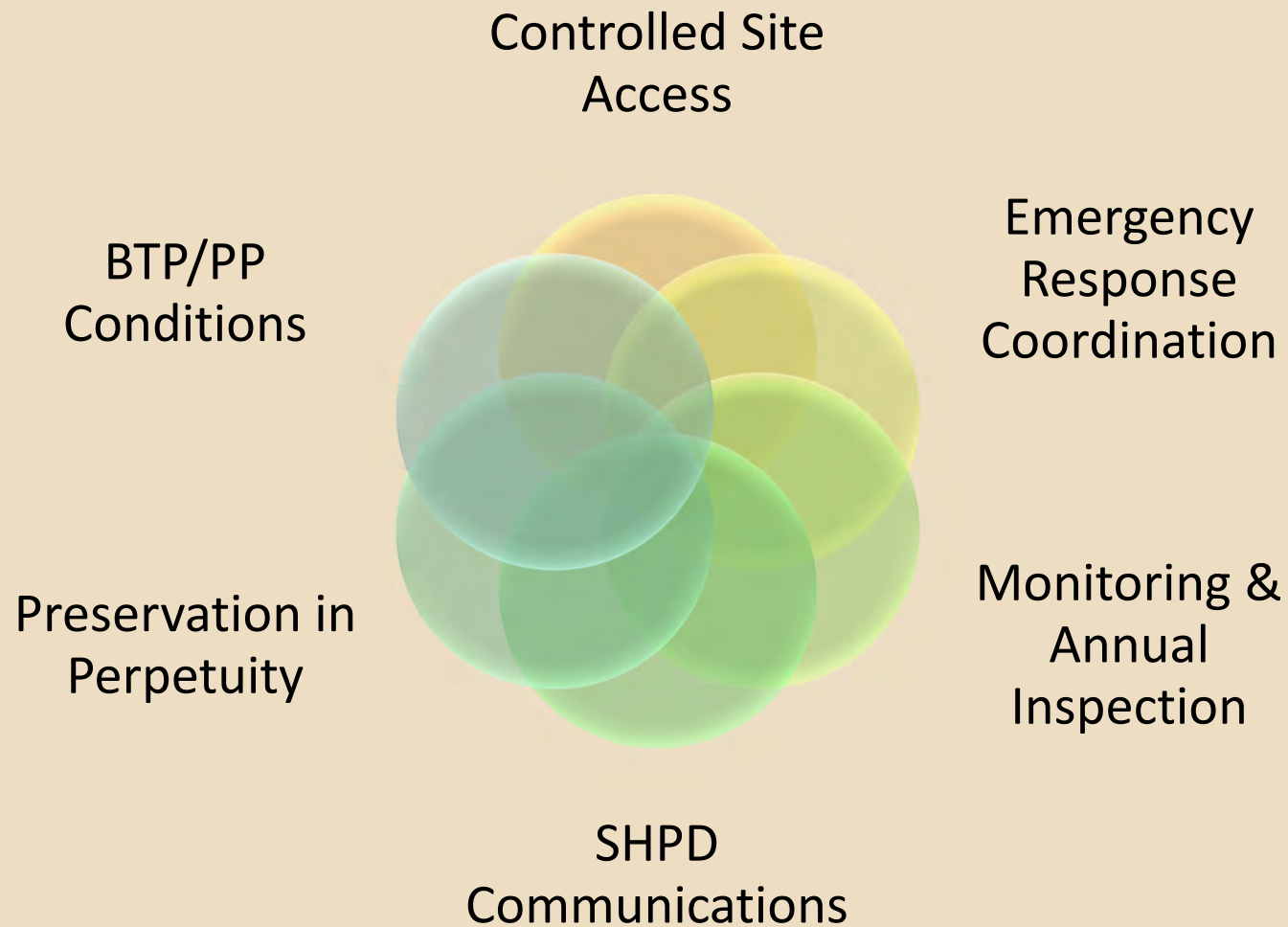
PRESERVATION:
LANDSCAPING

PRESERVATION: CARE OF WAHI KANU



ARCHEOLOGICAL SITES. (a) **Recognized Cultural Descendants' Access to Burial Sites.** Subject to approval by the Lessor and SHPD and with one week's written advance notice to Lessee, Lessee shall ensure that all recognized cultural descendants (as defined in the Hawaii Administrative Rules, Section 13-300-2, and as further described in the SHPD documents identified in Schedule B attached hereto and made a part hereof (collectively, the "Archaeological Studies")) are permitted entry and access to the burial sites located on the Property during normal work hours, in accordance with the SHPD requirements as approved and set forth in the Archaeological Studies identified on Schedule B. Entrants will be required to follow Lessee's safety procedures to include the use of appropriate and required personal protective equipment. (b) **Construction and Other Activities by Lessee on the Premises.** Lessee shall be responsible for monitoring access to and from the Premises by Lessee or Lessee's agents, all construction activities, operation and maintenance of Lessee's Solar Project and other activities occurring on the Premises in order to ensure preservation and protection in place of the Archaeological Sites on the Property, and implementing appropriate monitoring, mitigation and preventive measures consistent with the SHPD requirements, as approved in the Archaeological Studies identified on Schedule B. (c) **Historic Preservation.** In the event any new historic properties or burial sites in addition to those identified in the Archaeological Studies identified on Schedule B, are found on the Premises, Lessee shall immediately stop all land utilization or work or both in the immediate vicinity of the find and contact the Lessor and SHPD. Lessee assumes the risk of any such sites of archaeological significance, or prehistoric or historic remains found on the Premises, including the risk of any delays arising out of the investigation, protection, or removal of such sites or remains. Lessee shall, at all times during the Term, comply fully with all Applicable Laws and regulations with respect to all prehistoric or historic remains or sites of archaeological significance present or discovered at the Premises.

FINAL PRESERVATION PLAN



** Future amendment could be warranted if area conditions change over time*

**PRESERVATION PLAN FOR
MULTIPLE SITES ON HCDA-OWNED PARCEL IN KALAELOA
HONOLULU AHUPUA`A, `EWA DISTRICT,
ISLAND OF O`AHU, HAWAII
TMK: (1) 9-1-013:070**

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DECEMBER 2020

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INTRODUCTION

At the request of Aloha Solar Energy Fund, LLC. (ASEF), Scientific Consultant Services, Inc. (SCS) has prepared this Preservation Plan (IPP) for a 5.0-megawatt (AC) solar farm power facility in Kalaeloa, Honouliuli Ahupua'a, 'Ewa District, O'ahu Island, Hawai'i [TMK: (1) 9-1-013:070] (Figures 1-3). The solar farm encompasses approximately 22 acres of the approximately 44-acres parcel. The landowner is the Hawai'i Community Development Authority (HCDA).

The project proponents are Aloha Solar Energy Fund, LLC., and HCDA. The project involved the installation of approximately 23,500, 72-cell PV modules mounted on elevated galvanized steel racks mounted to posts, on approximately 22 acres. Power is transferred from the modules to five inverters and transformers to a switchyard connected to HECO's system. The remaining portion of the parcel will be dedicated as an archaeological preserve.

The preservation areas are located within portions of the parcel previously subjected to an Archaeological Inventory Survey (AIS) by SCS in 2013 (Medrano et al. 2014) and accepted by the State Historic Preservation Division (SHPD) on February 25, 2014 (Log No:2013.6641, 2014.00823, 2014.00528; Doc No:1402SL27, this SHPD letter is included in Appendix A). The AIS was conducted to identify and document historical properties, to assess their historical significance for eligibility for listing on the Hawaii Register of Historic Places, to make project effect recommendations, and to make mitigation recommendations.

The AIS led to the documentation of a total twenty-three historic properties (State Sites 50-80-12-5119, -5120 and 50-80-12-7483 through 50-80-12-7504) comprised of 146 features. Based on feature type, construction methods, and construction materials, State Site -5119, -7483 through -7485, -7487 (Features 1 and 4), -7488 through -7494, -5120 (Features 1 and 2), and -7496 through -7504 were interpreted to be associated with the pre - and/or post-Contact Period. State Sites 50-80-12-7486 (Feature 5) and 50-80-12-7491 were interpreted as trails associated with the pre-and/or post-Contact Period, with use possibly extending into the Historic Ranching Period. State Site 50-80-12-7487 (Feature 3 and 5) and State Site 50-80-12-5120 (Features 3 through 9) were interpreted to be associated with United States military occupation of the area during WWII. These 23 sites will be preserved within one large preservation area in the northern portion of the parcel and three smaller landlocked preserve areas. This "archaeological preserve" will afford full protection of the 23 sites documented within TMK: (1) 9-1-013:070.

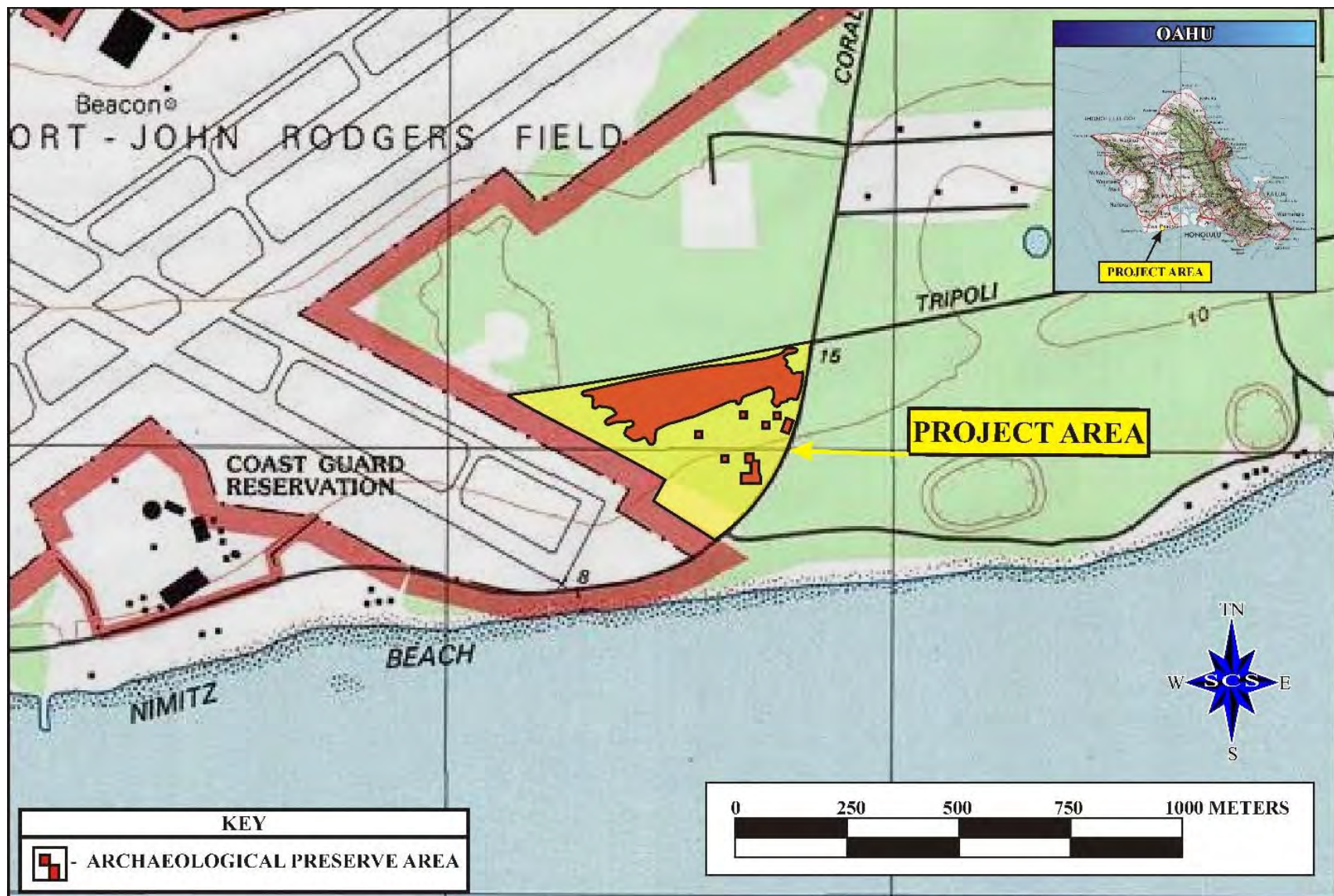


Figure 1: 1983 USGS 7.5' Ewa Quadrangle Map showing approximate location of the interim preservation areas in orange.

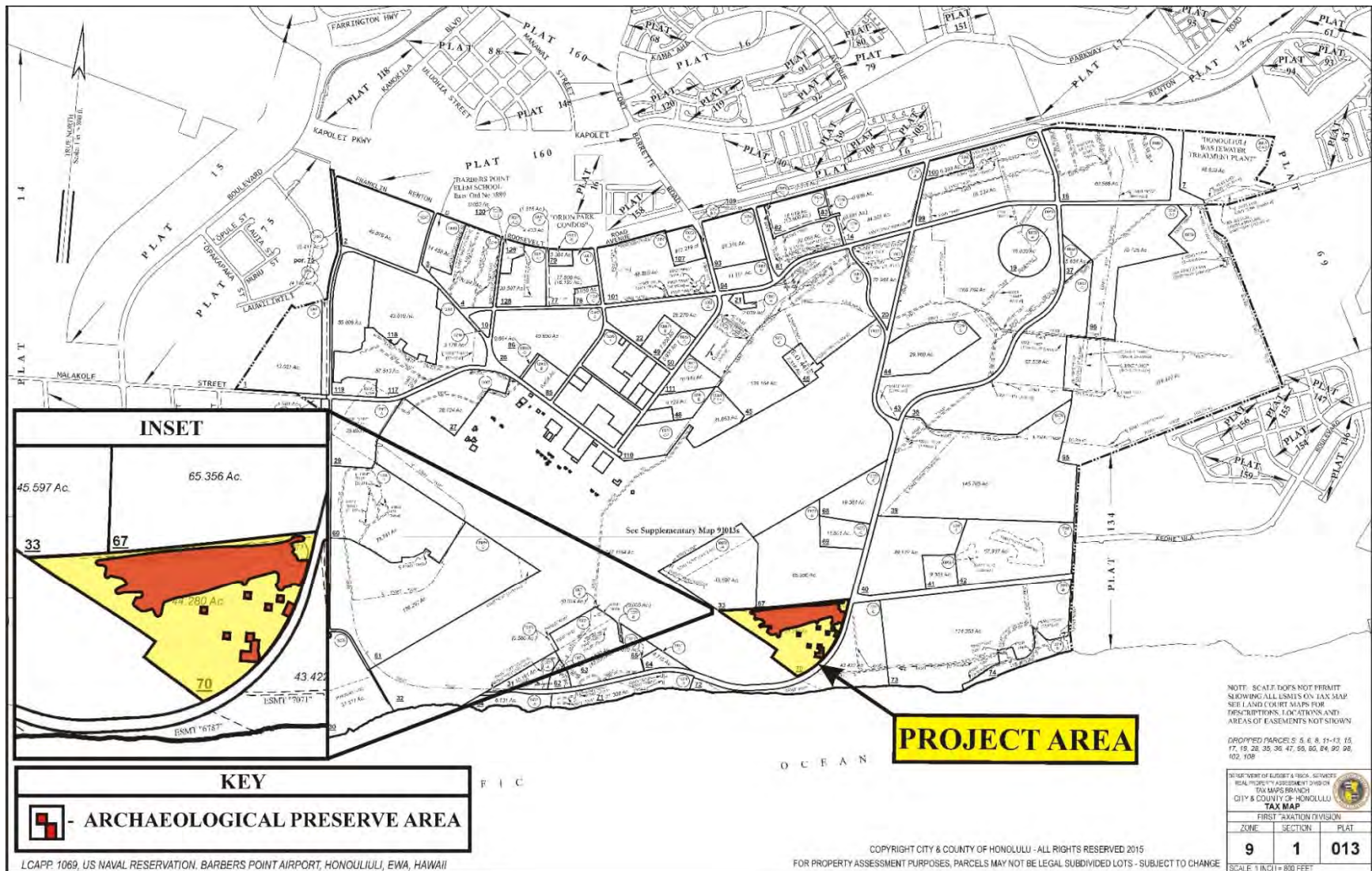


Figure 2: Tax Map Key (1) 9-1-013 showing approximate location of the interim preservation areas in orange.

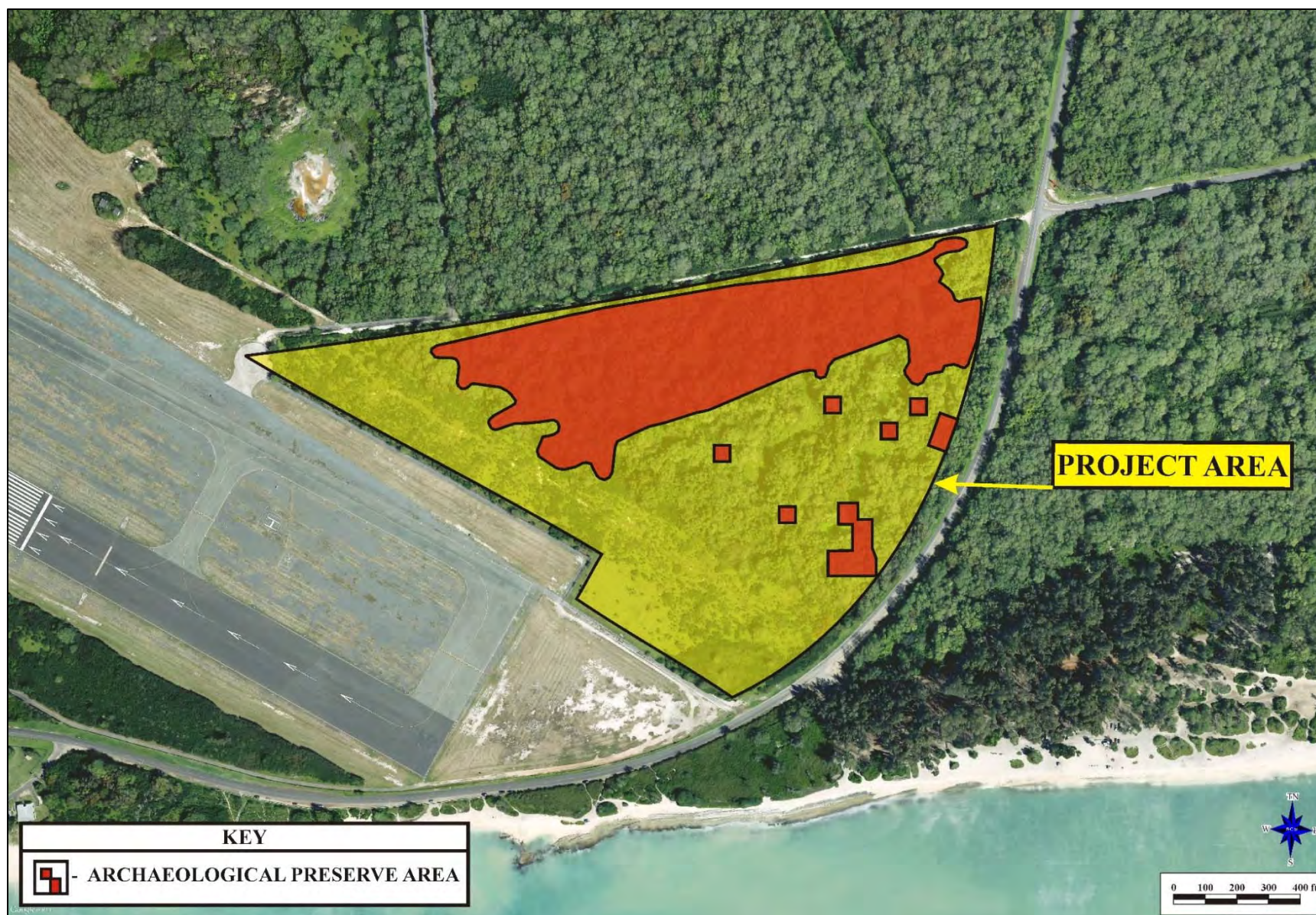


Figure 3:2013 Google Earth Aerial Image showing approximate location of the interim preservation areas in orange.

Kingsbury and Spear (2017 A) completed a Literature Review and Field Inspection (LRFI) for the Coral Sea Road Right-of-Way (CSRROW) portion of the project area. The LRFI recommendations for an AIS for the CSRROW was concurred by the SHPD in a letter dated May 29, 2017 (Log No.:2017.00844, Doc. No.:1705KM06), the letter is included in Appendix A.

Kingsbury and Spear (2017 B) completed an Addendum Archaeological Assessment (AAA) for the Coral Sea Road Right-of-Way (CSRROW) portion of the project area. The AAA consisted of 100 percent pedestrian survey and limited subsurface testing (6 stratigraphic trenches). The AAA resulted in no historic properties identified. The AAA was accepted by the SHPD in a letter dated September 11, 2017 (Log. No.:2017.01876, Doc.:1709KM03).

Kingsbury et al. (2017 A) completed a Burial Treatment Plan (BTP) for two burial mounds located in the northern portion of TMK: (1) 9-1-013:070 that specified the burial mounds are to be preserved within the larger archaeological preserve. On October 25, 2017, the O‘ahu Island Burial Council (OIBC) determined that the burials be preserved in place, and recommended that the SHPD accept the Draft BTP. The BTP was accepted by the SHPD in a letter dated December 18, 2017 (Log No.:2017.02484, Doc. No.:1712RKH03), the letter is included in Appendix A. .

As part of the agreed upon project mitigation requirements to modify the 2014 mitigation commitments SCS completed a Conditions Assessment, Kingsbury and Spear (2017), of all 23 sites and the corresponding 146 component features. This assessment consisted of site and component feature re-location, vegetation clearing, visual inspection of each individual feature, and photographing each feature. The field inspection did not find any significant alterations or disturbance to the 146 previously identified features. However, one feature, Site # -7487 Feature 2c, a wing portion of a crashed F-4 Phantom jet was observed as turned over. The Conditions Assessment is currently in review at the SHPD.

Kingsbury et al. (2017 B) completed an Archaeological Monitoring Plan (AMP) for the construction of the proposed 5.0-megawatt Solar Farm. The AMP was accepted by the SHPD in a letter dated October 6, 2017 (Log No.:2017.01876, Doc. No.:1710KM03), the letter is included in Appendix A.

The SHPD concurred with the 2-step verification process for the ASEF II, LLC Solar Farm Project in a letter dated October 12, 2017 (Log No.:2017.02244, Doc. No.:1710KM07). The letter states:

The SHPD concurs that to complete Step 6 of the historic preservation review process, HCDA and ASEF shall implement the accelerated 2-step process and provide Items 1 [interim protection plan] and 2 [final preservation plan, burial site component of a preservation and archaeological monitoring report] listed above under (6) Verification of Completion [Log No.:2017.02244, Doc. No.:1710KM07 see Appendix A.].

An interim preservation plan was prepared pursuant to HAR §13-275 and in compliance with HAR§ 13-277. This interim preservation plan was part of the 2-step verification process outlined in HAR § 13-275-9 (d), with a finalized preservation plan to be submitted upon project completion.

Preservation means the mitigation form in which a historic property is preserved. There are four steps to preserving a site per Hawaii Administrative Rules (HAR) HAR §13-277 and HAR §13-275, the first of which is presented here: preparation of a Preservation Plan. The following three steps include review and approval of the Preservation Plan by the SHPD, execution of the Preservation Plan, and verification by SHPD that the plan has been successfully executed. This Preservation Plan provides a brief background to the archaeology of the parcel (from Medrano et al. 2014), discusses preservation procedures pertaining to the 23 SIHP sites in the project area and enumerates the methods to be utilized for preservation.

SUMMARY OF ARCHAEOLOGICAL INVENTORY SURVEY

In 2014, SCS conducted an Archaeological Inventory Survey within the entire parcel of TMK: (1) 9-1-013:070 including the current project area (Medrano et al. 2014). The AIS resulted in the identification of twenty-three archaeological sites (State Sites 50-80-12-5119, and -5120, and 50-80-12-7483 through -7494, and 50-80-12-7496 through -7504, comprised of 146 features (see Figure 4). Based on feature type, construction methods, and construction materials, Sites -5119, -7483 through -7485, -7487 (Features 1 and 4), -7488 through -7494, -5120 (Features 1 and 2), and -7496 through -7504 were interpreted to be associated with the pre- and /or post-Contact Period. Based on a 1928 aerial coastal photo, a 1927 USGS quadrangle (Barber's Point) map, general feature horizontal shape, and feature location within the preservation area, State Sites 50-80-12-7486 (Feature 5) and 50-80-12-7491 were interpreted as trails associated with the pre- and/or post-Contact Period, with use possibly extending into the Historic Ranching Period. State Sites 50-80-12-7487 (Feature 3 and 5) and -5120 (Features 3 through 9) were interpreted to be associated with United States Military occupation of the area during the Historic Period. Based on feature type, construction methods, construction materials, and observed artifacts, Site -5119, Feature 30 was interpreted as having associations with Traditional Hawaiian and historic (military) occupation of the interim preservation areas.

All sites were evaluated for significance, as outlined in Hawai'i Administrative Rules §13-275-6 and found to be significant under Criterion d, with Site -7483 (Feature 4) and Site -7486 (Feature 2) also being assessed as Significant under Criterion "e" due to the potential presence of a burial. A variety of site types were documented during the study. The majority of the features recorded represent Traditional Hawaiian occupation of the area. These features include rock mounds, various small enclosures and structures, modified pits (karst), unmodified pits (karst), platforms, and small coastal trails. Most of the sites were composed of limestone, a locally available resource. They represent a range of features often associated with residential complexes. Military use of the landscape was also well-represented, as evidenced by a concrete building foundation, a pillbox, and a guard shack.

The parcel containing the current project area was initially surveyed in 1984 and 1985 (Haun 1991). The surveyed parcel was designated as area E6 and no sites were reported. Two sites (State Sites -5119 and -5120) were recorded on the parcel during an Archaeological Inventory Survey, Phase II in 1996 (Wickler and Tuggle 1997). State Site -5119 was identified as an agricultural complex consisting of seven features. During the AIS (Medrano et al. 2014), this site was relocated and described as containing thirty-seven features, including rock mounds, C-shaped

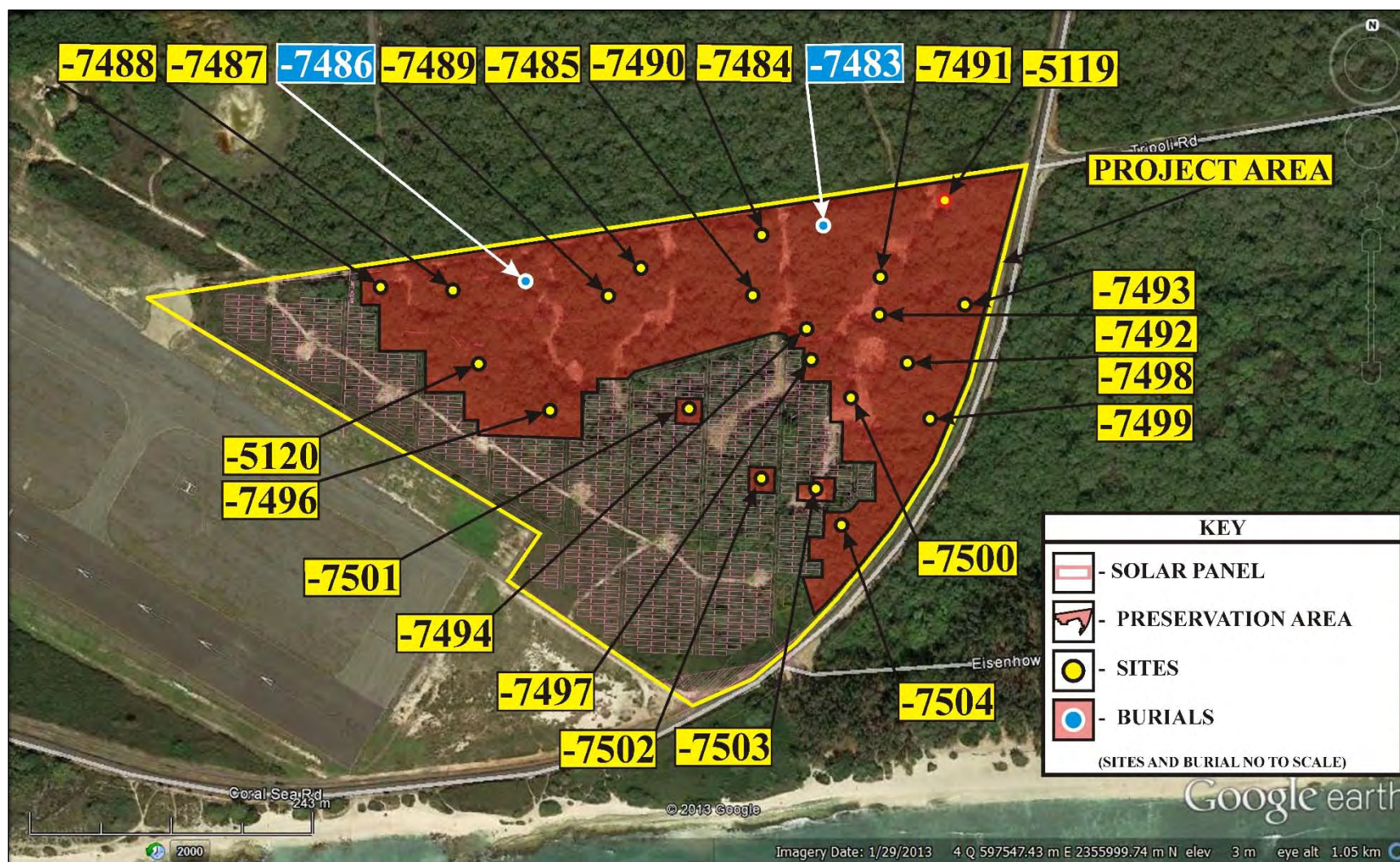


Figure 4: 1983 USGS 7.5 Quadrangle Map showing site distribution in the interim preservation areas.

structures, and unmodified pits. However, since Tuggle and Tomonari-Tuggle (1994; Task 1b) Wickler and Tuggle (1997; Part II: Phase II) did not provide plan view maps showing State Site 50-80-12-5119's feature spatial relationships, the AIS could not confirm which features were previously recorded.

State Site 50-80-12-5120 was identified in an area designated E6c during a Phase I AIS in 1994 (Tuggle and Tomonari-Tuggle 1997; Wicker and Tuggle 1997). According to the Wickler and Tuggle (1997) Phase II work, State Site 50-80-12-5120 was identified as a large stone wall (Feature A), a small concrete slab (Feature B), a limestone cobble platform (Feature C), a long narrow paved structure (Feature D), remnants of a jet aircraft crash (Feature E), anti-aircraft complexes (Features F, H and J), a coral packed road (Feature G), and a portable concrete pillbox (Feature I). Feature B of State Site -5120 (small concrete slab) represents the current State Site -5120, Feature 3 (concrete pad). Feature D of State Site -5120 (long narrow paved structure) may represent the current State Site -7486, Feature 5 (coastal trail). According to Wicker and Tuggle (1997), this feature may be a remnant of a sisal wall; however, the original function of this feature was found to be undetermined. Feature E of State Site -5120 (was found to be of a jet aircraft) represents the current State Site -7487, Feature 2 A through 2C (Aircraft Crash Site). Features F, H and J (was found to be of anti-aircraft complexes) represents the current State Site -5120, Feature 4 (guard shack), Feature 5 (Concrete Enclosure), possibly Feature 6 (remnant concrete structure), and Feature 8 (cluster of remnant concrete structures). Feature I of State Site -5120 (portable concrete pillbox) represents the current State Site -5120, Feature 7 (pillbox).

Although ten archaeological surface features were recorded during the Wicker and Tuggle (1997) Phase II work on Site -5120, only seven features (Features A, B, E, F, H, I, and J) were re-located during the AIS (Medrano et al. 2014). Wicker and Tuggle (1997) Site -5120 Features C, D, and G could not be re-located due to non-matching comparisons (*i.e.*, feature location, feature horizontal shape, and feature horizontal long axis orientation) between the Medrano et al (2014) archaeological inventory survey results and the Wickler and Tuggle (1997) site plan view map. It is suspected that Feature G, a coral packed road recorded by Wickler and Tuggle (1997), had been covered by vegetation growth. Overall, a variety of site types were documented during the Medrano et al. (2014) study. The majority of the features recorded represent pre- and/or Post-Contact occupation of the area. These features include rock mounds, various small enclosures and structures, modified pits (karst), unmodified pits (karst), platforms, and small coastal trails. Historic era sites from the 1940s-1960s were also recorded. The site and component feature numbers within the interim preservation areas have been expanded significantly due to the AIS (Medrano et al. 2014).

FEATURE TYPES LOCATED DURING INVENTORY SURVEY

Based on previous archaeological work on Naval Air Station Barbers Point and institutional knowledge, a discussion of feature types occurring in the `Ewa Plain is presented. This analysis of site types and discussion of such is treated both as a synthesis of previous work conducted in the area (see above) and the academic work of Scientific Consultant Services, Inc., in the area. References to specific site types are presented above.

ENCLOSURES AND PLATFORMS

Numerous stone-walled enclosures representing habitation loci proliferate in this inland zone beyond the coast where the soil mantle is shallow and deposits are most accurately assessed by their horizontal context rather than their vertical context. Features in this near-coastal zone consist of two common structural classes: platforms and mounds. Platforms are perhaps the vaguest of features in the `Ewa Plain, a characteristic not common to the feature type in other parts of the islands. The low, small, and poorly constructed platforms are so impecunious that Davis (1986) even suggested these platforms to be possible pavings. Typically associated with a habitation function, free-standing platforms are basically unknown in the area and no large, well-constructed platforms typically associated with ceremonial or larger habitation dwellings have been recently documented in the `Ewa Plain (Tuggle and Tomonari-Tuggle 1997:64). Both C-shapes and small rectangular enclosures are thought to have been the primary habitation loci on the `Ewa Plain. No house platforms have been documented to date. The rectangular house features themselves are typically small, with only modest quantities of artifacts and midden having been recovered from the features. This pattern is one that intimates limited feature occupational duration. Again, the question of permanent residences (and when) versus temporary/seasonal habitation loci emerges.

MOUNDS

Mounds are only slightly less ambiguous, with most researchers prescribing an agricultural function to these features. Sweet potato cultivation may be the primary function of most mounds, but these features take on many forms and sizes such that they have been designated as cairns, boundary markers, or even the very general term *ahu*. The mounds are variable in size, morphology, construction technique, and the presence/absence of cultural resources.

Furthermore, there are two mounds within the northern preserve area that are burial mounds.

OTHER ARCHAEOLOGICAL FEATURE TYPES

Other classes of archaeological features occurring on the `Ewa Plain consist of C- and U-shaped habitation loci, circular enclosures (likely collapsed rectangular-shaped structures; Tuggle and Tomonari-Tuggle 1997:104), and the ubiquitous limestone “sinkholes,” which have been described above. Paleoenvironmental features such as the “sinkholes” and wetlands have revealed a wealth of cultural and natural resources allowing researchers to further document paleoenvironmental change on local and regional levels. It is from the environmental research specifically that more robust arguments pertaining to human settlement patterns, adaptation, and chronology have been established for the area.

TRAILS

Finally, trails are known to occur across the `Ewa Plain but are, for the most part, not defined by constructed stone architecture such as other well-known trails (*e.g.*, Stepping Stone Trail, Kealahou, Hawai`i Island). Trails, often overlooked as significant features, are important for facilitation between features and between resource zones. The trails in this area are coastal trails and not part of a regional system. Dating prehistoric trails is difficult, at best, and is typically done through relative dating of archaeological features or features which the trail course around or through.

WWII ERA FEATURES

The WWII era features largely consist of a limestone platform, a long narrow paved structure, a small concrete slab, a single gun position, a portable concrete pillbox, a stone enclosure, a sentry post, and a three-unit gun position. These items represent the military’s previous use of the land.

SITE DESCRIPTIONS

Given the large number of sites and features to be preserved through this IPP, only summary information is presented herein, see AIS (Medrano et al. 2014) for more detailed information. Below provides a table of the sites and features to be preserved through this plan (Table 2).

Table 2: Site Designation, Type, Function, and Significance Assessments.

Note: This table also shows the mitigation recommendations for all the sites in the preservation area.

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
50-80-12-5119	37			Ag/ Habitation/ Refuse/ Storage	d	Preservation via conservation
		1	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		3	U-Shape	Habitation		Preservation via conservation
		15	Reverse F-Shape	Habitation		Preservation via conservation
		17	Karst Pit, Unmodified	Storage/Refuse		Preservation via conservation
		18	Karst Pit, Unmodified	Storage/Refuse		Preservation via conservation
		22	C-Shape	Habitation		Preservation via conservation
		24	L-Shape	Habitation		Preservation via conservation
		30	C-Shape	Habitation		Preservation via conservation
		34	Enclosure	Habitation		Preservation via conservation
		35	C-Shape	Habitation		Preservation via conservation
		37	U-Shape	Habitation		Preservation via conservation
		2, 4-14, 16, 19-21, 23, 25-26, 27A-27B, 28-29, 31-33, 36	Rock Mound	Agriculture		Preservation via conservation
50-80-12-5120	9			Ag/ Refuse/Military/ Boundary	d	Preservation via conservation
		1	Karst Pit	Agriculture		Preservation via conservation
		2	Wall	Habitation		Preservation via conservation
		3	Concrete Pad	Military Building		Preservation via conservation

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
		4	Guard Shack	Military Building		Preservation via conservation
		5	Concrete Enclosure	Military Building		Preservation via conservation
		6	Concrete Foundations	Military Building		Preservation via conservation
		7	Pillbox	Military Building		Preservation via conservation
		8	Concrete Foundations	Military Building		Preservation via conservation
		9	Concrete Foundations	Military Building		Preservation via conservation
50-80-12-7483	10			Agricultural/Refuse Complex w/Pos. Burial Component	d, e	Preservation via conservation
		1	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		2	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		3	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		4	Rock Mound	Pos. Human Burial		Preservation via conservation
		5	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		6, 7, 8	Rock Mound	Agriculture		Preservation via conservation
		9	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		10	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
50-80-12-7484	3			Ag/Refuse Complex w/Habitation Component	d	Preservation via conservation

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
		1	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		2	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		3	Midden Scatter	Habitation		Preservation via conservation
50-80-12-7485	2			Ag/Refuse Complex	d	Preservation via conservation
		1	Rock Mound	Agriculture		Preservation via conservation
		2	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
50-80-12-7486	5			Ag/refuse/storage/Travel/ Ranching/with Pos. Burial Component	d, e	Preservation via conservation and BTP
		1	Karst Pit	Agriculture/Storage		Preservation via conservation
		2	Rock Mound	Pos. Human Burial		Preservation via conservation and BTP
		3	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		4	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		5	Linear Path	Transport		Preservation via conservation
50-80-12-7487	12			Ag/ Refuse/Storage/ Military/Boundary	d	Preservation via conservation
		1A	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		1B	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		1C	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		1D	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
		1E	Karst Pit, Unmodified	Ag/Storage		Preservation via conservation
		1F	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		2A	Airplane Crash	Modern; Transport		Preservation via conservation
		2B	Airplane Crash	Modern; Transport		Preservation via conservation
		2C	Airplane Crash	Modern; Transport		Preservation via conservation
		3	Concrete Pads	Military Foundation		Preservation via conservation
		4	L-Shape	Boundary Wall		Preservation via conservation
		5	Platform/Wall	Historic Foundation		Preservation via conservation
50-80-12-7488	1		Karst Pit	Ag/Refuse	d	Preservation via conservation
50-80-12-7489	2			Ag/Refuse	d	Preservation via conservation
		1	Karst Pit	Ag/Refuse		Preservation via conservation
		2	Karst Pit	Ag/Refuse		Preservation via conservation
50-80-12-7490	3			Multi-functional w/Ag/Storage Component	d	Preservation via conservation
		1	Walled Karst Pit	Ag/Refuse		Preservation via conservation
		2	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
		3	Karst Pit, Unmodified	Ag/Refuse		Preservation via conservation
50-80-12-7491	1		Linear Path	Transport	d	Preservation via conservation
50-80-12-7492	45			Ag/Habitation Complex	d	Preservation via conservation
		1	C-Shape	Habitation		Preservation via conservation

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
		2	Karst Pit, Unmodified	Storage/Refuse		Preservation via conservation
		3A, 3B	Rock Mound	Agriculture		Preservation via conservation
		4A- 4D	Rock Mound Complex	Agriculture		Preservation via conservation
		5	C-Shape	Habitation		Preservation via conservation
		6A - 6Y	Rock Mound Complex	Agriculture		Preservation via conservation
		7	Enclosure	Habitation		Preservation via conservation
		8	C-Shape	Habitation		Preservation via conservation
		9	U-Shape	Habitation		Preservation via conservation
		10	U-Shape	Habitation		Preservation via conservation
		11	Enclosure	Habitation		Preservation via conservation
		12	T-Shape	Habitation		Preservation via conservation
		13	Reverse J-Shape	Habitation		Preservation via conservation
		14	L-Shape	Habitation		Preservation via conservation
		15	C-Shape	Habitation		Preservation via conservation
		16	C-Shape	Habitation		Preservation via conservation
		17	Enclosure	Habitation		Preservation via conservation
50-80-12-7493	1		Karst Pit	Storage/Refuse	d	Preservation via conservation
50-80-12-7494	1		Walled Karst Pit	Agriculture/Storage	d	Preservation via conservation
50-80-12-7496	2			Hab/Ag/Storage Complex	d	Preservation via conservation
		1	Platform	Habitation		Preservation via conservation

Site Number	Feature Totals	Feature Numbers	Feature Type	Function	Site Significance	Recommendations
		2	Platform/Mound	Agriculture/Storage		Preservation via conservation
50-80-12-7497					d	Preservation via conservation
		1	Rock Mound	Agriculture		Preservation via conservation
50-80-12-7498	3			Ag/Refuse/Storage/Undetermined	d	Preservation via conservation
		1	Karst Pit	Storage/Refuse		Preservation via conservation
		2A	Karst Pit	Undetermined		Preservation via conservation
		2B	Karst Pit	Agriculture/Refuse		Preservation via conservation
50-80-12-7499	3		Karst Pit Complex	Ag/Storage/Refuse	d	Preservation via conservation
		1	Karst Pit	Refuse/Storage		Preservation via conservation
		2	Karst Pit	Refuse/Storage		Preservation via conservation
		3	Walled Karst Pit	Ag/Refuse		Preservation via conservation
50-80-12-7500	1		Karst Pit	Ag/refuse	d	Preservation via conservation
50-80-12-7501	1	1	Rock Mound	Dozer Push Pile	d	Preservation via conservation
50-80-12-7502	1	1	Rock Mound	Agriculture	d	Preservation via conservation
50-80-12-7503	1	1	C-Shape	Habitation	d	Preservation via conservation
50-80-12-7504	2			Ag/Refuse	d	Preservation via conservation
		1	Karst Pit	Ag/Refuse		Preservation via conservation
		2	Rock Mound	Agriculture		Preservation via conservation

CONSULTATION

Multiple phases of consultation were undertaken for this project, during the AIS and also after, when preservation sites were discussed. Consultation has been conducted on many occasions with the SHPD, community groups, and other stake holders. The following presents a summary of these consultations, which remain on-going at present.

Various agencies, organizations, and firms involved in the solar farm project were consulted at prior to, during, and after completion of the archaeological fieldwork and through preparation of this PP. Consultation with these interested parties will continue until the project is completed. These parties are listed below:

- Hawaii Community Development Authority (HCDA),
- State Historic Preservation Division (SHPD),
- O`ahu Island Burial Council (OIBC),
- Kalaeloa Heritage Park (KHP),
- `Ahahui Siwila o Hawai`i o Kapolei Hawaiian Civic Club (ASHOK),
- Group 70 International (G70), and
- Scientific Consultant Services (SCS), Inc.

On multiple occasions, from 2013 through 2016, representatives from each of the interested parties listed above attended in-field walkthroughs of the preservation area. The purpose of the walkthroughs was to familiarize everyone with the types of historic properties found during the AIS (Medrano et al. 2014) and discuss mitigation of the sites. This IPP was partially born from those discussions. The names of the people who attended at least one of the walkthroughs are listed below:

- Tesha Malama (HCDA Kalaeloa Director),
- Craig Uemura (HCDA Assets Management Specialist),
- Susan Lebo (SHPD O`ahu Lead Archaeologist),
- Miss Hinalaimoana Wong-Kalu (OIBC Chairwoman),
- Mr. Shad Kane (OIBC, KHP, and ASHOK),
- Mr. Kawika McKeague (G70 Project Senior Planner and Director of Cultural Planning),
- Michael Bungcayao (G70 Project Civil Engineer), and
- Robert L. Spear (SCS Project Archaeological Principal Investigator), and
- Guerin Tome (SCS Archaeological Field Supervisor).

CULTURAL DESCENDANT MEETINGS

G70 conducted multiple cultural descendant meetings for this proposed project. On November 17, 2014, at the Department of Hawaiian Home Lands Hale Pōno‘i. People that participated are as follows:

Ryan McCauley, Tesha Malama, Kawika McKeague, Lani Ma‘a Lapilio, Kilinahe Keliinoi, Moani Kaleikini, Jerome Yasuhara (OHA), Shad Kane, Mike K. Lee, Mana Kaleilani Caceres, Kalehua Caceres, Kaanohi Kaleikini, Kala Kalekini, and Kehau Kaleikini.

The following are notes taken during the meeting:

Everyone agrees to protect and preserve burials in-place as part of a larger archaeological preserve.

Provide perimeter fencing – maybe minimal signage – concern about trespassers and people who would seek to do harm to the area.

Maintain kiawe thicket to some degree as a natural barrier of protection

Mr. Michael Lee inquired as to how we plan to address the inclusion of information he gave to Kawika that shows an interpretation of one site that is different than the accepted interpretation the site in question under the approved AIS. In short, Mr. Lee’s version suggests that agricultural mounds that were identified in the AIS are actually a concentration of burials. Kawika replied that limited testing was done in some of these features with no significant finds. Kawika highlighted that this information could be provided or cited in the BTP or APP. Mr. Lee wanted it on record.

General maintenance and clean-up around the site. Uncle Shad stated that its Civic Club belief that these burials are not as old as some people think (like 1800s). Aunty Paulette suggested these are reminiscent of burials at Makua and parts of Kona and those are much older. Age of the burials not a major issue. Although Base Relocation and Closure (BRAC) identified the Kapolei Civic Club as the “must consult” party, Aunty Paulette voiced her mana‘o (opinion) that the care of the burials should be responsibility of descendants moving forward. In this conversation, the use of cultural monitoring was inquired by Michael Lee.

An access route could be determined (so maybe the fence needs a locked entry gate that could be used from time to time to access the burial(s). Maybe maintain a small access

trail only known to folks that need to know. Should conduct periodic inspections of the burials and other significant sites (at least annually)

If data recovery were to be conducted for any non-burial related features on the parcel, the descendants preliminarily agreed to the use to the use and maintenance of pōhaku [rocks] and lepo [soil] on site for some yet-to-be determined cultural use. G70 to provide a digital copy of the SCS AIS to all cultural descendants.

G70 conducted a cultural descendant meeting on April 10, 2017 at Kapolei Heritage Center Classroom II. People and cultural descendants present at this meeting are as follows:

Kilinahe Keliinoi, Kala Keliinoi, Aliikaua Kaleikini, Ka'anohi Kaleikini, Mike Lee, Mike Dega, Mana Caceres, Kalehua Caceres, Makoa Caceres, Hiehie Caceres, Kamana Caceres, Kawika McKeague, Ryan McCauley, Lani Ma'a Lapilio.

The following is the notes recorded from that meeting as they pertain to the interim preservation plan:

ML: Information about the Malden trail? Please refer to it by the Hawaiian name. It should be identified to protect G70 to show that even though federal laws do not apply they took all into consideration.

ML: Did the Tuggles do any of the work in the area?

ML: Requested buffers around the sites for protection so we can malama (care for) the resources citing several examples of hana'ino (vandalism/ mistreatment) behavior.

ML: Who should the descendant request to get access to the sites?

ML: Requested a hard hat tour for the descendants when possible.

ML: Signage is necessary. Would like a natural or physical barrier and a firebreak.

Ka'anohi K: I just want the sites protected. Once that happens, I have no need to go nīele (be nosey).

On September 5, 2017, G70 held a site visit and cultural descendant meeting to discuss the draft BTP and to allow descendants a chance to see the burial mounds. Furthermore, the meeting added information pertinent to the preservation plan. Attendees at the site visit and meeting are as follows:

Ka'anohi Kaleikini (recognized cultural descendant), Kilinahe Keliinoi (recognized cultural descendant), Mike Lee (recognized cultural descendant), Mana Caceres (recognized cultural descendant), Kalehua Caceres (recognized cultural descendant), Kamana Caveres (recognized cultural descendant), Tesha Malama (HCDA), Kawika McKeague (G70), Lauren A. Esaki-Kua (G70), Lani Ma'a Lapilio, Nigel T. Kingsbury (SCS), Regina Hilo (SHPD),

Items from the draft BTP meeting and site visit that pertain to the Preservation Plan are presented below.

Site Visit:

Nigel then guided the attendees to the second burial mound, State Site # -7486 Feature 2. Upon exiting the burial mound location Mike Lee observed a very small mound like feature under vegetation. Nigel believes that the possible feature may be either an ecofact (less likely) or a small agricultural mound or even a clearing mound (more likely). Mike Lee believes that it is a burial mound. The mound is located approximately 3.5m mauka of the burial mound and slightly toward Coral Sea Road (from the mauka Coral sea Road corner of the burial mound).

Nigel did not attempt to clear the mound nor did he attempt to take photographs because he did not want to take away from the experience of the burial site visit from the attendees.

Meeting Following Site Visit:

Kawika started the meeting with an open question to the group regarding what they observed during the site visit to the burial locations. Specifically, if there were any concerns about the care and protection of the two sites for preservation in-place.

Mike Lee again brought up the mound. Nigel said it is small (in dimensions) and lacks adequate construction techniques (indicating clearing pile or agricultural mound).

This must have created confusion for Mike Lee who stated "no matter how small we don't cut corners when our Iwi Kupuna are involved".

Nigel said "Mike, I apologize for the confusion, I did not mean to say that it needs to be overlooked. I am just stating I don't believe it to be a burial mound".

Aunty Ka'anohi thought it was good that it stays hidden.

Kawika showed plant survey data for the project area in PowerPoint.

Kawika mentioned that in the portion of the preservation plan to be developed that the project team will work with a specific botanical specialist with the idea of taking cuttings or seeds from culturally important plants to either use on property or propagate for future use in the Kalaeloa region.

Kawika mentioned the plane crash features which were initially identified for data recovery are now to be preserved. Showed map of TS sites recorded by SCS.

Kawika asked Mike Lee if he could help communicate our project team's interest to consult with Mr. John Bond from the Kanehili Cultural Hui to help answer the question. Mike Lee said he would help to pass along the request to contact Mr. Bond.

Aunty Ka'anohi said she wanted all military structures removed. That they had no place within the proposed archaeological preserve. They were a mark on our 'āina.

Mana agreed with Aunty Ka'anohi.

Kawika asked "the plane crash features too?"

Aunty Kaanohi affirmed Yes.

Mike Lee agreed.

Kawika asked the attendees – do we need a road/ path on the inside perimeter of the proposed property fence along Tripoli and Coral Sea Road to descendants to access? Is the two-week notification request for descendants' access okay with everyone? What do you folks think? No immediate response so Kawika told the group to think on it and respond later.

Kawika informed attendees that the project is not yet approved. The project still needs a Final EA & FONSI; and the completion of HCDA specific permit approvals. There are a few more steps to go before finalizing. However, even if the project never gets done HCDA has agreed that the Preservation Plan (and the included BTP) will be finalized.

Kawika asked if there were additional comments or concerns.

Mike Lee asks about a fire management plan. Mike Lee – what is the plan if somebody calls 9-1-1 fire fighters come and clarifying what happens. Can HCDA get fire easement for Tripoli Road? Tesha states if there is a fire the State Crash Unit responds to all calls around the airport. Tesha says there are already lockboxes on all of the cattle gates with keys inside to allow access in cases of emergencies. Tesha notes that both City Fire and Crash Units arrive.

Mike Lee – Would the property have an access gate off of Tripoli to allow fire fighters to gain access in to the preserve area? Tesha states that HCDA has always had access issues with people dumping etc. afraid access areas only make more points of illegal entry. Tesha states that if the Fire crews need access they will make their own access no matter what. Mike Lee mentioned locks he has seen in Maui on gates. These are thick metal boxes built on to the gates that fit locks very tight. So, bolt cutters can't get in. helps strengthen this part of a fence too. Project team will continue to work with HCDA on addressing concerns relative to project site safety and access that are separate from burial protection measures. The location of the burials within the interior portion of the proposed preserve provides a natural barrier. Some of these other issues could be addressed in the APP.

Kawika asks again about interior access as part of long term maintenance? Aunty Ka'anohi would rather not have a formal access as it may encourage unnecessary attention and nīele behavior.

Mike Lee asks about maintenance plan within the PV area as it will be close to preserve area and you don't want trees to pop up in the PV area. Kawika brought up that the plan is 30% in detail design. Current plan shows one contiguous preserve and two other smaller areas. A selection of invasive trees have been identified for potential removal. There will be a need for a firebreak between the preserve and the development area and an additional buffer area to be established.

Kawika shows the incomplete surveyor map. Kawika informs attendees that the current data shows some issues with the proximity of the project to the buffer areas of the proposed preservation area. Surveyor work to be completed in two weeks. Adjustments to development layout will occur to ensure all sites and buffers are accounted for.

Mike Lee asks if the preservation area will be filed with the Bureau of conveyances?

Tesha and Kawika unanimous yes.

OIBC MEETINGS

The proposed project and the recognition of cultural descendants for the project has been on the agenda at the OIBC on four separate occasions.

On October 9, 2013, Jeff Overton of G70, Matt Blake of Aloha Solar Energy presented a PowerPoint presentation on the AIS findings. Wong-Kalu reminded the public and council members that no discussion was permitted and only testimony would be heard as the council no longer had quorum.

On December 11, 2013, the OIBC recognized the following cultural descendants to the possible burial mounds (Site #-7486 Feature 2 and Site #-7483 Feature 4):

Paulette Kaanohiokalani Kaleikini, Moani Umiaimoku Kaleikini, Tuahine Kanekapolei Kaleikini, Kala Waahila Kaleikini, Kalahikiola Mahikeahi Keliinoi, Kilinahe Ialuamoku Keliinoi, Aliikaua Keawenuiaumi Kaleikini, Noeau Kamehanaokala Kaleikini, Haloa Kekoo Namakaokalani Kaleikini, Mahiaimoku Kekaulike Kaleikini, Moehonua Keaweamahi Kaleikini, Jim Medeiros Senior, Michael Lani Keaweamahi, April Leimomi Keaweamahi, Shanlyn Maile Keaweamahi Kanohokula, Brandy Kalehua Kamohalii Caceres, Norman “Mana” Christopher Moore Kaleilani Caceres, Kekamamakoakailihou Kaleilani Kamohalii Caceres, Keahealaiianiikekamaehuokahikiku Kiekiekananiokuuleilehua Kamohalii Caceres, Kekamakeuakauikuhaikalai Kalehuahiehie Kamohalii Caceres, JR Keonekapu Williams, Kimball Kekaimalino Kaopio.

On May 14, 2014, G70 and SCS presented again on the completed AIS conducted for the proposed project.

On July 9, 2014, the OIBC recognized Michael Kumukauoha Lee as a cultural descendant to the possible burial mounds (Site #-7486 Feature 2 and Site #-7483 Feature 4) identified during the AIS. On June 28, 2017, the OIBC recognized four additional cultural descendants as named below:

Piilani Keonealoha Kaleikini, Kahekilinuiahumanu Ulukou Kaleikini, Heulu Kuaialii Kaleikini, and Lawakua Huanuikalalailai Kaleikini.

On October 25, 2017, the OIBC recommended approval of a Burial Treatment Plan (BTP) for two burial mounds (Site #-7486 Feature 2 and Site #-7483 Feature 4) identified during the AIS. The two specific motions that the OIBC decided were both unanimous votes:

1. Motion and Approval for preservation in place of the two burials
2. Motion and Approval to accept the burial treatment plan as presented with recommendations.

The two burial mounds will be preserved for perpetuity within an archaeological preserve complex.

‘AHAHUI SIWILA HAWAI‘I O KAPOLEI (ASHOK)

On July 21, 2013 Kawika McKeague (G70), Kalani Ka‘anā‘anā and Matt Blake (Sunetric) held a meeting with 15 ASHOK members to discuss the proposed solar farm. The following points were discussed at the meeting:

ASHOK appreciated ASEF, SCS, and G70’s hard work to the make the best of a bad start. Appreciated the thoroughness of thought and approach in understanding the cultural landscape and figuring how to make the project fit into the landscape.

ASHOK supports preference and approach to preserve the trails despite the impacts from cut intrusions and other identified historical modifications that may have occurred as part of military occupation.

ASHOK supports preserve area concept and necessity to develop partnership and collaboration with KHP to develop area approach to site preservation.

ASHOK sought clarity to AIS conclusion for “no further work” on historical military features as some retirees from community that are active in other organizations may come out at HCDA meeting and voice their concern. Kawika McKeague suggested a couple of things:

a. Informed that G70 is working with HCDA on a cultural/community stakeholder meeting tentatively scheduled for August and prior to HCDA hearing which presents an opportunity to hear others’ concerns.

b. As we want to finalize and file the AIS, Kawika McKeague suggested that AIS recommend “selective data recovery/preservation” (need clarity from SCS to right professional language) for at least the plane crash site and coastal defense pillbox - from the perspective we don’t physically preserve these two features in their exact physical location. Remnants from crash site could go to aviation museum and maybe we find a better suitable place and re-adaptive use

for pillbox (since it is portable and evidence suggest that it's probably not in its original "historical context"). All other military related sites warrant no additional archaeological work.

c. Question after the meeting as to whether or not we could reuse any of the existing historical concrete platforms in place. Kawika McKeague said he did not know the answer as the project was in concept phase at this point. Kawika said consideration of potential use only if feasible to layout and structure foundation requirements.

For all sites/trails on the exterior of conceptual project layout, recommending at least a 10-20 m buffer of protection in this preliminary stage.

Regarding the two agricultural mounds to be impacted within the conceptual footprint- Kawika McKeague shared the AIS recommendation of "no further work" – folks were quietly hesitant and some discussion followed with their concerns (similar to those heard in KHP meeting). ASHOK believes there is cultural value and information within these sites. ASHOK shared one of two preferences to either

a. Preserve these two sites as-is with a designated buffer and have project develop and work around these sites. Kawika McKeague highlighted briefly the concern that this approach would potentially segment portions of conceptual layout but that project proponents could possibly adjust and recover in other areas to meet design objective.

b. Conduct data recovery for information (Uncle Shad's recommendation) data recovery and removal of the site by hand (versus bulldozer). Couple options would be to spend time to deconstruct and reconstruct elsewhere in the property or approved area by HCDA as part of historical "remembrance" of kupuna (ancestors) footprint in the area. Soil strata of these sites would be screened for any artifact/ecofacts and report generated based upon findings. Artifacts/ecofacts could potentially become part of historical/cultural "museum" as part of KHP's project to educate and share 'ike (knowledge) with visitors. It was recognized this method versus buffer/preserve may be more aggressive and costly to ASEF but in the end, it would give full access to this area of land once data recovery. This is an unsettled issue relative to more talk story with ASHOK and others.

One concern raised about whether or not there are federal monies involved in project (was not a negative but wanting to make sure we were well prepared for others in community that might look for pukas in our process). If potential for federal involvement, there was a voiced concern about triggering NHPA and NAGPRA and utilization of these processes by others to stop and kill the project.

ASHOK recommended archaeological monitoring throughout project construction. The conversation did not get as far as to discuss what happens if we find a site within development area during monitoring.

Regarding Malden trail, the overlay constructed from 1825/1878 maps indicate plausibility/possibility that portion of this trail could be in our project area and could have been part of intrusion cut #1 (closest to Coral Sea Road). However, Kawika McKeague shared the inconsistency of overlaying maps from different eras and in his experience, has seen deviation variance as little as 10m up to several hundred meters. All to say, the line is not absolute truth. However, a part of our conceptual layout including part of the Malden Trail. Recommended early monitoring/mitigation to verify.

Issue of ho‘oponopono (conference in which relationships were set right) and appropriate mihi/huikala (repent/cleanse) still need to be refined for long-term. ASHOK appreciated our recognition of applying and being mindful of this cultural approach to reconciliation. I see natural pathways of partnerships and our active participation is part of that mihi process.

On March 21, 2017 G70 and SCS conducted a consultation meeting with ASHOK. The meeting notes are as follows:

ASHOK supports the direction and intent of the archaeological preservation plan, burial treatment plan, and dismissal of data recovery plan. Recommends that archaeological sites near the development footprint consider appropriate buffers but did not cite specific delineation distances. Inquired as to what SHPD typically requires. The response was that it all depends on the type of site, location of site, and proximity to adjacent activity and land use. They would like to be update once the APP draft is prepared for further discussion [have since been updated].

ASHOK would like to be kept in the loop regarding any update from conditions assessment and finds during any supplemental work.

The biggest discussion point was about access to the proposed archaeological preserve area and how will it be utilized during the duration of the lease. Kawika McKeague said for now, the only thing on the table verified was passive preservation – i.e. probably provide perimeter fencing around the whole parcel and protecting the sites as-is with some periodic maintenance and inspection of sites. ASHOK sees an opportunity for perhaps a non-profit to collaborate with ASEF and HCDA as landowner to provide active preservation/restoration activities through place-based learning and stewardship. Great idea that requires discussion with ASEF and HCDA to define how that could be set up and what relationship/expectation could exist with ASEF as a partner during site control period.

Kawika McKeague said he would bring that discussion to the appropriate persons at HCDA and the applicant and follow-up accordingly.

KALAELOA HERITAGE PARK ADVISORY GROUP

On June 28, 2013, G70 conducted a consultation meeting with the Kalaeloa Heritage Park Advisory Group to discuss the AIS and the proper mitigation measures of the newly identified historic properties. The following are the recorded notes from this meeting regarding preservation plans:

- Agreed no further testing necessary for potential/probably burial sites. Treat them as burials.
- Possibilities include reuse of material on site.
- General discussion regarding possible buffer zones for sites and component features.
- Discussed the Heritage Park on 77 acres mauka of our project and the remote possibility that the preservation area from this project could be added to the heritage park.
- Land locked sites, if necessary, is ok.
- Discussion on need for archaeological monitoring.

KANEHILI HUI

On September 19, 2017 Kawika McKeague (G70), Nigel T. Kingsbury (SCS), and John Bond (Kanehili Hui) met at the intersection of Tripoli Road and Coral Sea Road to conduct a site visit within the project area. Prior to entering the property Kawika gave a brief introduction of the project, the historic properties identified in Medrano et al. (2014) AIS report, and the mitigation measures required for the project to proceed.

Nigel led the group to the aircraft crash site (Site #-7487 Feature 2A, 2B, and 2C). The group discussed the current preservation plan for the site, passive preservation. The group then proceeded to make its way to the historic military structural remnants (Site #-5120). Mr. Bond shared his knowledge of the military structures. Furthermore, he concurred that the structural remnants appeared to have been previously moved to their current position. Mr. Bond expressed interest of relocating these remnants to the Ewa Battle Field site. Mr. Bond informed SCS and G70 that his research indicates that the parcel was utilized in the Cold War for nuclear weapons loading and unloading. Mr. Bond has provided SCS and G70 with numerous historic photographs of the project area and of the military structures as they would have looked in original condition (Figures 5 and 6).

PREPARING THE FINAL PRESERVATION PLAN

The preparation of the final APP included coordination and consultation with HCDA as the landowner. SHPD was also consulted in preparation of the final APP. OHA was consulted and invited to comment on the final APP due to the presence of traditional Hawaiian historic properties under criterion e. Select community and cultural organizations such as ASHOK, KLHF, and Hui Kanehili that have been a part of the consultation process since 2012 were also invited to provide comment. Recognized Cultural Descendants, whose contact information were available, were also invited to participate and comment.

Concerns shared were primarily focused on ensuring the agreement and conditions with the approved Burial Treatment Plan (to become a Burial Site Component of a Preservation Plan) would continue to be honored. Further, other comments requested more direct language to ensure both the lessee (ASEF II) and the landowner (HCDA) would continue to appropriately manage the site and its resources; ensure proper notification and communication with required parties; and ensure access, wherein feasible and appropriate during the both the period of the lease and in perpetuity of the stewardship of the land. One key recommendation by SHPD was to include language that changes in this document could be required as conditions change over time. For example, it is unclear at present as to what, if any, will the long-term impacts of sea level rise be for the general Kalaeloa coastline in the next 50 years. HCDA, as the landowner, should have the flexibility to adapt to address any changes that should be made as a response to these unknown future events and effects.

The proposed long-term preservation measures in this preservation plan reflect and respond to the thoughts shared.

We also note the contributions and the loss to our community as a whole with the passing of Aunty Kaanohi Kaleikini and Kahu Michael Kumukauoha Lee, who were two prominent voices that guided our project and process, and are sincerely grateful for their mana and aloha.



Figure 5. Photograph of a similar pillbox as recorded within the current project area. Photograph courtesy of Mr. Bond.



Figure 6. Photograph of an anti-aircraft gun battery located outside of the project area. The photograph is an example of what the military structural remnants recorded within the current project area would look like if they were in situ. Photograph courtesy of Mr. Bond.

SITE PRESERVATION

Pursuant to the DLNR § 13-277 Hawaii Administrative Rules, preservation of the 23 sites and 146 associated features listed above will take the form of avoidance and protection, also referred to as *conservation*. It is proposed herein that these existing sites and features will be left in place.

INTERIM AND PERMANENT PROTECTION MEASURES

The following sections address the interim and permanent preservation measures for the 23 sites. Interim measures are designed to mitigate damage in the short-term, during construction activities, while permanent measures are designed to protect the Historic resource in perpetuity.

INTERIM MEASURES (§ 13-277-5)

Pursuant to the DLNR § 13-277 Hawaii Administrative Rules, preservation of the 23 sites and 146 associated features listed above will take the form of avoidance and protection, also referred to as *conservation*. It is proposed herein that these existing sites and features will be left in place and afforded an interim buffer zone demarcated by yellow construction tape. All sites identified within TMK: (1) 9-1-013:070 (with the exception of Site #-7501 Feature 1, discussed below) shall have a minimum permanent buffer zone of 10 feet from the edge of each feature outward in all directions. An additional 10-foot interim buffer will be added during all construction activities. This additional buffer will ensure each feature is a minimum of 20 feet from construction activities. Site #-7501 Feature 1 shall have a 10-foot permanent buffer and an additional 7 foot interim buffer. This additional buffer will ensure that no construction activities are conducted within a radius of 17 feet from the edge of Site # 7501 Feature 1.

The buffer zones will be surveyed and added to all construction plans prior to construction activities. Non-biodegradable survey pins shall be inserted into the ground along the exterior boundary of the buffer zone at appropriate intervals. Inspection of the survey pins and buffer zones shall also be conducted regularly during construction in order to ensure the integrity of the interim buffer zone. The interim preserve area will consist of a single large preserve in the northern portion of the parcel (including the burial mound locations) and eight smaller landlocked preserve areas. This “archaeological preserve” will afford full protection of the historic properties. The following sections outline the necessary interim preservation measures that will apply.

INTERIM PROTECTION MEASURES

Interim protection measures outlined here are applicable to all sites and features to be preserved within TMK: (1) 9-1-013:070. The interim protection measures will be implemented prior to any form of ground disturbing activities and verification shall be presented to the SHPD prior to any work being performed within TMK: (1) 9-1-013:070 is performed. All monitoring conventions as outlined in the SHPD approved AMP (Kingsbury et al. 2017B) shall be followed. Additionally, the following interim protection measures shall be followed.

1. No work shall be initiated within TMK: (1) 9-1-013:070 prior to informing SHPD of the projects scope and site plans showing proximity to the interim buffer zone as described here.
2. Prior to the initiation of any and all work associated with the project an archaeologist shall inspect and record that all interim preservation measures are in place. The archaeologist shall submit a brief document to the SHPD verifying that all interim preservation measures are in place prior to the initiation of work on site.
3. Under the projects, SHPD approved (Kingsbury et al. 2017B), AMP the archaeological monitor shall ensure that the interim protection measures are in place throughout the duration of the project. ASEF II Site Supervisor to inspect interim protection measures in addition to the archaeological monitor.
4. Additionally, all land altering work within TMK: (1) 9-1-013:070 parcel shall be subject to archaeological monitoring. Furthermore, there will be no work within the interim buffer zone. All work outside of the interim buffer shall be monitored by an archaeologist.
5. The preserve portions of TMK: (1) 9-1-013:070, containing the sites and associated features stipulated within this document, shall be cordoned off from the area planned for development by yellow caution tape. This will be accomplished under the supervision of a qualified archaeologist and recorded by a surveyor.
6. Within the preserve boundaries, no stones whether stacked, piled, or strewn about shall be moved, lifted, pushed, or affected in anyway.
7. The caution tape barrier shall consist of two rows of caution tape an upper alignment will be 5 feet off the ground and a lower one at 3 feet off the ground.
8. This caution tape barrier shall be placed 20 feet away (toward the proposed project area) from all sites and associated features to effectively establish a 20-foot interim buffer zone. Except for Site #-7501 Feature 1 which will have a caution tape barrier 17 feet away (toward the proposed project area), effectively establishing a 17 foot buffer between the feature and the construction activities.
9. Access to the interim preservation area will be strictly off limits to machinery, ground disturbance, and most construction related individuals.
10. The interim preserve is off limits as a storage area for construction materials, machines, parking, or personnel.

11. Individuals allowed in to the interim preserve area include recognized cultural descendants, archaeologist, the landowner (HCDA representative), ASEF II project management, and those assigned to clear the interim preserve of modern trash that may enter, via wind or water, the interim preserve area during the construction related activities. Construction personnel required to construct the pathway to the preserve area or firebreak may enter the preserve area when accompanied by a qualified archaeological monitor.
12. If vegetation clearing within the interim preserve area is deemed necessary to avoid site and or feature destruction then the SHPD shall be notified in writing of the planned vegetation clearing, how the work is to be accomplished, who is to perform the work, and photographs documenting the vegetation and proximity to sites and or features shall be included. SHPD shall determine the appropriate mitigation measures.
13. If an act of nature (earthquake, tsunami, or fire) were to damage the sites or features SHPD shall be notified of the damages to the sites and associated features.
14. A botanical specialist shall be contracted for the portion of the project to be developed. The botanical specialist will be contracted with the taking of cuttings or seeds from culturally important plants for use either on property or propagate for future use in the Kalaeloa region.

LONG-TERM PRESERVATION MEASURES (§ 13-277-6)

Pursuant to the DLNR § 13-277 Hawaii Administrative Rules, preservation of the 23 sites and 146 associated features listed above will take the form of **avoidance and protection, also referred to as conservation**. It is proposed herein that all sites identified within TMK: (1) 9-1-013:070 shall have a minimum permanent buffer zone of 10 feet from the edge of each feature outward in all directions. The perimeter fence around the property is the primary access control to the parcel and to the sites themselves. Internally, there is a natural buffer and barrier between the majority of the preservation area and the active areas for the solar farm. For sites within the active solar farm area, existing measures include maintain a passive natural vegetation area of minimally 10 feet but wherein appropriate, also allowing the 10 feet construction buffer to remain as-is. The perimeter of these areas are demarcated with kiawe mulch to integrate areas suitable for vehicle and pedestrian access. There shall be no access into the natural vegetation areas without written authorization of the lessee, Aloha Solar Energy Fund, LLC., as directed by HCDA, as the landowner.

Long-term preservation of the 23 sites in the project area will take the form of passive preservation for at least through the duration of the lease between Aloha Solar Energy Fund, LCC (ASEF II) and HCDA as the landowner. ASEF II is the sole lessee of the Project Site ASEF II has a 20-year lease that ends on April 2, 2040, with an extension in the range of five to ten years that could extend their lease operations to April 2, 2045 or April 2, 2050. At end of the

term of this lease, ASEF's leasehold interest will be terminated and HCDA as the landowner will be solely responsible for the continued adherence and compliance with the agreed-to conditions of the preservation plan.

- The lessee, Aloha Solar Energy Fund, LLC., as directed by the landowner HCDA, will control access to the project area, and will instruct authorized personnel inclusive of operations and maintenance, vendors, or other designated persons to avoid the preservation area to the north and the smaller preserve areas in the southern portion of the project area. The location of the preservation area and the preserve areas will be marked on overall project maps and avoidance instructions will be placed on construction plans and specifications. All communications and requests should be coordinated between both HCDA and the ASEF II operations manager.
- The lessee, Aloha Solar Energy Fund, LLC., as directed by the landowner HCDA, will provide project maps and avoidance instructions for the location of the preservation area and the preserve areas to several emergency responders to the site, i.e. Honolulu Fire Department or Kalaeloa Airport Fire Rescue that would be primary responders to an emergency on-site.
- The lessee, Aloha Solar Energy Fund, LLC., as directed by the landowner HCDA, will be responsible for monitoring the physical and visual integrity of the Site, with SHPD inspections conducted on an intermittent basis to assure the continued integrity of the Site is maintained, inclusive of but not limited to issues of trash management, vegetation overgrowth, or any illegal trespassing or tampering of sites.
- If an act of nature (earthquake, tsunami, or fire) and/or vandalism or other human-induced activities were to damage the sites or features, SHPD shall be notified immediately of the damages to the sites and associated features. Measures would be taken to protect the sites from further exposure risks, harm, or injury.
- Although it does not impact the project area at this time, the landowner may need to reassess the extent of measures required in the future as appropriate mitigative responses to the impacts of sea level rise (SLR). Projection models suggest that by Year 2100 there could be as much as a 3.2 foot elevation increase of SLR along all coastlines.
- These provisions are made for the on-going preservation of the 23 SIHP sites. The sites will be preserved in perpetuity with preservation provisions being binding on any successive lessee and landowners. A metes and bounds description has been prepared by the landowner and will be recorded on the property deed and registered with the State Bureau of Conveyances.
- The preservation in place of two identified burial mounds (State Sites 50-80-12-7483 Feature 4 and 50-80-12-7486 Feature 2) are part of the overall preservation approach. As approved in the October 2017 Burial Treatment Plan, this plan also includes a Burial Site Component of a Preservation Plan included as Appendix B in this document. In 2017, the recognized cultural descendants had made recommendations that were adopted relative to the care and treatment of these two burial sites. Conditions within the Burial Treatment

Plan relative to their long-term care and protection inclusive of filing the two burials with the State Bureau of Conveyances will be continued and/or met. If changes in conditions or sentiments by the cultural descendants as a whole as to their effective treatment may occur in the future, this plan recommends that Aloha Solar Energy Fund, LLC., as the lessee and HCDA as the landowner engage in meaningful and participatory consultation with recognized descendants that continue to be participants in those discussions, if required.

- Current lease conditions relative to site access by the Recognized Cultural Descendants does require one week written advance notice to Aloha Solar Energy Fund, LLC as the lessee.
- Given the nature and conditions of the lease and operations of the solar facility, it is not recommended that any active site preservation/restoration activities occur on the site during the duration of the lease. However, if appropriate cultural stewards are interested in the care and maintenance of the archaeological sites post-lease, it is recommended that planning and coordination of the lands and resource responsibilities occur at the earliest possible time prior to the transfer of lands back to HCDA as the landowner to ensure all requirements of the lease conditions during the decommissioning of the project are met. Site conditions relative to the care of historic properties should be clearly assessed and evaluated prior to transfer from lessee to HCDA.

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APPENDIX A: SHPD CORRESPONDENCE

NEIL ABERCROMBIE
GOVERNOR OF HAWAII



HISTORIC PRESERVATION DIVISION DEPARTMENT OF LAND AND NATURAL RESOURCES

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WILLIAM J. AILA, JR.
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CONSERVATION AND RESOURCES ENFORCEMENT

ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

February 25, 2014

Dr. Robert Spear
Scientific Consultant Services, Inc.
1347 Kapiolani Boulevard, Suite 408
Honolulu, Hawaii 96814

LOG NO: 2013.6641, 2014.00823,
2014.00528
DOC NO: 1402SL27
Archaeology

Dear Dr. Spear:

**SUBJECT: Chapter 6E-8 Historic Preservation Review—
Archaeological Inventory Survey Report for a Proposed Solar Farm in Kalaeloa
Honouliuli Ahupua'a, 'Ewa District, O'ahu Island, Hawai'i
TMK: (1) 9-1-013:070**

Thank you for the opportunity to review this revised report titled *Archaeological Inventory Survey Report for a Proposed Solar Farm in Kalaeloa, Honouliuli Ahupua'a, 'Ewa District, O'ahu Island, Hawai'i* [TMK: (1) 9-1-013:070] (Medrano et al., February 2014). We received this submittal on February 25, 2014.

The archaeological inventory survey (AIS) was conducted by Scientific Consultant Services, Inc. (SCS) of 44 acres of undeveloped land in support of a proposed solar farm. The property owner is Hawai'i Community Development Authority (HCDA). The AIS identified 23 historic properties (Table 1), of which two were previously identified (Sites 5119 and 5120). The sites mainly consist of complexes of Traditional Hawaiian habitation and/or agricultural, refuse, and storage features. Also present are two probable burial features (Site 7483, Feature 4, and Site 7486, Feature 2), one site containing a military airplane wreckage (Site 7487) and one site containing military structural remnants (Site 5120).

Data recovery is recommended for Site 7487, Features 2A-2C and for Site 7502, Feature 1, while all other sites and/or features are recommended for preservation. Site 7487, Features 2A-2C (airplane crash wreckage) were recommended for data recovery because the Pacific Aviation Museum expressed interest in having the site further documented and having all materials collected for possible display. Site 7502, Feature 1 (agricultural rock mound) was recommended for data recovery because it will be impacted during installation of the solar farm structures. All of the sites are recommended as significant pursuant to Hawai'i Administrative Rules (HAR) §13-275-6 under Criterion d (have yielded, or has potential to yield, information important to prehistory or history). Sites 7483 and 7486 also are recommended as significant under Criterion e (importance to Native Hawaiians) because of the probable presence of Native Hawaiian burials. Four mitigation measures are recommended to address potential for construction of the solar farm to adversely affect historic properties. These consist of (1) a preservation plan for all historic properties recommended for preservation (see Table 1); (2) a burial treatment plan for Site 7483, Feature 4 and for Site 7486, Feature 2 which have been identified as probable burial features; (3) a data recovery plan for Site 7487, Features 2A-2C and for Site 7502, Feature 1; and (4) an archaeological monitoring plan for on-site monitoring during all project-related ground disturbing activities to address any potential subsurface historic properties that may be encountered and to ensure that the sites recommended for preservation are not adversely impacted during construction. We concur with the site assessments and mitigation recommendations.

The report provides adequate discussion of the project environs, cultural and historical background, previous archaeological investigations, field and laboratory methods and results, and the site assessment and mitigation recommendations. The revisions adequately address the issues and concerns raised in our earlier review correspondence (October 18, 2013; Log No. 2013.4819, Doc. No. 1310SL16), and in our project meetings and email correspondence pertaining to several interim drafts (November 22, 2013; February 5, 21, and 25, 2014).

Figure 7. SHPD acceptance letter of the 2014 AIS, page 1.

Dr. Spear
February 25, 2014
Page 2

The archaeological inventory survey report meets the requirements specified 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.

Please contact me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

Susan A. Lebo

Susan A. Lebo, PhD
Oahu Lead Archaeologist

Table 1. Archaeological Historic Properties Identified During AIS.

SIHP	Total Features	Feature Types	Function	Significance Recommendation	Mitigation Recommendation
7483	10	Karst pits, mounds (possible burial), mounds (agriculture)	Ag/refuse, w/possible burial component	d, e (Feature 4)	Preservation
7484	3	Karst pits, midden scatter	Ag/refuse, habitation complex	d	Preservation
7485	2	Karst pit, mound	Ag/refuse	d	Preservation
7486	5	Karst pits, linear path, and rock mound	Ag/refuse, ranching, transportation, w/possible burial component	d, e (Feature 2)	Preservation
7487	12	Karst pits, airplane crash remnants, concrete pads, L-shaped structure, and platform/wall	Ag/refuse, storage, military, and boundary	d	Preservation, Data Recovery (Features 2A-2C)
7488	1	Karst pit	Ag/refuse	d	Preservation
7489	2	Karst pits	Ag/refuse	d	Preservation
7490	3	Karst pits, walled karst pit	Ag/refuse	d	Preservation
7491	1	Path	Transportation	d	Preservation
7492	45	Rock mounds, enclosures, and C-, reverse J-, L-, T-, and U-shaped structures	Ag/habitation complex	d	Preservation
7493	1	Karst pit	Storage/refuse	d	Preservation
7494	1	Walled karst pit	Ag/storage	d	Preservation
7496	2	Platform, platform/mound	Ag/habitation and storage complex	d	Preservation
7497	1	Rock mound	Ag	d	Preservation
7498	3	Karst pits	Ag/refuse, storage complex	d	Preservation
7499	3	Karst pits, walled karst pit	Ag/storage and refuse complex	d	Preservation
5119	37	Karst pits, and C-, L-, and U-shaped structures	Ag/refuse, storage, habitation complex	d	Preservation
5120	9	Karst pit, wall, concrete pad, guard shack, and concrete enclosure, foundations, and pillbox	Ag/refuse, military, boundary	d	Preservation
7500	1	Karst pit	Ag/refuse	d	Preservation
7501	1	Mound	Dozer push pile	d	Preservation
7502	1	Mound	Ag	d	Data Recovery (Feature 1)
7503	1	C-shaped structure	Habitation	d	Preservation
7504	2	Karst pit, mound	Ag/refuse	d	Preservation

Figure 8. SHPD acceptance letter of the 2014 AIS, page 2.

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STATE PARKS

May 29, 2017

Chris M. Yamamoto
Right-of-Way Manager
Highways Division
Department of Transportation
Right-of-Way Branch, Rm 691
Kapolei, HI 96707
Email: Chris.M.Yamamoto@hawaii.gov

Log No.: 2017.00844
Doc. No.: 1705KM06
Archaeology

Dear Mr. Yamamoto:

SUBJECT: **Chapter 6E-8 Historic Preservation Review –
Request for Consultation – HWY-RM 3.93442
Aloha Solar Energy Fund II LLC Project along Coral Sea Road
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 request for consultation regarding the proposed Aloha Solar Energy Fund II LLC (ASEF) project. The State of Hawaii Department of Transportation (HDOT) is consulting on behalf of the project proponent, ASEF. The State Historic Preservation Division (SHPD) received this submittal on April 27, 2017. The submittal includes a cover letter and an attached field inspection report titled *Archaeological Literature Review and Field Inspection in Support of the Proposed Utility Corridor of the Proposed Kalaeloa Solar Farm Undertaking through FDR/CSR Terminal Along Coral Sea Road and Across Roosevelt Avenue, Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu, Hawaii'i, TMK No. [1] 9-1-013:070 por. and Coral Sea Road Right-of-Way* (Kingsbury and Spear, February 2017).

The submittal indicates that 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 the project on February 25, 2014 (Log No. 2013.6641, 2014.00823, 2014.00528; Doc. No. 1402SL27). The second component, the 12 kV electric line, includes 9400 linear feet that includes 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 line will be installed parallel to CSR and eventually connect to a conduit near Roosevelt Avenue and Renton Road.

In support of the historic preservation review process, a literature review and field inspection (LRFI) of the second component was completed in February 2017 (Kingsbury and Spear). The LRFI involved a 100% pedestrian survey of the 18.32 project area. No surface historic properties were identified within the project area; however, a number of limestone dissolution pit caves were observed outside of the CSR ROW. Although dissolution pit caves are sometimes known to contain cultural deposits (including artifacts, midden remains, human burials, etc.) no dissolution pit caves occurred within the CSR ROW and the density of caves increases away from the ROW. The LRFI recommends an AIS due to the potential to encounter pit caves and subsurface deposits below the CSR ROW.

In addition to the LRFI, the submittal indicates that an AIS is recommended and proposes a testing strategy. The proposed testing strategy involves limited subsurface testing of 5 test trench excavations within the underground

Figure 9. SHPD LRFI recommendation concurrence letter, page 1.

Mr. Yamamoto
May 29, 2017
Page 2

portion of the utility corridor and at least one additional trench in the area where utility poles will be placed for the overhead segments of the corridor.

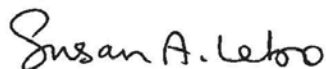
Based on the above information, the SHPD concurs with the recommendation for an AIS. SHPD requests that the selected archaeological consultants contact us regarding the proposed AIS testing strategy, to ensure that the study meets the requirements of HAR §13-276.

SHPD looks forward to reviewing the archaeological inventory survey report, pursuant to HAR §13-276, as well as any subsequent mitigation plans as appropriate, based on the survey findings, prior to initiation of the proposed project. Please refer to the SHPD website for a listing of archaeological firms.

Finally, although the LRFI (Kingsbury and Spear, February 2017) document does not fulfill the requirements of an archaeological inventory survey as specified in Hawai'i Administrative Rules (HAR) §13-276, it serves to facilitate project planning and supports the historic preservation review process. 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 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: Dean Nishimura, HDOT (Dean.N.Nishimura@hawaii.gov)
Morgan Davis, SCS (morgan@scshawaii.com)

Figure 10. SHPD LRFI recommendation concurrence letter, page 2.

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September 11, 2017

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

IN REPLY REFER TO:
Log No.: 2017.01876
Doc. No.: 1709KM03
Archaeology

Dear Mr. Stout:

SUBJECT: **Chapter 6E-8 Historic Preservation Review –
Addendum Archaeological Inventory Survey for the Proposed
Utility Corridor for the Kalaeloa 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 report titled *Addendum AIS to Medrano et al. (2014) AIS: Archaeological Assessment Report in Support of the Proposed Utility Corridor of the Proposed Kalaeloa Solar Farm Project through FDR/CRS Terminal Along Coral Sea Road and Across Roosevelt Avenue, Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu, Hawai‘i, TMK [1] 9-1-013 [por.] and Coral Sea Road Right-of-Way* (Kingsbury and Spear, August 2017). The State Historic Preservation Division (SHPD) received this submittal on August 23, 2017. The SHPD previously concurred with the recommendation for additional survey work for the newly-added utility corridor work on May 29, 2017 (Log No. 2017.00844, Doc. No. 1705KM06). The testing strategy for the additional work was accepted on June 9, 2017 via email (Kimi Matsushima [SHPD] to Morgan Davis [Scientific Consultant Services]).

This addendum archaeological inventory survey was prepared at the request of G70 on behalf of the HCDA and the Aloha Solar Energy Fund II (ASEF), the project proponents. 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 AIS fieldwork involved a 100% pedestrian survey and subsurface testing involving the excavation of 6 trenches within the area that the 12kv is planned to be underground. In general, the excavations revealed a relatively uniform stratigraphy of recent fill deposits, with some natural alluvium, overlying a very shallow limestone bedrock. All of the excavations terminated above 1.0 mbs and at least two excavations (ST-4 and ST-5) encountered the limestone bedrock immediately below the roadway/road ROW surface. Additionally, two excavations (ST-1 and ST-6) terminated due to buried utility lines. No subsurface cultural deposits or historic properties were identified during the AIS fieldwork. Due to the negative findings, the results of this inventory survey are reported as an archaeological assessment (AA) per Hawaii Administrative Rules (HAR) §13-275-5.

Figure 11. SHPD 2017 Addendum AIS acceptance letter, page 1.

Mr. Stout
September 11, 2017
Page 2

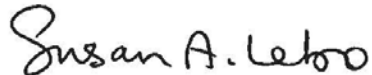
Although no historic properties were identified within the 12kV portion of the project, historic properties were identified within the Parcel 070 area during the original Medrano et al. (2014) AIS. Therefore, the current addendum AA recommends the project effect determination remain, "effect, with proposed mitigation commitments." 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 warrants on-call monitoring.

Based on the above information, the results of the addendum AA work does not change the original project effect determination for the overall project. Therefore, the SHPD's determination remains "effect, with proposed mitigation commitments." The SHPD concurs with the recommendation of on-call monitoring for the 12kV portion and additional mitigation as appropriate for the other portion (Parcel 070) of the project.

The report meets the minimum requirements of Hawaii Administrative Rules (HAR) §13-276-5. **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.

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)
Chris M. Yamamoto, HDOT (Chris.M.Yamamoto@hawaii.gov)

Figure 12. SHPD 2017 Addendum AIS acceptance letter, page 2.



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October 6, 2017

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

IN REPLY REFER TO:
Log No.: 2017.01876
Doc. No.: 1710KM03
Archaeology

Dear Mr. Stout:

SUBJECT: **Chapter 6E-8 Historic Preservation Review –
Archaeological Monitoring Plan for the Proposed
Utility Corridor for the Kalaeloa 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 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.

Figure 13. SHPD AMP acceptance letter, page 1.

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.

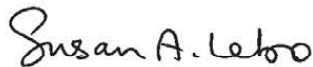
Documentation of non-burial cultural deposits will include recording stratigraphy using USDA soil descriptions, recordation of feature contents through excavation or sampling of features, representative scaled profile drawings, photo documentation, and appropriate laboratory analysis of collected samples 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.

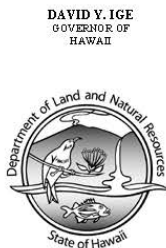
Aloha,



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)
Tessa Malama, HCDA (tesha.malama@hawaii.gov)

Figure 14. SHPD AMP acceptance letter, page 2.



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October 12, 2017

Jesse Souki, Executive Director
Hawaii Community Development Authority
517 Queen Street
Honolulu, HI 96813
Email: jesse.k.souki@hawaii.gov

IN REPLY REFER TO:
Log No.: 2017.02244
Doc. No.: 1710KM07
Archaeology

Dear Mr. Souki:

SUBJECT: **Chapter 6E-8 Historic Preservation Review –
Compliance for the Proposed Kalaeloa Solar Farm Project
Request for 2-Step Verification Process
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 request to resolve outstanding items related to the proposed Kalaeloa Solar Farm Project. The submittal includes the request and accompanying supporting document titled *Field Condition Assessment Inspection of All Sites and Component Features Previously Identified Within a Proposed Solar Farm in Kalaeloa, Honouliuli Ahupua‘a, ‘Ewa District, Island of O‘ahu, Hawaii‘i, TMK: (1) 9-1-013:070* (Kingsbury and Spear, July 2017). The submittal requests the State Historic Preservation Division's (SHPD) concurrence on three items: that the requirements of the 2012 Mitigation Plan have been addressed, revised mitigation recommendations for two sites from archaeological data recovery to preservation, and the implement the 2-step verification process. The SHPD received this submittal on October 9, 2017.

The HCDA and the Aloha Solar Energy Fund II (ASEF) are the project proponents; however, HCDA is the landowner. 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). The second component, the 12kV electric line, includes 9400 linear feet (18.32 acres) with a portion of Parcel 070 and the CSR ROW (State of Hawaii Department of Transportation) and will be installed parallel to CSR and eventually connect to a conduit near Roosevelt Avenue and Renton Road.

Pursuant to HRS §6E-8 and HAR §13-275-3(b)(1-5), HCDA and ASEF has completed the following five of the six historic preservation review procedural steps:

- (1) Identification and inventory to determine if historic properties are present and, if so, to identify and document them;
- (2) Evaluation of significance;
- (3) Effect determination;
- (4) Mitigation commitments; and
- (5) Detailed mitigation plan(s).

Figure 15. SHPD 2-step approval letter, page 1.

(1) Identification and Inventory

The original AIS (Medrano et al. 2014) for Parcel 070 documented a total of 23 historic properties (Sites 50-80-12-7483 through 7494, 7496 through 7504, 5119, and 5120). The SHPD accepted the archaeological inventory survey (AIS) for that portion of the project on February 25, 2014 (Log No. 2013.6641, 2014.00823, 2014.00528; Doc. No. 1402SL27).

An addendum survey (Kingsbury and Spear 2017) was recently completed for the 12kV corridor segment and identified no additional historic properties. The SHPD accepted the addendum survey on September 11, 2017 (Log No. 2017.01876, Doc. No. 1709KM03).

(2) Evaluation of Significance

Historic properties were assessed as significant per HAR §13-275-6 based on the following criteria: (a) Historic property reflects major trends or events in the history of the state of nation, (b) Historic property is associated with the lives of persons significant in our past, (c) Historic property is an excellent example of a site type, (d) Historic property has yielded or may be likely to yield information important in prehistory or history, and (e) Historic property has cultural significance to an ethnic group, including, but not limited to, religious structures, burials, and traditional cultural properties.

Pursuant to HAR §13-275-3(b)(2), the site significance evaluations for the identified historic properties are as follows:

- Sites 5119, 5120, 7484, 7485, 7487, 7488 through 7494, 7496 through 7504 were assessed significant under Criterion d (information potential) only; and
- Site 7483 and 7486 were assessed significant under Criteria d (information potential) and e (cultural or religious importance).

Sites 7483 and 7486 are two possible burials. However, based on community consultation at the time of the Medrano et al. (2014) survey, Sites 7483 and 7486 are considered human burials and significant under Criterion e. Furthermore, as of June 28 2017, the SHPD has recognized 27 cultural descendants to the possible burials. The project has had and continues to have consultation with all recognized descendants and other groups including the Office of Hawaiian Affairs (OHA), the 'Ahahui Siwila Hawai'i O Kapolei, and the Kalaeloa Heritage Park Advisory Group.

(3) Effect Determination

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.

Pursuant to HAR §13-275-3(b)(3), the project effect determination is "effect with proposed mitigation commitments".

(4) Mitigation Commitments

The original mitigation in response to a violation proposed included multiple components (October 31, 2012; Log No. 2012.2842, Doc. No. 1210SL42). The original 2012 Mitigation Plan included completion of an archaeological inventory survey plan (AISP), and installation of an interim fence on Parcel 070. As the current submittal indicates, neither the AISP or the interim fencing were completed. On February 16, 2017, the SHPD agreed that an after-the-fact AISP was not necessary. In consideration of the unfulfilled fencing mitigation and upon the request of the SHPD, a condition assessment of the sites was recently completed. The condition assessment (Kingsbury and Spear, July 2017) revisited all of the sites and features originally identified by Medrano et al. (2014), and assessed them for any visual damage. The condition assessment found

Figure 16. SHPD 2-step approval letter, page 2.

all sites and features virtually unchanged from the original documentation, save for Site 7487 Feature 2C (elements of a plane wreckage) for which the wing was observed turned over but undamaged.

The Medrano et al. (2014) survey originally provided mitigation recommendations of preservation for 21 of the 23 sites, data recovery for 2 sites (Site 7487 Features 2A-2C, Site 7502 Feature 1), and archaeological monitoring for the project. The SHPD concurred with the original mitigation recommendations on February 25, 2014 (Log No. 2013.6641, 2014.00823, 2014.00528; Doc. No. 1402SL27). The current submittal indicates that due to recent consultation with community groups and cultural descendants, and as the data recovery effort would potentially further damage Sites 7487 and 7502, preservation of all sites is preferred and data recovery is no longer desired. Pursuant to HAR §13-275-11(a), HCDA and ASEF are requesting revised mitigation commitments to retain monitoring for the project, and preservation for all sites with no data recovery component.

In addition to the above, the treatment of two possible burial sites (Sites 7483 and 7486) is addressed within a draft Burial Treatment Plan (BTP) (Kingsbury et al., September 2017). The draft BTP was submitted to SHPD on September 27, 2017 and is currently under review. The BTP was also submitted to the Oahu Island Burial Council (OIBC) for determination in October 2017. However, the OIBC did not have quorum and a determination of preservation or relocation could not be provided.

(5) Mitigation Plans

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 and Coral Sea Road ROW (por.) (Kingsbury et al. 2017). Accepted on October 6, 2017 (Log No. 2017.01876, Doc. No. 1710KM03).

(6) Verification of Completion

Pursuant to HAR §13-275-3(b)(6), HCDA and ASEF must submit verification of completion of the detailed mitigation plans required in Step 5 of the historic preservation review process. However, pursuant to HAR §13-275-9(d), in cases involving preservation, agencies may request an accelerated 2-step verification process. The current submittal includes the HCDA and ASEF request to implement this accelerated 2-step process.

- 1) Pursuant to HAR §13-275-9(d)(1), the HCDA and ASEF shall submit to SHPD documentation that interim protection measures (i.e. interim protection plan) shall be established prior to project construction commencing.
- 2) Pursuant to HAR §13-275-9(d)(2), the HCDA and ASEF shall submit to SHPD completion reports for final preservation work (i.e. final preservation plan, burial site component of a preservation or data recovery plan), and data recovery (i.e. archaeological monitoring report). SHPD requests that completion reports be provided within 180 days from conclusion of project construction.

The SHPD has reviewed the current submittal's information and the information provided above. The SHPD concurs with the following requests:

2012 Mitigation Plan closeout. SHPD acknowledges that an after-the-fact AISP is not required and that the condition assessment sufficiently demonstrated that the sites have not been adversely impacted by the lack of interim fencing. Additionally, final preservation measures will involve both interim and long-term protection for all 23 sites.

Revised mitigation commitments. From results of consultation efforts, pursuant to HAR §13-275-11(b), the SHPD agrees with the request to revise the original mitigation recommendations to archaeological preservation of all 23 sites, and retain archaeological monitoring for the project overall.

Figure 17. SHPD 2-step approval letter, page 3.

Mr. Souki
October 12, 2017
Page 4

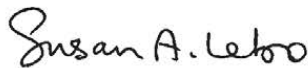
The SHPD accepted the AMP on October 6, 2017 (Log No. 2017.01876, Doc. No. 1710KM03). A draft BTP is also currently under review.

Implementation of the accelerated 2-step verification process: The revised mitigation commitments require preservation and archaeological monitoring and SHPD agrees to the accelerated 2-step process for the project. Pursuant to HAR §13-275-9(d)(1), for preservation, verification of interim measures must be completed.

Based on the above, the SHPD indicates that it has reviewed and commented on the effect of the proposed project pursuant to HRS §6E-8 and HAR §13-275-3. The SHPD has determined that HCDA and ASEF have completed Steps 1-5 of the historic preservation review process outlined in HAR §13-275-3(b)(1-5). The SHPD **concurs** that to complete Step 6 of the historic preservation review process, HCDA and ASEF shall implement the accelerated 2-step process and provide Items 1 and 2 listed above under (6) Verification of Completion.

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

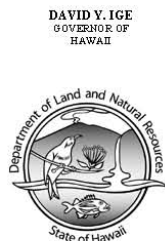
Aloha,



Susan A. Lebo, PhD
Archaeology Branch Chief

cc: Kawika McKeague, G70 (kawikam@g70.design)
Veronica Luttrell, ASEF (vluttrell@ecc.net)
Morgan Davis, SCS (morgan@scshawaii.com)
Nigel Kingsbury, SCS (nigel@scshawaii.com)

Figure 18. SHPD 2-step approval letter, page 4.



DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
KAKUHIHEWA BUILDING
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SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
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DEPUTY DIRECTOR - WATER

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HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

November 27, 2017

Jesse Souki, Executive Director
Hawaii Community Development Authority
517 Queen Street
Honolulu, HI 96813
Email: dbedt.hcda.contact@hawaii.gov

IN REPLY REFER TO:
Log No.: 2017.02440
Doc. No.: 1711KM03
Archaeology

Dear Mr. Souki:

SUBJECT: **Chapter 6E-8 Historic Preservation Review –
Interim Preservation Plan for Multiple Sites on HCDA-owned Parcel in Kalaeloa
Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu
TMK: (1) 9-1-013:070**

Thank you for the opportunity to comment on the draft plan titled *Interim Preservation Plan for Multiple Sites on HCDA-owned Parcel in Kalaeloa, Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu, TMK: (1) 9-1-013:070* (Davis et al. October 2017). The State Historic Preservation Division (SHPD) received this submittal on November 1, 2017 and requested minor revisions on November 4, 2017. The revised plan was received via email on November 14, 2017 (Davis [Scientific Consultants] to Matsushima [SHPD]).

This interim preservation plan (IPP) was prepared on behalf of the Hawaii Community Development Authority (HCDA) and the Aloha Solar Energy Fund II (ASEF). The HCDA and ASEF are the project proponents and the HCDA is also the landowner. The IPP was also prepared in support of completing the historic preservation review process through an accelerated 2-step process. The SHPD acknowledged that the project has successfully completed Steps 1-5 of the historic preservation review process and concurred with HCDA's request to implement the accelerated process on October 12, 2017 (Log No. 2017.02244, Doc. No. 1710KM07).

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). The second component, the 12kV electric line, includes 9400 linear feet (18.32 acres) within a portion of Parcel 070 and the CSR ROW (State of Hawaii Department of Transportation) and will be installed parallel to CSR and eventually connect to a conduit near Roosevelt Avenue and Renton Road.

The IPP provides an overview of the project history, consultation, and outlines interim protection measures for the preservation area. The IPP stipulates the following conditions:

- 1) Buffers shall consist of survey pins delineating the buffer boundary and a caution tape barrier of two rows: one at 5 ft. height, and one at 3 ft. height;
- 2) A 10 ft. permanent buffer shall be established around all sites and features;
- 3) An additional 10 ft. interim buffer shall be established around all sites and features (except Site 7501) for the duration of project construction, effectively a 20 ft. buffer;
- 4) Site 7501 shall have a 10 ft. permanent buffer and a 7 ft. interim buffer during construction, effectively a 17 ft. buffer;
- 5) All buffer zones shall be surveyed and added to all construction plans;

Figure 19: SHPD acceptance of IPP, page 1.

- 6) The archaeological monitor and/or the ASEF II site supervisor shall inspect all buffers on a regular basis;
- 7) The archaeological monitor shall be present for any ground altering activity within the Parcel 070;
- 8) No work shall be permitted within the interim or permanent buffer zones;
- 9) The interim preserve area shall be off limits to heavy machinery, most project related ground disturbance, and most construction personnel;
- 10) The interim preserve area shall be off limits for storage of equipment or supplies, and parking;
- 11) Any vegetation clearing within the interim preserve area shall be monitored and SHPD shall be notified of the proposed work;
- 12) The interim preserve areas shall generally be off limits except to recognized cultural descendants on a prearranged basis, the archaeological monitor, the landowner, ASEF II project management, and assigned personnel with specific duties;
- 13) The other construction personnel may access the interim preserve when accompanied by the archaeological monitoring for the creation of the pathway and firebreak; and
- 14) The monitor shall report any damage that occurs to the sites, features, or interim preserve whether the result of natural or other activity.

Based on the above information, the IPP satisfies Item 1 listed in Section (6) Verification of Completion in our previous correspondence (October 12, 2017; Log No. 2017.02244, Doc. No. 1710KM07).

Although the IPP does not meet the requirements of a preservation plan under Hawaii Administrative Rules (HAR) §13-277, it facilitates the completion of the historic preservation review process under the accelerated 2-step pursuant to HAR §13-275-9(d)(1). **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.

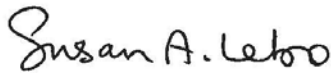
Pursuant to HAR §13-275-9(d), the HCDA and ASEF may proceed with project work with the following conditions:

- Verification of the implementation of the interim protection measures described above; and
- Archaeological monitoring shall be conducted for the duration of the project work and be guided by the SHPD-accepted monitoring plan (*Archaeological Monitoring Plan for the Proposed Solar Farm In Kalaehoa, Honolulu Ahupua'a, Ewa District, Island of O'ahu, Hawai'i, TMK: (1) 9-1-013:070 and Coral Sea Road ROW (por.)* [Kingsbury et al. 2017]; October 6, 2017; Log No. 2017.01876, Doc. No. 1710KM03).

SHPD looks forward to receiving an archaeological monitoring report meeting the requirements of HAR §13-279-5, and a preservation plan meeting the requirements of HAR §13-277 to complete the historic preservation review process.

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)
Veronica Luttrell, ASEF (vluttrell@ecc.net)
Morgan Davis, SCS (morgan@scshawaii.com)
Nigel Kingsbury, SCS (nigel@scshawaii.com)

Figure 20: SHPD acceptance of IPP, page 2.



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION
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December 18, 2017

SUZANNE D. CASE
CHAIRPERSON
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ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
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ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAIKOOLOAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Mr. Jesse Souki
Executive Director, Hawaii Community Development Authority
547 Queen Street
Honolulu, HI 96813
dbedt.hcda.contact@hawaii.gov

Log NO: 2017.02484
DOC NO: 1712RKH05

Aloha mai kua,

SUBJECT: DRAFT Burial Treatment Plan for Two Burial Locations, SIHP #50-80-12-7483 Feature 4 and SIHP 50-80-12-7486 Feature 2, within a proposed Archaeological Preserve for the Aloha Solar Energy Fund II Project (ASEF II) on a Hawaii Community Development Authority parcel, in Kalaeloa, Honouliuli Ahupuaa, Ewa District, Oahu Island, TMK: [1] 9-1-013:070

At its meeting on October 25, 2017, the O'ahu Island Burial Council (OIBC) made the determination that the above SIHP features shall be preserved-in-place. Additionally, the OIBC recommended that the State Historic Preservation Division (SHPD) accept the DRAFT Burial Treatment Plan.

Following the recommendation of the OIBC, the DRAFT Burial Treatment Plan for Two Burial Locations, SIHP #50-80-12-7483 Feature 4 and SIHP 50-80-12-7486 Feature 2, within a proposed Archaeological Preserve for the Aloha Solar Energy Fund II Project (ASEF II) on a Hawaii Community Development Authority parcel, in Kalaeloa, Honouliuli Ahupuaa, Ewa District, Oahu Island, TMK: [1] 9-1-013:070, is accepted by the SHPD. Please change the title from DRAFT to FINAL, submit the FINAL plan to the SHPD's Kapolei office, and include a text-searchable PDF electronically or a CD copy with your submission.

Contact the Oahu Burial Sites Specialist, Ms. Regina K. Hilo, if you have any questions and/or concerns via email at: Regina.Hilo@hawaii.gov.

Na'u no,

Hinano Rodrigues

Hinano Rodrigues, J.D.
History and Culture Branch Chief
State Historic Preservation Division

CC: Mr. Kawika McKeague, G70
Ms. Morgan Davis, SCS

Figure 21: SHPD acceptance of BTP.

APPENDIX B: BURIAL SITE COMPONENT OF A PRESERVATION PLAN

**BURIAL SITE COMPONENT OF A PRESERVATION PLAN
FOR TWO BURIAL LOCATIONS WITHIN A PROPOSED
ARCHAEOLOGICAL PRESERVATION PRESERVE AT A PROPOSED
SOLAR FARM IN KALAELOA
HONOUILIULI AHUPUA`A, `EWA DISTRICT,
ISLAND OF O`AHU, HAWAII
TMK: (1) 9-1-013:070 (por.)**

Prepared by:
**Nigel T. Kingsbury, B.A.,
Emily Johnston-O'Neill, B.A.
Alexander D. Hazlett, Ph.D.,
and
Robert L. Spear, Ph.D.**
November 2020
Final

Prepared for:
**Aloha Solar Energy Fund II, LLC
91-1810 Coral Sea Road
Kapolei, HI 96707**

**On Behalf of Land Owner
Hawai'i Community Development Authority
547 Queen Street, Honolulu Hawaii 96813**

SCIENTIFIC CONSULTANT SERVICES Inc.



1357 Kapiolani Blvd., Suite 850

Honolulu, Hawaii'i 96814

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INTRODUCTION

Scientific Consultant Services (SCS), Inc. has prepared this Burial Site Component of a Preservation Plan (BSCPP) in advance of construction for a proposed 5.0 megawatt solar farm power facility in Kalaeloa on an approximately 44-acres of undeveloped land, an area currently owned by the Hawai'i Community Development Authority (HCDA). The burial mounds are located within a portion of a parcel located in Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu, Hawai'i [TMK: (1) 9-1-013:070] (Figures 1 through 3). The proposed project would involve the installation of approximately 23,500, 72-cell PV modules mounted on elevated galvanized steel racks, which will be mounted to concrete posts or piers on approximately 22 acres. Power will be transferred from the modules to five inverters and transformers to a switchyard that will connect to HECO's system. The remaining portion of the parcel will be dedicated as future archaeological preserve.

The burial mounds are located east of the Kalaeloa Airport on the former United States Naval Air Station Barbers Point.

The burial mounds were previously identified during an Archaeological Inventory Survey (AIS) by SCS (Medrano et al. 2014). The AIS was conducted to identify and document historic properties, to assess their historical significance, evaluate eligibility for listing on the Hawaii Register of Historic Places, to provide a project effect recommendation, and to make mitigation recommendations. AIS fieldwork was conducted February through April of 2013.

The AIS (Medrano et al. 2014) documented 23 historic properties (State Sites 50-80-12-5119, -5120 and 50-80-12-7483 through 50-80-12-7504) comprised of 146 features. Of the 146 features documented by Medrano et al. (2014) two features, State Site 50-80-12-7483 Feature 4 and 50-80-12-7486 Feature 2, were identified as possible burial mounds. The archaeological identification of these features as possible burial mounds was predominately based on comparable analysis between these mounds and other known burial mounds in Kalaeloa. Cultural knowledge provided through consultation to led to these being formally characterized as burials. Based on the archaeological evidence that these mounds possibly functioned as burial mounds and the cultural knowledge assertion that they were burial mounds, it was decided that the examination of exterior characteristics was sufficient for this determination.

Consultation with project proponents; HCDA; the State Historic Preservation Division, Archeology Branch and History and Cultural Branch; the O'ahu Island Burial Council; the Kalaeloa Heritage Park advisory group; and the 'Ahahui Siwila Hawai'i o Kapolei, resulted in a recommendation to not perform subsurface testing to confirm the presence of human remains. The Oahu Island Burial Council (OIBC), at the recommendation of the State Historic Preservation

Division (SHPD), recognized 22 cultural descendants on December 11, 2013, one additional cultural descendant on July 9, 2014, and four additional cultural descendants on June 28, 2017, to the burials located within TMK: (1) 9-001-013:070. Pursuant to Hawaii Administrative Rules (HAR) §13-300-31, both State Site 7483 Feature 4 and State Site 7486 Feature 2 were determined to be previously-identified burial sites. Originally, the plan for the protection of the burials was written as a Burial Treatment Plan (BTP), and the description of the consultation process in this document refers to a BTP, which was prepared as a request to the OIBC to approve preservation in place for State Sites 50-80-12-7483 Feature 4 and 50-80-12-7486 Feature 2. However, after consultation with SHPD, and in accordance with HAR §13-300-33, the final plan is submitted as a BSCPP

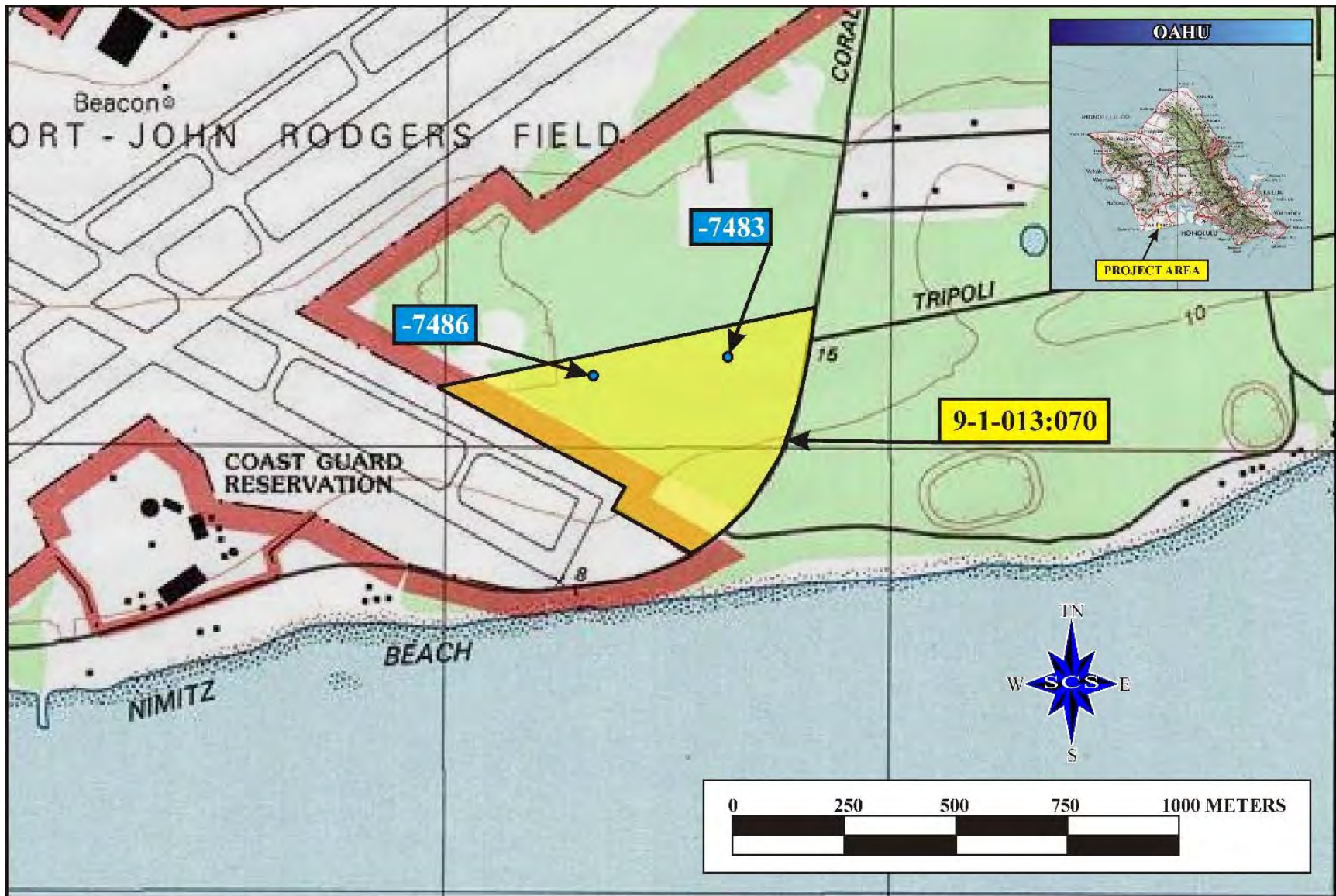


Figure 1: 1983 USGS 7.5' Ewa Quadrangle Map showing the approximate location of the burial mounds in blue.

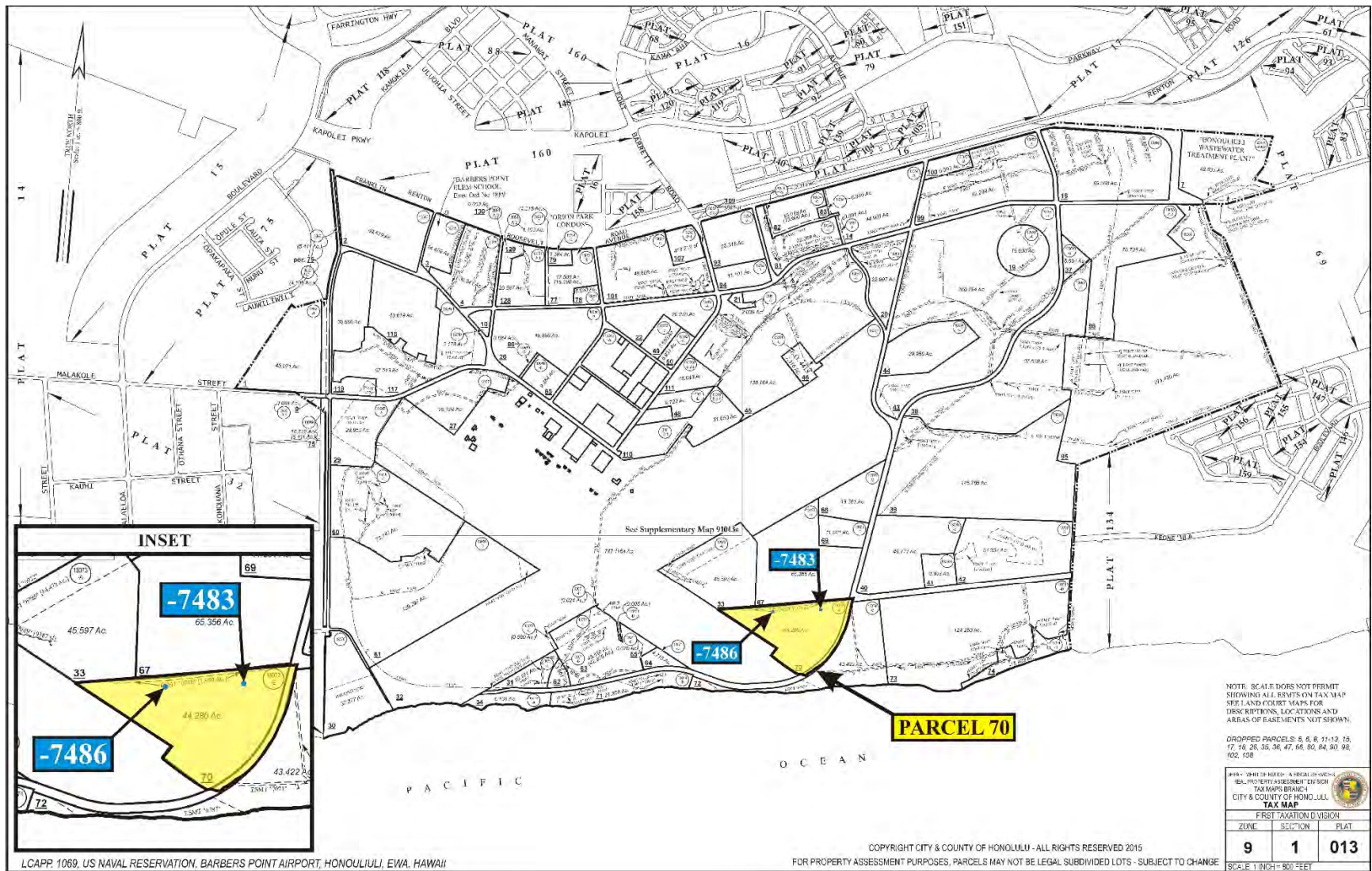


Figure 2: Tax Map Key (1) 9-1-013 showing the approximate location of the burial mounds in blue.



Figure 3: 2013 Google Earth Aerial Image showing the approximate location of the burial mounds in blue. Note not to scale.

ENVIRONMENTAL SETTINGS

BURIAL SETTINGS

The burials are located approximately 110 m north of the `Ewa coastline at an elevation to 12 meters (m) above mean sea level (amsl). Located in Honouliuli Ahupua`a, `Ewa District, Island of O`ahu, Hawai`i [TMK (1) 9-1-013:70] (see Figures 1 through 3), and are located on the former Naval Air Station (NAS) Barbers Point. The burials are just south of Tripoli Street, and west of Coral Sea Road.

SOILS

According to Foote *et al.* (1972:29, Sheet Map 45), the burial mounds are situated in an area primarily comprised of Coral outcrop (CR) series. “Coral outcrops consist of coral or cemented calcareous sand on the Island of O`ahu. The coral reefs formed in shallow ocean water during the time the ocean stand was at a higher level. Small areas of coral outcrop area exposed on the ocean shore, on the coastal plains, and at the foot of the uplands” (Foote *et al.* 1972:29).

Coral outcrop makes up about 80 to 90 percent of the acreage with the remaining 10 to 20 percent consisting of a thin layer of friable, red soil material in cracks, crevices, and depressions within the coral outcrop, similar to that of Mamala series deposits (Foote *et al.* 1972:29). Mamala Series deposits consist of shallow, well drained soils along the coastal plains on the island of O`ahu. These soils formed in alluvium deposited over coral limestone and consolidated calcareous sand. This land type is used for military installations, quarries, and urban development (Foote *et al.* 1972:93).

THE MĀHELE

Kamehameha's successful conquest of O`ahu had resulted in a large-scale redistribution of lands which set the stage for an ongoing series of land sales and transfers of ownership. Honouliuli Ahupua`a was originally given as *punala`au* (conquered land) to Kalanimoku (Kame`eleihiwa 1992:58, 112). Subsequently, Kalanimoku gave this land to his sister Wahinepi`o, whose daughter Kekau`onohi in turn received the land during the Māhele of the late 1840s (LCA 11216; Royal Patent 6971) (Waihona `Aina Corporation 2013).

Although no lands were awarded within the Barber's Point area, 96 individual claims were made in the *ahupua`a* of Honouliuli and, of these, 72 individual claims were registered and awarded by King Kamehameha III to commoners (Tuggle and Tomonari-Tuggle 1997:34). The 72 *kuleana* awards were mainly adjacent to Honouliuli Gulch which contained fishponds and irrigated taro fields. Soil suitable for cultivation was rare in the upland portions of Honouliuli

where small soil pockets are distributed unevenly. Irregularly located sinkholes and small gulches often served to catch soil deposition appropriate for limited gardening activity. Stone mounds were also prepared for the cultivation of sweet potato in dryer areas (McAllister 1933:109)

BURIAL FEATURE DESCRIPTIONS

STATE SITE 50-80-12-7483

State Site No. 50-80-12-7483 was a newly identified site during the AIS as a multi-functional complex consisting of 10 features. State Site 50-80-12-7483 measures 69.5 by 9.0 m and is oriented along a northeast/southwest axis with a compass bearing of 43/223 degrees (Magnetic) (Figure 7). Features include six karst pits, three agricultural mounds, and one rock mound containing a human burial. Based on feature types and functions, State Site 50-80-12-7483 was interpreted as an agriculture/refuse complex with a possible burial component and was found to be in good condition and interpreted as associated with the pre-Contact to early post-Contact Period. State Site 50-80-12-7483 has been evaluated for significance, as outlined in Hawai'i Administrative Rules §13-275-6, and found to be significant under Criterion d, for information content; and under Criterion e, for its importance to Native Hawaiians. Archaeological subsurface testing was not conducted during the AIS.

Feature Type: Rock Mound

Feature: 4

GPS Coordinates: E 597659 N 2356148

Function: Burial Mound

Age: Pre-Contact to early Post-Contact

Condition: Good

Description: State Site 50-80-12-7483, Feature 4 consists of an irregular, oval-shaped limestone mound (Figures 4, 5, and 6) with surface feature dimensions of 2.8 m long x 1.9 m with a maximum height of 48 cm above surface. The long axis of the feature is oriented northeast/southwest (75°/255°, Magnetic).

The feature is constructed of dry-laid limestone cobbles and small boulders. The cobbles are sub-rounded and angular, while the boulders are sub-rounded and sub-angular. Both cobbles and boulders are piled no more than five courses high, with the cobbles and boulders being interspersed. Feature 4 exhibits minor collapse portions along its perimeter.

The feature type, construction methods, and construction materials (large size of cobbles and boulders), suggests Feature 4 may contain a human burial. This mound is much larger in breadth than typical agricultural mounds occurring in the area. Given the assumed temporal association of the adjacent sites and features in the area, Site -7483, Feature 4 was interpreted as associated with the pre-Contact to early post-Contact Period during the AIS.

PLAN VIEW OF SITE -7483, FEATURE 4 (BURIAL MOUND)

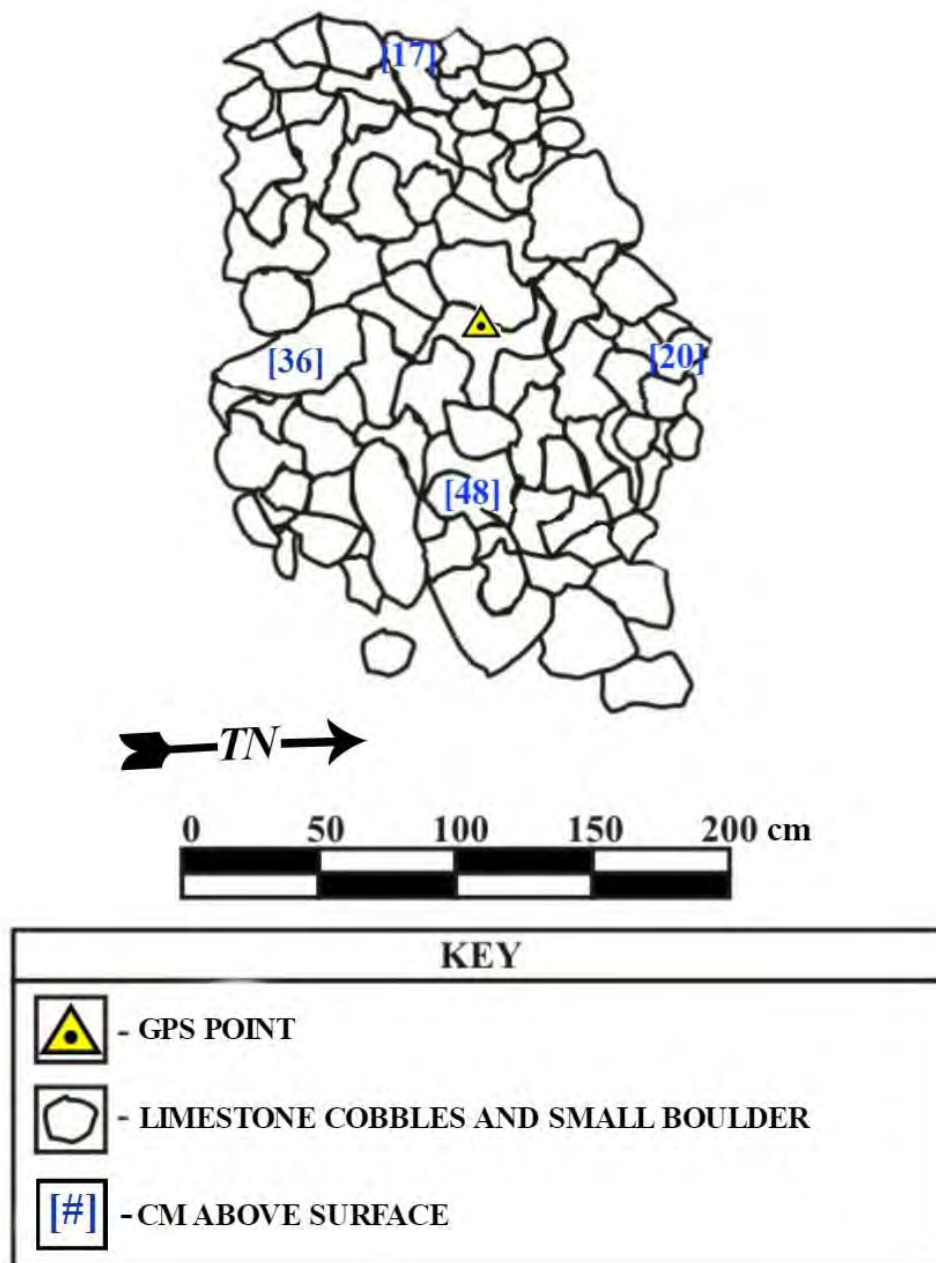


Figure 4: Plan View Drawing of State Site 50-80-12-7483, Feature 4.



Figure 5: Photographic View of State Site 50-80-12-7483, Feature 4. View to Southwest.

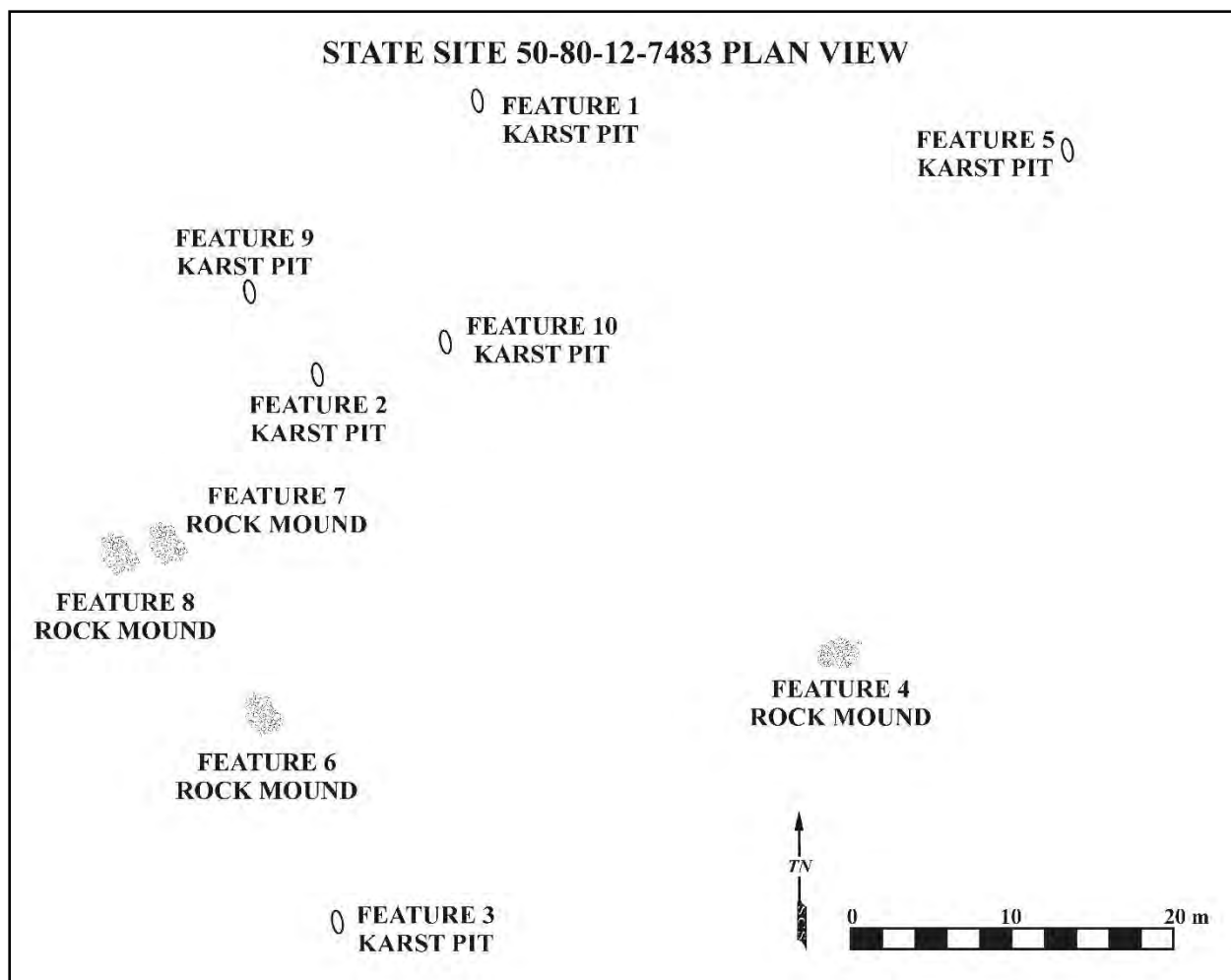


Figure 6: Plan View Drawing of State Site 50-80-12-7483.

STATE SITE 50-80-12-7486

State Site 50-80-12-7486 was a newly identified site consisting of five features: a walled karst pit, a possible burial mound, two karst pits, and a linear trail segment (Figure 10). State Site 50-80-12-7486 measures 47.5 by 30.5 m and is oriented along a northeast/southwest axis with a compass bearing of 34/214 degrees (Magnetic). Based on feature types and construction methods and materials, State Site 50-80-12-7486 was interpreted as an agriculture/ refuse/ storage/ travel/ ranching complex, with a possible burial component. Based on feature type, Site -7486 was interpreted as associated with the pre- and/or early post-Contact Period. Site 50-80-12-7486 has been evaluated for significance, as outlined in Hawai'i Administrative Rules §13-275-6, and found to be significant under Criterion d, for information content, and also significant under Criterion e due to the potential presence of a burial. State Site 50-80-12-7486 was found to be in fair condition. Given the feature types identified and that archaeological subsurface testing was not conducted of Features 2 through 5, the unexcavated features may contain additional cultural information in subsurface contexts. Thus, a recommendation of preservation has been made for all five features of State Site 50-80-12-7486, including Feature 2, a burial mound.

Feature Type: Rock Mound

Function: Possible Burial Mound

Feature: 2

GPS Coordinates: E 597358 N 2356112

Age: Pre-Contact to early post-Contact

Condition: Fair

Description: State Site 50-80-12-7486, Feature 2 consists of an oval-shaped limestone mound (Figures 8, 9 and 10) with surface feature dimensions of 2.4 m long x 1.8 m wide, and a maximum height of 70 cm above surface. The long axis of the feature is oriented northeast/southwest (40/220 degrees, Magnetic). The feature was constructed with dry-laid limestone cobbles and small boulders. The cobbles and small boulders are sub-rounded and angular in shape. Both the cobbles and boulders are piled no more than five courses high. The small boulders are located around the perimeter, while the cobbles are located within the interior of the feature. Several uprights were used in feature construction, extending to 0.50 m above surface and located in the north, central, and southern portions of the feature. The feature exhibited collapsed portions along the west/southwest perimeter and in the center. Although Site -7486, Feature 2 exhibited the effects of root wedging of a *kiawe* tree, the feature was found to be in fair condition. Based on feature type, construction methods, construction materials, and collapsed center, Site -7486, Feature 2 was

interpreted as a possible burial feature associated with the pre-Contact to early post-Contact Period. This mound is greater in breadth and is more substantial in construction than agricultural mounds in the area.

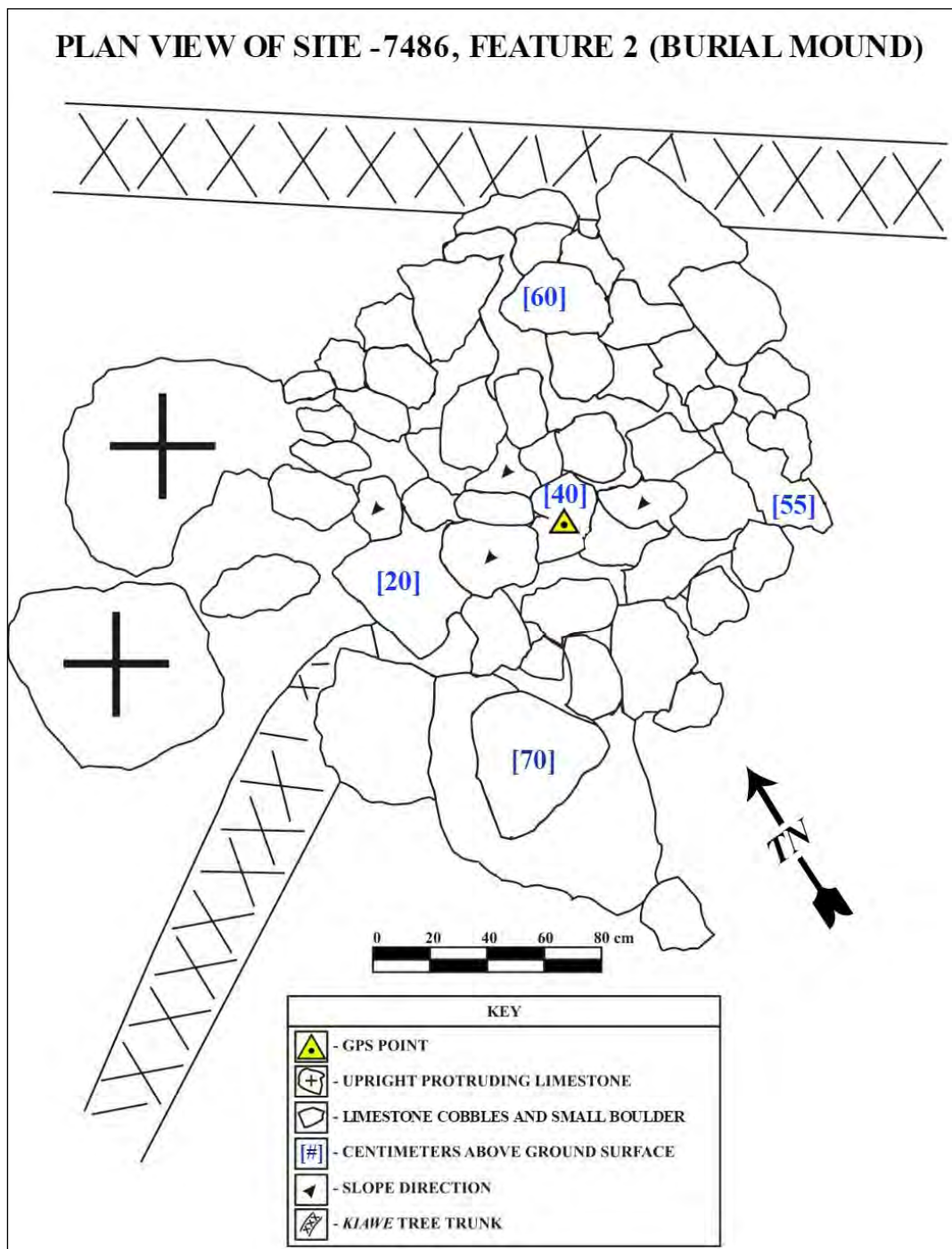


Figure 7: Plan View Drawing of State Site 50-80-12-7486, Feature 2.



Figure 8: Photographic View of State Site 50-80-12-7486, Feature 2. View to East.

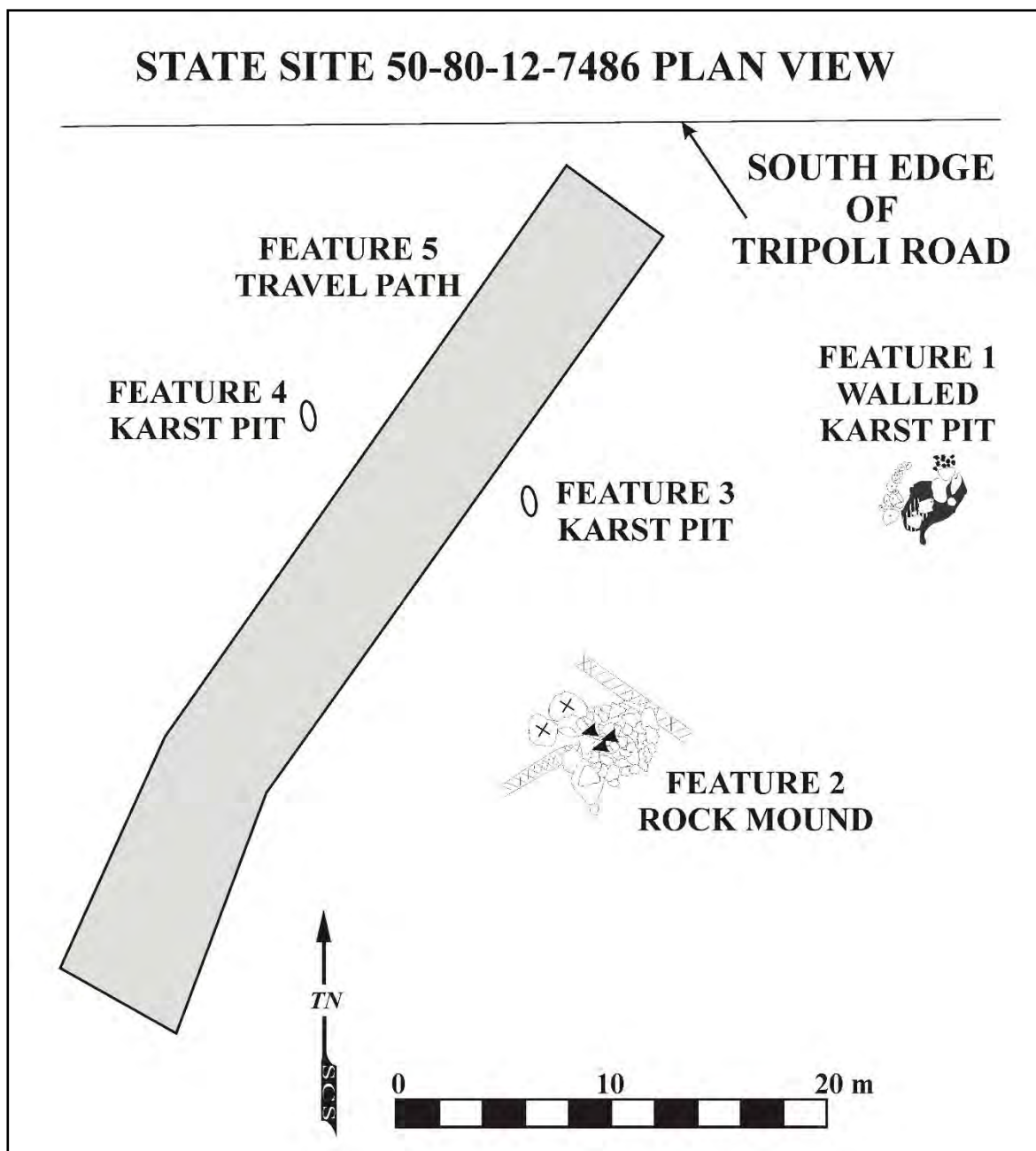


Figure 9: Plan View Drawing of State Site 50- 80-12-7486.

GOOD FAITH SEARCH AND CONSULTATION SUMMARY

Scientific Consultant Services have completed a thorough background search of the land parcel containing the two burial mounds including historic land use and land title history in order to ascertain the identity of possible lineal descendants or cultural descendants. The results of the land title history research suggest that the entire Honolulu Ahupua'a was granted to Mikahela Kekauonohi. However, no documented LCA awards were awarded within four miles of the burial mounds. Advertisements were published in the Ka Wai Ola and the Hawaii Star-Advertiser (Figures 12 and 13).

O'AHU ISLAND BURIAL COUNCIL

The O'ahu Island Burial Council (OIBC) recognized Cultural descendants for the two possible burial mounds on December 11, 2013. The cultural descendants named at that meeting are as follows:

Paulette Kaanohiokalani Kaleikini, Moani Umiaimoku Kaleikini,
Tuahine Kanekapolei Kaleikini, Kala Waahila Kaleikini,
Kalahikiola Mahikeahi Keliinoi, Kilinahe Ialuamoku Keliinoi,
Aliikaua Keawenuiaumi Kaleikini, Noeau Kamehanaokala
Kaleikini, Haloa Kekoo Namakaokalani Kaleikini, Mahiaimoku
Kekaulike Kaleikini, Moehonua Keaweamahi Kaleikini, Jim
Medeiros Senior, Michael Lani Keaweamahi, April Leimomi
Keaweamahi, Shanlyn Maile Keaweamahi Kanohokula, Brandy
Kalehua Kamohalii Caceres, Norman "Mana" Christopher Moore
Kaleilani Caceres, Kekamamakoakailihou Kaleilani Kamohalii
Caceres, Keahealaiianiikekamaehuokahikiku
Kiekiekananiokuuleilehua Kamohalii Caceres,
Kekamakeuakauikuhaikalai Kalehuahiehie Kamohalii Caceres,
JR Keonekapu Williams, Kimball Kekaimalino Kaopio.

On July 9, 2014, the OIBC recognized Michael Kumukauoha Lee as a cultural descendant. Furthermore, On June 28, 2017, the OIBC recognized four additional cultural descendants as named below:

Piilani Keonealoha Kaleikini, Kahekilinuiahumanu Ulukou Kaleikini, Heulu Kuaialii Kaleikini, and Lawakua Huanuikalalailai Kaleikini.

On October 9, 2013, Group70 gave a PowerPoint presentation on the completed (then in draft) AIS fieldwork. The following are notes from the OIBC's October 9, 2013 Meeting:

Wong-Kalu reminded the public and council members that no discussion was permitted and only testimony would be heard as the council no longer had quorum.

Scheuer said his wife worked for Group 70 (G70) as a consultant for the project and recused himself.

Jeff Overton of G70 introduced himself, Matt Blake of Aloha Solar Energy, Kamolei Wilhelm and Lani Kaanana. Overton said Scientific Consultant Services (SCS) was the project's archaeological consultant and introduced Guerin Tome and Mike Dega. Overton thanked council member Kane for his help with the project as well. Overton went over a PowerPoint presentation. The project proposed to construct a solar farm on 44 acres in the Kalaeloa area under the control of HCDA (Hawaii Community Development Authority). The project completed an AIS as part of the project's environmental assessment. A lot of consultation was involved with development of the AIS. The AIS identified 23 sites consisting of 96 features within the project area. The AIS also identified two burial mounds. No invasive testing occurred as a result of consultation with cultural advisors and community members. Government agencies also concurred with the recommendation to not conduct invasive testing. The burial mounds are slated for preservation in place. Other sites identified during the AIS would be mitigated in consultation with community members and SHPD. Overton expected the project would appear before the council early 2014 to formally present the BTP.

Kane commended the archaeological work completed for the project.

May 14, 2014 Kawika McKeague of G70 on behalf of HCDA (landowner) and ASEF (project proponent) conducted a presentation of the accepted AIS at the OIBC.

CULTURAL DESCENDANT MEETINGS

On November 17, 2014, G70 conducted a cultural descendants meeting at the Department of Hawaiian Home Lands Hale Pōno‘i. Cultural descendants that participated are as follows:

Ryan McCauley, Tesha Malama, Kawika McKeague, Lani Ma‘a Lapilio, Kilinahe Keliinoi, Moani Kaleikini, Jerome Yasuhara, Shad Kane, Mike K. Lee, Mana Kaleilani Caceres, Kalehua Caceres, Kaanohi Kaleikini, Kala Kalekini, and Kehau Kaleikini.

The following are notes taken during the meeting:

Everyone agree to protect and preserve burials in-place as part of a larger archaeological preserve.

Provide perimeter fencing – maybe minimal signage – concern about trespassers and people who would seek to do harm to the area.

Maintain kiawe thicket to some degree as a natural barrier of protection.

Mr. Michael Lee inquired as to how we plan to address the inclusion of information he gave to Kawika that shows an interpretation of one site that is different than the accepted interpretation the site in question under the approved AIS. In short, Mr. Lee’s version suggests that agricultural mounds that were identified in the AIS are actually a concentration of burials. Kawika replied that limited testing was done in some of these features with no significant finds. Kawika highlighted that this information could be provided or cited in the BTP or APP. Mr. Lee wanted it on record.

General maintenance and clean-up around the site. Uncle Shad stated that it is the Civic Club’s belief that these burials are not as old as some people think (like 1800s). Auntie Paulette suggested these are reminiscent of burials at Makua and parts of Kona and those are much older. Age of the burials not a major issue. Although Base Realignment and Closure (BRAC) consultations identified the Kapolei Civic Club as the “must consult” party, Auntie Paulette voiced her *mana‘o* (opinion) that the care of the burials should be the responsibility of descendants moving forward. In this conversation, the use of cultural monitoring was inquired by Mr. Michael Lee.

An access route could be determined so maybe the fence needs a locked entry gate that could be used from time to time to access the burial(s). Maybe maintain a small access trail only known to folks that need to know. Should conduct periodic inspections of the burials and other significant sites (at least annually).

If data recovery were to be conducted for any non-burial related features on the parcel, the descendants preliminarily agreed to the use to the use and maintenance of pōhaku [rocks] and lepo [soil] on site for some yet-to-be determined cultural use.

G70 to provide a digital copy of the SCS AIS to all cultural descendants.

G70 also held a cultural descendant meeting on April 10, 2017 at Kapolei Heritage Center Classroom II. People and cultural descendants present at this meeting are as follows:

Kilinahe Keliinoi, Kala Keliinoi, Aliikaua Kaleikini, Ka'anohi Kaleikini, Mike Lee, Mike Dega, Mana Caceres, Kalehua Caceres, Makoa Caceres, Hiehie Caceres, Kamana Caceres, Kawika McKeague, Ryan McCauley, Lani Ma'a Lapilio.

The following are the notes recorded from that meeting as they pertain to the burial treatment plan:

ML: Information about the Malden trail? Please refer to it by the Hawaiian name. It should be identified to protect G70 to show that even though federal laws do not apply they took all into consideration.

ML: What is the depth of the excavation?

ML: Did the Tuggles do any of the work in the area?

ML: Pointed out spot where iwi was found in the 70's however not in project area (DOT kuleana).

ML: Requested buffers around the sites for protection so we can malama the resources citing several examples of hana'ino behavior.

ML: Who should the descendant request to get access to the sites?

ML: Have a plan B for incursion incidents.

Kala: Is there any Jaucus sand?

ML: Requested a hard hat tour for the descendants when possible.

ML: Signage is necessary. Would like a natural or physical barrier and a firebreak.

Ka'anohi Kaleikini: I just want the sites protected. Once that happens, I have no need to go nīele.

General agreement that G70 plan as presented was maika'i.

On September 5, 2017, G70 held a site visit and cultural descendant meeting to discuss the draft BTP and to allow descendants a chance to see the burial mounds. Attendees at the site visit and meeting are as follows:

Ka'anohi Kaleikini (recognized cultural descendant), Kilinahe Keliinoi (recognized cultural descendant), Mike Lee (recognized cultural descendant), Mana Caceres (recognized cultural descendant), Kalehua Caceres (recognized cultural descendant), Kamana Caveres (recognized cultural descendant), Tesha Malama (HCDA), Kawika McKeague (G70), Lauren A. Esaki-Kua (G70), Lani Ma'a Lapilio, Nigel T. Kingsbury (SCS), Regina Hilo (SHPD),

Site visit began at 5pm with attendees gathering at the intersection of Tripoli Road and Coral Sea Road. Mike Lee offered pule before entering the site. All site participants signed an ASEF/ECC waiver form before entering the premises.

At State Site #- 7483 Feature 4 concerns were raised that a large kiawe tree currently leaning significantly over the feature may be a problem in future.

Kawika asked group what they think may be a good mitigation measure for this tree?

Mike Lee offered the idea of a brace.

Mana Caceres mentioned heavily trimming the tree to remove weight from the tree.

Aunty Ka'anohi agreed with both. She also asked if the age of the tree was known. Kawika replied he did not.

Nigel then guided the attendees to the second burial mound, State Site # -7486 Feature 2. No concerns were raised regarding Feature 2.

The group moved to the Kapolei Heritage Center after the site visit (Approximately 6:20 pm) for the post site visit meeting regarding the draft BTP.

Kawika started the meeting with an open question to the group regarding what they observed during the site visit to the burial locations. Specifically, if there were any concerns about the care and protection of the two sites for preservation in-place.

Kawika brought up the BTP interim measures (Slide in PowerPoint).

Kawika discussed Long Term Operational Measures (PowerPoint Slide).

Kawika asked the attendees – do we need a road/ path on the inside perimeter of the proposed property fence along Tripoli and Coral Sea Road to descendants to access? Is the two-week notification request for descendants access okay with everyone? What do you folks think? No immediate response so Kawika told the group to think on it and respond later.

Mike Lee said that Maiapilo; white flower blooms at night, smells sweet and is located nearby might be a good choice to plant around the burial mounds. The Kupuna might enjoy that. “Something nice for them”. Grows under kiawe trees and is good in arid conditions. Rest of the group did not seem adverse to possible landscaping plantings to be done. This would need to be mentioned in the BTP as a possible recommendation. Mike Lee also mentioned wiliwili tree as suitable too. Mike Lee offered to show where the preserve is up north as they have lots of maiapilo there.

Kawika asked group if they had a desire for minimal landscaping? No answer.

Kawika presented PowerPoint slide about Long Term Operational Measures.

Kawika informed attendees that the project is not yet approved. The project still needs a Final EA & FONSI; and the completion of HCDA specific permit approvals. There are a few more steps to go before finalizing. However, even if the project never gets done HCDA has agreed that the Preservation Plan (and the included BTP) will be finalized.

Kawika asked if there were additional comments or concerns.

Kawika asked group if they had a desire for minimal landscaping?

To which the group did not respond.

Kawika presented PowerPoint slide about Long Term Operational Measures.

Kawika informed attendees that the project is not yet approved. The project still needs a Final EA & FONSI; and the completion of HCDA specific permit approvals. There are a few more steps to go before finalizing. However, even if the project never gets done HCDA has agreed that the Preservation Plan (and the included BTP) will be finalized.

Kawika asked if there were additional comments or concerns.

Mike Lee asks about a fire management plan. Mike Lee – what is the plan if somebody calls 9-1-1 fire fighters come and clarifying what happens. Can HCDA get fire easement for Tripoli Road? Tesha states if there is a fire the State Crash Unit responds to all calls around the airport. Tesha says there are already lockboxes on all of the cattle gates with

keys inside to allow access in cases of emergencies. Tesha notes that both City Fire and Crash Units arrive.

Mike Lee – Would the property have an access gate off of Tripoli to allow fire fighters to gain access in to the preserve area? Tesha states that HCDA has always had access issues with people dumping etc. afraid access areas only make more points of illegal entry. Tesha states that if the Fire crews need access they will make their own access no matter what. Mike Lee mentioned locks he has seen in Maui on gates. These are thick metal boxes built on to the gates that fit locks very tight. So, bolt cutters can't get in. helps strengthen this part of a fence too. Project team will continue to work with HCDA on addressing concerns relative to project site safety and access that are separate from burial protection measures. The location of the burials within the interior portion of the proposed preserve provides a natural barrier.

Kawika asks again about interior access as part of long term maintenance?

Aunty Ka'anohi would rather not have a formal access as it may encourage unnecessary attention and nīele behavior.

Mike Lee asks if the preservation area will be filed with the Bureau of Conveyances?

Tesha and Kawika state a unanimous yes.

Kawika laid out project schedule (PowerPoint Slide).

Kawika informed group that the BTP would be presented to the OIBC next week.

Kawika asked if anyone had any issues with the BTP?

Aunty Ka'anohi said it is fine.

Mana agreed that it was good.

Kawika expressed that he wanted to give the Descendants a chance to review it and for them to see the burial sites first hand.

The consensus of the cultural descendants in attendance was that the BTP was sufficient for submittal to SHPD and for the OIBC to review. The descendants did not express specific concerns to moving the BTP review process forward. Suggestions regarding access, maintenance, and landscaping have been added to the proposed permanent protection measures.

CONSULTATION WITH KALAELOA HERITAGE PARK ADVISORY GROUP

On June 28, 2013, G70 conducted a consultation meeting between HCDA and the Kalaeloa Heritage Park Advisory Group. The meeting concluded with all parties agreeing that no further testing was necessary for the probable burial mounds. They were to be treated as burials.

CONSULTATION WITH ‘AHAHUI SIWILA HAWAI‘I O KAPOLEI

On March 21, 2017, G70 conducted a consultation meeting with ‘Ahahui Siwila Hawai‘i O Kapolei (ASHOK). The following questions and comments were raised by ASHOK:

- ASHOK has been formally in existence since 1993 – at that time, they were one of the few, if not the only recognizable Native Hawaiian Organization (NHO) within the Kalaeloa region. Became an active participant in the BRAC meetings. Final BRAC report stipulates that ASHOK needs to be a consulted NHO.
- ASHOK supports the direction and intent of the archaeological preservation plan, burial treatment plan, and dismissal of data recovery plan. Recommends that archaeological sites near the development footprint consider appropriate buffers but did not cite specific delineation distances. Inquired as to what SHPD typically requires. replied that it all depends on the type of site, location of site, and proximity to what adjacent activity and use. They would like to be update once the APP draft is prepared for further discussion.
- ASHOK would like to be kept in the loop regarding any update from conditions assessment and finds during any supplemental work.

OFFICE OF HAWAIIAN AFFAIRS (OHA)

On August 16, 2017, G70 organized a consultation meeting with OHA, SCS, and ASEF II, LLC., representative to discuss the BTP specifically and the project generally. Attendees at the meeting are as follows:

Kawika McKeague [G70], Ryan McCauley [Tritium 3, authorized owner’s representative for ASEF II LLC.], Nigel T. Kingsbury [SCS], Morgan Davis [SCS], Jerome Yasuhara [OHA], and Teresa Kaneakua [OHA].

The following is a general overview of the meeting:

Kawika begins the meeting giving the general information about the project and project area:

- soil maps,
- project area maps,
- flora and fauna identified within the project area during biological surveys.
- 2014 AIS recorded site locations map,
- presents arials showing 2012 geotech disturbances

- explains project's mitigation measures to be completed.
- reminds Jerome of his presence at the November 17, 2014 cultural descendant consultation meeting and that Kawika meant to include OHA in more direct consultation since that meeting. However, the project went on a temporary hold until 2017. Although OHA was provided a copy of the Draft EA that was recently published in June 2017, Kawika realized that OHA should have been included in direct consultation relative to the BTP and pending preservation plan. Kawika apologized for this oversight and appreciated OHA's willingness to engage the project team at this time.

Jerome and Teresa: asked some basic questions about the project.

Jerome: raises some public concerns that OHA has heard regarding the proposed project. Main concern addressed was that this project is being pushed without a Power Purchase Agreement (PPA) being in place. This raises concerns among the community that what is being proposed will not be what is constructed.

Ryan clarified that the project is part of HECO's Feed-in Tariff (FIT) program in which rates and standardized contract agreement terms are already in place. The FIT project was made available to independent power producers such as ASEF II who wish to sell power to HECO from a facility. There is a schedule by which program eligibility, rates, and terms of sale have been pre-determined. Accordingly, the agreed to terms of the project are for a single 5.0 megawatt (AC) solar farm power facility with a 12 kV distribution line. There are no plans for any future expansion beyond what has been negotiated with HECO.

Jerome asked about any recent damage to the sites identified in the 2014 AIS.

Morgan explained that an archaeological conditions assessment was completed in July 2017 of all 146 features previously identified. The assessment found that 145 of the previously identified features were in the same condition as previously identified in 2014. The only feature that appeared differently than its original identification was Site # -7487 Feature 2C, a portion of a wing, and that the feature was not damaged only that it had been turned over.

Kawika and Nigel: presented the findings of the supplemental AIS conducted in the Coral Sea Road ROW.

Kawika and Ryan informed OHA that the interim electrical distribution line will be turned over to HECO one year after its construction.

Ryan informed OHA that the lease for the project area is for 20 years.

Kawika extended an invitation to OHA to attend the next cultural descendant meeting but OHA declined as it had confidence in our process and level of engagement.

OHA did not raise any concerns regarding the BTP and was pleased with the level of consultation that this project has completed.

SUMMARY OF CONSULTATION RESULTS

As a result of the consultation process HCDA, ASEF, and G70 have incorporated many of the great suggestions offered by the cultural/ community organizations, and cultural descendants. Suggestions such as not conducting intrusive testing but relying upon cultural knowledge and expertise of the burial mounds, creating a firebreak, building a perimeter fence, utilizing the kiawe as a natural barrier, provisions of access, periodic maintenance, and preserving the burials in place have all been incorporated in to the burial treatment plan as forms of permanent mitigation.

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HO'OLAHA LEHULEHU
 PUBLIC NOTICE

nowemapa2014 29

HONOLULU AHUPUA'A
 NOTICE TO INTERESTED PARTIES IS HEREBY GIVEN that six human burials and seven isolated human bone fragments were identified by Cultural Surveys Hawai'i during the course of an archaeological inventory survey related to the Block I Project, Kaka'ako, Honolulu Ahupua'a, Kona District, O'ahu, TMK: [1] 2-3-002:001 (por.). The landowner is Victoria Ward Limited (VWL).

Background research indicates that during the *Māhele* the project area was within lands awarded to the American Board of Commissioners for Foreign Missions (Land Commission Award [LCA] 387), comprising the 'ili of Kukulūā'o. *Kuleana* (*maka'āinana*) LCAs within the vicinity include LCA 1903 to Lolohi and LCA 10463 to Napela.

Following the procedures of Hawai'i Revised Statutes (HRS) Chapter 6E-43, and Hawai'i Administrative Rules (HAR) Chapter 13-300, the remains were determined to be over 50 years old and most likely Native Hawaiian. The State Historic Preservation Division (SHPD) has assigned SIHP (State Inventory of Historic Properties) numbers of 50-80-14-7429 and 50-80-14-7655 to the human skeletal remains found. The project proponents are currently proposing preservation in place for all human skeletal remains. The decision to preserve in place or relocate these previously identified human remains shall be made by the O'ahu Island Burial Council (OIBC) in consultation with SHPD and any identified lineal and/or cultural descendants, per the requirements of HAR Chapter 13-300-33. The proper treatment of the remains shall occur in accordance with HAR Chapter 13-300-38.

SHPD is requesting persons having any knowledge of the identity or history of these human skeletal remains to immediately contact the SHPD Culture and History Branch, Mr. Hinano Rodrigues, at the DLNR Maui Office Annex, 130 Mahalani Street, Wailuku, Hawai'i 96793 [TEL (808) 243-4640, FAX (808) 243-5838]. All interested parties shall respond within thirty

(30) days of this notice and provide information to SHPD adequately demonstrating lineal descent from these specific burials or cultural descent from ancestors buried in the same *ahupua'a* or district.

**BURIAL NOTICE
- KALAELOA**

NOTICE TO INTERESTED PARTIES IS HEREBY GIVEN that two possible unmarked human burial sites, categorized as "previously identified," were identified by Scientific Consultant Services, Inc. during an Archaeological Inventory Survey for a proposed solar farm located in Kalaeloa, Honouliuli Ahupua'a, 'Ewa District, Island of O'ahu, Hawai'i [TMK: (1) 9-1-013:070].

The two rock mounds possibly containing human burials are presumed to date to the pre- and/or early post-Contact Period and both sites are presumed to contain traditional Native Hawaiian remains. The sites have been designated as State Inventory of Historic Properties (SIHP) State Site 50-80-12-7483 (Feature 4) and SIHP State Site 50-80-12-7486 (Feature 2). No Land Commission Awards were awarded within the project area.

Proposed treatment is preservation in place. Proper treatment shall occur in accordance with Chapter 6E, Revised Statutes, Section 43 regarding prehistoric and historic burial sites and Hawai'i Administrative Rules (HAR) Chapter 13-300. The O'ahu Island Burial Council (OIBC) has jurisdiction in this matter and the final determination on whether the burials will be preserved in place or relocated shall be made by the OIBC in consultation with any recognized lineal and/or cultural descendants. Appropriate treatment shall occur in accordance with HAR Chapter 13-300-38.

All persons that may have any knowledge or information possibly affiliated with the human remains are asked to immediately contact: Mr. Hinano Rodrigues, State Historic Preservation Division (SHPD), DLNR Maui Office Annex, 130 Mahalani Street, Wailuku, Maui 96743 [Tel: (808) 243-4640].

All interested persons that would like to file descendant claim forms

and/or provide information to the SHPD shall respond within 30 days of this notice and be able to adequately demonstrate lineal descent from these Native Hawaiian burials or cultural descent from ancestors buried in the same *ahupua'a* or district where the Native Hawaiian skeletal remains are buried. The applicant for this project is Hawaii Community Development Authority and the contact person is Mr. Kawika McKeague, Group 70 International, Inc., 925 Bethel Street, Fifth Floor, Hon. HI 96813-4307, [Tel. (808) 523-5866].

WAIKIKI AHUPUA'A

NOTICE TO INTERESTED PARTIES IS HEREBY GIVEN that disarticulated human bone fragments, assigned State Inventory of Historic Properties (SIHP) # 50-80-14-4570 and SIHP # 50-80-14-7676, were identified by Cultural Surveys Hawai'i, Inc. during the course of an archaeological inventory survey related to the Hilton Hawaiian Village Grand Islander Project, Waikiki Ahupua'a, 'ili of Kālia, Honolulu (Kona) District, O'ahu TMK: [1] 2-6-005:001 and 2-6-008:039 (portion).

Following the procedures of Hawai'i Revised Statutes (HRS) Chapter 6E-43, and Hawai'i Administrative Rules (HAR) Chapter 13-300, the remains are believed to be over 50 years old. In its evaluation of ethnicity the State Historic Preservation Division (SHPD) has determined that the remains are most likely Native Hawaiian. Found during an archaeological inventory survey, these remains are previously identified [per HAR 13-300-31(b)].

Background research indicates that during the *Māhele*, land within the project area was awarded to Alapai (Land Commission Award [LCA] 2511). A nearby land claim was awarded to Paoa (LCA 1775).

Hilton Hawaiian Village's representative for this project is Group 70 International, and the contact person is: Mark Kawika McKeague, Senior Planner and Director of Cultural Planning, 925 Bethel Street, 5th Floor, Honolulu, Hawai'i 96813 [TEL (808) 523-5866 extension 120].

Proposed treatment is relocation within the project area. The O'ahu Island Burial Council (OIBC) has jurisdiction in this matter and the proper disposition and treatment of these remains will be determined by the OIBC, in consultation with any recognized lineal and/or cultural descendants, per the requirements of HAR Chapter 13-300-33. Appropriate treatment shall occur in accordance with HAR Chapter 13-300-38.

All persons having any knowledge of the identity or history of this human bone are requested to immediately contact the SHPD Culture and History Branch, Mr. Hinano Rodrigues, at the DLNR Maui Office Annex, 130 Mahalani Street, Wailuku, Hawai'i 96793 [TEL (808) 243-4640, FAX (808) 243-5838].

All interested parties shall respond within thirty (30) days of this notice and file descendant claim forms and/or provide information to the SHPD adequately demonstrating lineal descent from these remains or cultural descent from ancestors buried in the same *ahupua'a* or district.

WAIKIKI AHUPUA'A

NOTICE TO INTERESTED PARTIES IS HEREBY GIVEN: that a mound with the potential of having burial components, as well as three caves which enshrine human skeletal remains, have been designated as State Inventory of Historic Properties (SIHP) # 50-30-06-2231, SIHP # 50-30-06-2232 and SIHP # 50-30-06-2233 and were identified by Cultural Surveys Hawai'i, Inc. (CSH) during the course of an archaeological inventory survey related to the Menehune Road Rockfall Mitigation Project located in the 'ili of Pe'ekaua'i, at Waimea Ahupua'a, Waimea (Kona) District, on Kaua'i island, TMKs: [4] 1-6-003:056; 1-6-005:017; 1-6-010:001-003.

Following the procedures of Hawai'i Revised Statutes (HRS) § 6E-43, and Hawai'i Administrative Rules (HAR) § 13-300 remnants in the caves are believed to hold skeletal remains dating over 50 years old. An evaluation of ethnicity has been made by the State Historic

Preservation Division (SHPD) and both burials are believed most likely to be Native Hawaiian.

Background research indicates that during the *Māhele* Act of 1848 the area featuring the rock mound and the three burial caves was not awarded land and was considered Crown Lands. Over 50 claims were awarded in the 'ili of Pe'ekaua'i. The two closest were LCA 3310 awarded to Manu, and LCA 3593 awarded to Keikiote. These two *kuleana* claims are located between Menehune Road and Kana'ana Ridge.

The applicant for this project is AECOM, and the contact person is: Randy Hamamoto, Project Manager AECOM, 1001 Bishop Street, Suite 1600, Honolulu, HI 96813 [TEL (808) 521-3051, FAX (808) 524-0246].

Proposed treatment is preserve in place. The Kaua'i-Ni'ihau Island Burial Council (KNIBC) has jurisdiction in this matter and the proper disposition and treatment of these burials will be determined by the KNIBC, in consultation with any recognized lineal and/or cultural descendants, per the requirements of HAR § 13-300-33. Appropriate treatment shall occur in accordance with HAR § 13-300-38.

All persons having any knowledge of the identity or history of these human burials are requested to immediately contact Mrs. Kauano Ho'omanawanui, burial site specialist for Kaua'i Island, at DLNR Kauai Office, P.O. Box 1729, Lihue, Hawaii 96766 [TEL (808) 692-8015, (cell) (808) 896-0475, FAX (808) 692-8020] or Mr. Hinano Rodrigues at the DLNR Maui Office Annex, 130 Mahalani Street, Wailuku, Hawaii 96793 [TEL (808) 243-4640, FAX (808) 243-5838].

All interested parties shall respond within thirty (30) days of this notice and file descendant claim forms and/or provide information to the SHPD adequately demonstrating lineal descent from this designated burial or cultural descent from ancestors buried in the same *ahupua'a* or district.

Mahalo nui loa na kuu manawa i ho'oponopono. Malama pono. (Thank you for your time to set things right. Take care, be right). ■

Figure 10. November 2014 Issue of Ka Wai Ola (Vol. 31, No.11) with SCS's announcement of possible burial mounds.

AFFIDAVIT OF PUBLICATION

IN THE MATTER OF
Burial Notice - Kalaheo

STATE OF HAWAII }
City and County of Honolulu } SS.

Doc. Date: 10/6/14 **# Pages:** 1

Notary Name: COLLEEN E. SORANAKA **First Judicial Circuit**

Doc. Description: Affidavit of Publication

Colleen E. Soranaka 10/6/14
Notary Signature Date

COLLEEN E. SORANAKA
NOTARY PUBLIC
No. 90-263
STATE OF HAWAII

Julie Clark being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser and MidWeek, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the aforementioned newspapers as follows:

Honolulu Star-Advertiser 3 times on:
10/01, 10/03, 10/05/2014

Midweek Wed. 0 times on:
_____ times on:

And that affiant is not a party to or in any way interested in the above entitled matter.

Julie Clark
Julie Clark

Subscribed to and sworn before me this 6th day
of October A.D. 20 14

Colleen E. Soranaka
Colleen E. Soranaka, Notary Public of the First Judicial Circuit
State of Hawaii

My commission expires: Jan 06 2016

Ad # 0000674557

COLLEEN E. SORANAKA
NOTARY PUBLIC
No. 90-263
STATE OF HAWAII

Burial Notice - Kalaheo

NOTICE TO INTERESTED PARTIES IS HEREBY GIVEN that two possible unmarked human burial sites, categorized as "previously identified", were identified by Scientific Consultant Services, Inc. during an Archaeological Inventory Survey for a proposed solar farm located in Kalaheo, Honolulu Ahupua'a, Ewa District, Island of Oahu, Hawaii (TMK: (1) 9-1-013-070).

The two rock mounds possibly containing human burials are presumed to date to the pre-contact / or early post-Contact Period and both sites are presumed to contain traditional Native Hawaiian remains. The sites have been designated as State Inventory of Historic Properties (SIHP) State Site 50-80-12-7483 (Feature 4) and SIHP State Site 50-80-12-7486 (Feature 2). No Land Commission Awards were awarded within the project area.

Proposed treatment is preservation in place. Proper treatment shall occur in accordance with Chapter 66, Revised Statutes, Section 43 regarding prehistoric and historic burial sites and Hawaii's Administrative Rules (HAR) Chapter 13-300. The Oahu Island Burial Council (OIBC) has jurisdiction in this matter and the final determination on whether the burials will be preserved in place or relocated shall be made by the OIBC in consultation with any recognized lineal and/or cultural descendants. Appropriate treatment shall occur in accordance with HAR Chapter 13-300-38.

All persons that may have any knowledge or information possibly affiliated with the human remains are asked to immediately contact: Mr. Hinano Rodriguez, State Historic Preservation Division (SHPD), DLNR, Maui Office Annex, 130 Mahalani Street, Wailuku, Maui 96743 [Tel: (808) 243-4640].

All interested persons that would like to file descendant claim forms and/or provide information to the SHPD shall respond within 30 days of this notice and be able to adequately demonstrate lineal descent from these Native Hawaiian burials or cultural descent from ancestors buried in the same ahupua'a or district where the Native Hawaiian skeletal remains are buried. The applicant for this project is Hawaii Community Development Authority and the contact person is Mr. Kaula McKee, Group 70 International, Inc., 925 Bethel Street, Fifth Floor, Honolulu, HI 96813-4307 [Tel: (808) 523-5866].
(SAGT4557 10/1, 10/3, 10/5/14)

SP.NO.: _____ L.N. _____

Figure 11. Image of newspaper (Star-Advertiser and Midweek) clipping from 10/01/2014 through 10/05/2014, with signed notary attesting to the legitimacy of the advertisement.

BURIAL TREATMENT AND PRESERVATION

Pursuant to Hawaii Administrative Rules (HAR) §13-300-36 (a) (3 and 5), preservation for Feature 4 Burial Mound of Site 50-80-12-7483, and Feature 2 Burial Mound of Site 50-80-12-7486, will take the form of avoidance and protection, also referred to as *conservation*. There are no plans at this time to further interpret these sites. It is proposed herein that these existing sites and features will be left in place and afforded a singular, transparent buffer zone that encircles both Site -7483 and Site -7486. Given these sites proximity to the other 21 sites and 134 associated features located in the project area which are proposed for preservation in the Archaeological Preservation Plan (in preparation), a buffer zone will enclose the entire population of preservation sites (burial and otherwise), to create an archaeological preserve. The historic properties will be preserved as is. However, the preserve area will consist of a single large preserve in the northern portion of the parcel (including the burial mound locations) and three smaller landlocked preserve areas. This “archaeological preserve” will afford full protection of the historic properties. The following sections outline the necessary preservation measures that will apply to Site -7483 Feature 4 and Site -7486 Feature 2.

PROPOSED MITIGATION: INTERIM

Due to the construction of the solar panel field in the area makai (seaward) of the proposed archaeological preserve, the following interim protection measures shall be instituted prior to, or during, nearby construction:

1. Site boundaries for the archaeological preserve will be verified and orange construction fencing will be erected 3m (ten feet) beyond the permanent site perimeter as a temporary buffer zone.
2. No heavy equipment or other construction-related machines or materials will be allowed to be moved or stored within the archaeological preserve area.
3. Archaeological monitoring shall be conducted during construction and the monitor shall conduct a pre-construction briefing with all project crews and identify the boundaries of the archaeological preserve and interim buffer zones and discuss sensitive nature of the site.
4. Preservation areas shall be clearly illustrated on all project construction drawings and plans.

PROPOSED MITIGATION: PERMANENT

The sites will be surveyed and placed within the land deed and data will be registered with the State of Hawaii Bureau of Conveyances per HAR §13-300-38 (g) creating a permanent preservation easement.

To ensure long-term protection and preservation of the burials, State Site 50-80-12-7483 Feature 4 and State Site 50-80-12-7486 Feature 2, within the bounds of the archaeological preserve, will have the following long-term preservation measures instituted:

1. The project developer shall construct a six-foot-tall cyclone fence around the entirety of TMK: (1) 9-1-013:070 to create a secured facility. The fence shall be installed at least 3m (10 feet) from the edge of the preservation preserve area perimeter.
2. As State Site -7483 Feature 4 and -7486 Feature 2 are within the archaeological preserve, no separate long-term buffer is proposed for the burial site areas.
3. The existing kiawe thicket will be maintained and utilized as a natural barrier to deter potential vandals.
4. A firebreak (a vegetation-free zone) will be maintained inside of the TMK perimeter fence. This firebreak shall be constructed to a width of 3m (10 feet).
5. No ground-altering activity will be allowed in the immediate vicinity of the two burial features. Other than those ground-altering activities required for the creation or maintenance of the preserve that shall be approved through consultation with the OIBC, the SHPD, and cultural descendants.
6. The burial sites and the large archeological preserve shall remain free of structures and signage.
7. No heavy equipment or other construction-related machines or materials will be allowed to be moved or stored in the archaeological preserve area.
8. An annual inspection of the burial mounds shall consist of a visual inspection of the vegetation, condition of the features, and rubbish. All vegetation associated with the burial area shall only be removed by hand-held machinery (chainsaw, weed eater, etc.) and by hand-clearing techniques. Trees or large shrubs that pose a risk to the burial mounds shall be trimmed to remove excess weight and braced to ensure both the tree's wellbeing and the integrity of the site. Rubbish is to be picked up by hand and removed from the area.
9. The burial features shall be made accessible for recognized cultural descendants without a cleared foot path to be established within the boundaries of the property. Access to the property and burial features by the recognized cultural descendants will

- be coordinated with ASEF II and HCDA as the landowner. Due to the sensitive nature of the archaeological preserve and the adjacent operations of the solar farm facility, access to the burial features will require on-site escort. However, provisions will be made to avail opportunity for privacy.
10. All landscaping (if so desired by the recognized cultural descendants) shall include native Hawaiian plant species that are capable of thriving in the arid environment.
 11. Should the burial mounds be disturbed by a natural disaster ASEF II LLC., and HCDA shall immediately notify SHPD of the damage. Prior to taking any actions that directly involve the burial mounds (i.e., any action which may result in the stacked rocks being moved at all, even if they are displaced) ASEF II, and HCDA shall begin consultation with the SHPD, and the recognized cultural descendants on an agreeable course of action to best care for these features.

Permanent protection measures include:

1. The permanent buffer area will extend 3m outward from the perimeter of the “archaeological preserve” which encompasses all sites and associated features (including the two Burial areas) found within the project area.
2. The interim and long-term preservation will insure that the integrity and context of the archaeological preserve is maintained. Each burial site feature and its assigned buffer zone internal to the archaeological preserve will be surveyed and filed with the State of Hawai‘i Bureau of Conveyances. The permanent buffer zone will remain around this site regardless of whether any sort future development occurs elsewhere on the parcel.
3. Should storm, earthquake, or other natural or cultural damage occur to the site and/or buffer zone and its environs, and should this necessitate any repairs to ensure the safety of the site, the landowner will notify SHPD and discuss how to proceed prior to implementing any alteration activities.
4. If the landowner finds that the burial area has been disturbed in any way, they will immediately notify SHPD. Protection, repairs, or stabilization of the damages cannot proceed without consultation with the SHPD.
5. This burial plan will be made part of the binding agreement between the landowner of record and the SHPD.

6. A provision is made for on-going preservation of the burial area. The area will be preserved in perpetuity, with the preservation provisions outlined above being binding on successive owners of the parcel unless otherwise agreed to with the SHPD.

Recognized descendants may be granted access for planned visits to the site as necessary. Cultural access will be coordinated with the landowner pursuant to the procedures outlined below:

1. Cultural descendants must notify the landowner two weeks prior to the desired date of access.
2. Cultural descendants must be recognized as descendants by the OIBC.

SPATIAL RELATIONSHIP OF DEVELOPMENT

Figure 14 (see below) illustrates the spatial relationship between Site 50-80-12-7486 Feature 2 and Site 50-80-12-7483 Feature 4 to the planned development. Site -7486 Feature 2 is approximately 100m northeast of the planned development. Site -7483 Feature 4 is located approximately 75m northeast of the closest portion of the development.

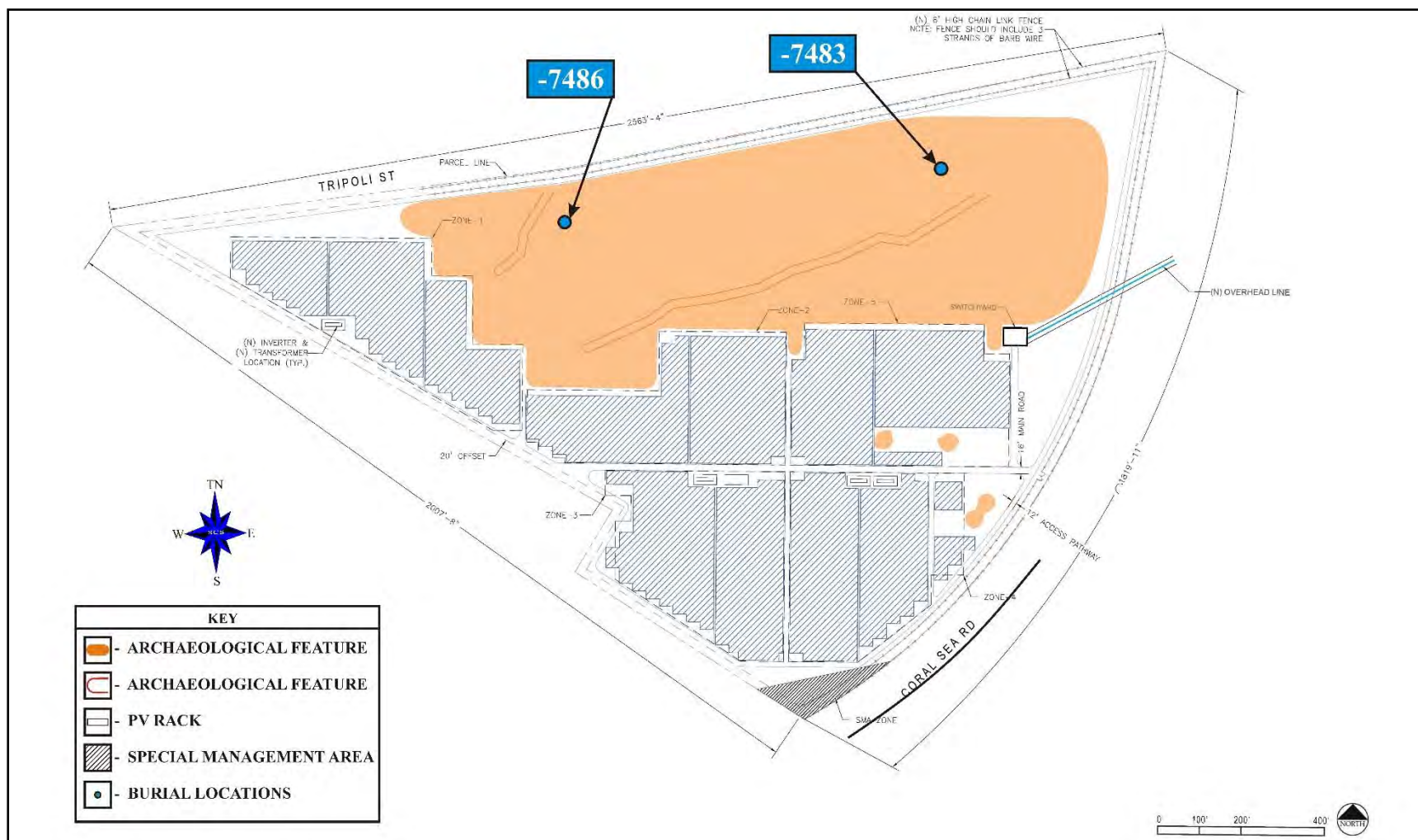


Figure. Concept map showing the approximate locations of Site 50-80-12-7486 Feature 2 and Site 50-80-12-7483 Feature 4. Note, figure is a 30% detail drawing based on SCS collected feature points. Update forthcoming.

CURRENT CONDITION ASSESSMENT

These features were revisited by SCS archaeologists in June of 2017 as part of a condition assessments for all sites recorded in the AIS as an interim preservation mitigation measure requested by SHPD.

Site #-7483 Feature 4 was observed during the 2017 conditions assessment and no changes were observed to the feature when compared with the 2013 documentation of the feature. Therefore, the burial feature is still assessed as “good” condition.

Site #-7486 Feature 2 was also observed during the 2017 conditions assessment and no changes were observed to the feature when compared with the 2013 documentation of the feature. Therefore, the burial feature is still assessed as “fair” condition.

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APPENDIX A: SHPD ACCEPTANCE LETTERS

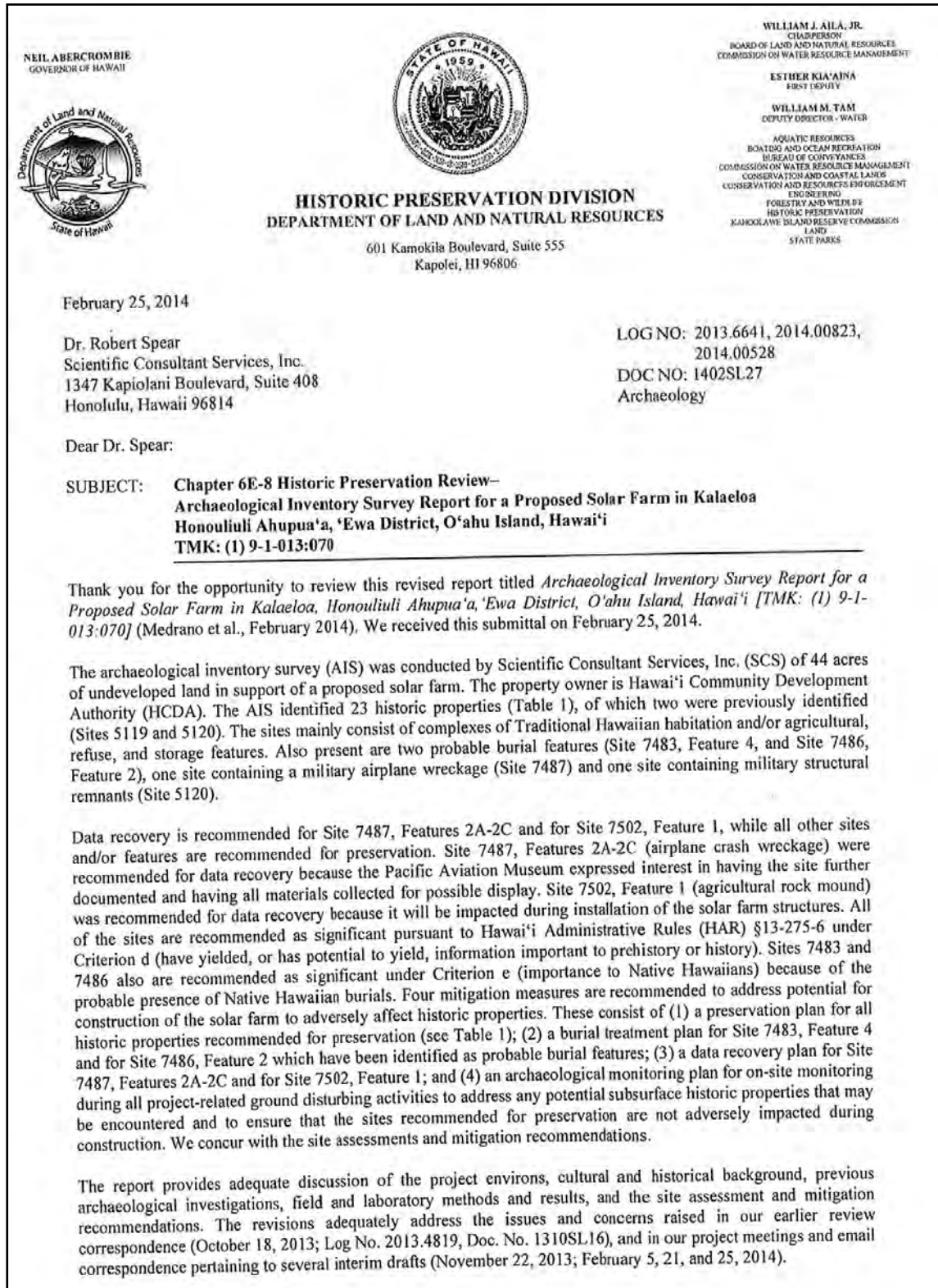


Figure 12. SHPD acceptance letter for the completed AIS, Page 1.

Dr. Spear
February 25, 2014
Page 2

The archaeological inventory survey report meets the requirements specified 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.

Please contact me at (808) 692-8019 or at Susan.A.Lebo@hawaii.gov if you have any questions regarding this letter.

Aloha,

Susan A. Lebo

Susan A. Lebo, PhD
Oahu Lead Archaeologist

Table 1. Archaeological Historic Properties Identified During AIS.

SIHP	Total Features	Feature Types	Function	Significance Recommendation	Mitigation Recommendation
7483	10	Karst pits, mounds (possible burial), mounds (agriculture)	Ag/refuse, w/possible burial component	d, e (Feature 4)	Preservation
7484	3	Karst pits, midden scatter	Ag/refuse, habitation complex	d	Preservation
7485	2	Karst pit, mound	Ag/refuse	d	Preservation
7486	5	Karst pits, linear path, and rock mound	Ag/refuse, ranching, transportation, w/possible burial component	d, e (Feature 2)	Preservation
7487	12	Karst pits, airplane crash remnants, concrete pads, L-shaped structure, and platform/wall	Ag/refuse, storage, military, and boundary	d	Preservation, Data Recovery (Features 2A-2C)
7488	1	Karst pit	Ag/refuse	d	Preservation
7489	2	Karst pits	Ag/refuse	d	Preservation
7490	3	Karst pits, walled karst pit	Ag/refuse	d	Preservation
7491	1	Path	Transportation	d	Preservation
7492	45	Rock mounds, enclosures, and C-, reverse J-, L-, T-, and U-shaped structures	Ag/habitation complex	d	Preservation
7493	1	Karst pit	Storage/refuse	d	Preservation
7494	1	Walled karst pit	Ag/storage	d	Preservation
7496	2	Platform, platform/mound	Ag/habitation and storage complex	d	Preservation
7497	1	Rock mound	Ag	d	Preservation
7498	3	Karst pits	Ag/refuse, storage complex	d	Preservation
7499	3	Karst pits, walled karst pit	Ag/storage and refuse complex	d	Preservation
5119	37	Karst pits, and C-, L-, and U-shaped structures	Ag/refuse, storage, habitation complex	d	Preservation
5120	9	Karst pit, wall, concrete pad, guard shack, and concrete enclosure, foundations, and pillbox	Ag/refuse, military, boundary	d	Preservation
7500	1	Karst pit	Ag/refuse	d	Preservation
7501	1	Mound	Dozer push pile	d	Preservation
7502	1	Mound	Ag	d	Data Recovery (Feature 1)
7503	1	C-shaped structure	Habitation	d	Preservation
7504	2	Karst pit, mound	Ag/refuse	d	Preservation

Figure 13. SHPD acceptance letter of the completed AIS, Page 2.



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

December 18, 2017

SUZANNE B. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSIONER OF WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA,
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCES MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAMOOHAWA ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Mr. Jesse Souki
Executive Director, Hawaii Community Development Authority
547 Queen Street
Honolulu, HI 96813
dbedt.hcda.contact@hawaii.gov

Log NO: 2017.02484
DOC NO: 1712RKH05

Aloha mai kua,

SUBJECT: DRAFT Burial Treatment Plan for Two Burial Locations, SIHP #50-80-12-7483 Feature 4 and SIHP 50-80-12-7486 Feature 2, within a proposed Archaeological Preserve for the Aloha Solar Energy Fund II Project (ASEF II) on a Hawaii Community Development Authority parcel, in Kalaeloa, Honouliuli Ahupuaa, Ewa District, Oahu Island, TMK: [1] 9-1-013:070

At its meeting on October 25, 2017, the O'ahu Island Burial Council (OIBC) made the determination that the above SIHP features shall be preserved-in-place. Additionally, the OIBC recommended that the State Historic Preservation Division (SHPD) accept the DRAFT Burial Treatment Plan.

Following the recommendation of the OIBC, the DRAFT Burial Treatment Plan for Two Burial Locations, SIHP #50-80-12-7483 Feature 4 and SIHP 50-80-12-7486 Feature 2, within a proposed Archaeological Preserve for the Aloha Solar Energy Fund II Project (ASEF II) on a Hawaii Community Development Authority parcel, in Kalaeloa, Honouliuli Ahupuaa, Ewa District, Oahu Island, TMK: [1] 9-1-013:070, is accepted by the SHPD. Please change the title from DRAFT to FINAL, submit the FINAL plan to the SHPD's Kapolei office, and include a text-searchable PDF electronically or a CD copy with your submission.

Contact the Oahu Burial Sites Specialist, Ms. Regina K. Hilo, if you have any questions and/or concerns via email at: Regina.Hilo@hawaii.gov.

Na'u no,

Hinano Rodrigues

Hinano Rodrigues, J.D.
History and Culture Branch Chief
State Historic Preservation Division

CC: Mr. Kawika McKeague, G70
Ms. Morgan Davis, SCS

Figure 14: SHPD acceptance letter of the BTP for two burials.