

DEPARTMENT OF PLANNING

KA'ĀINA HULL, DIRECTOR

JODI A. HIGUCHI SAYEGUSA, DEPUTY DIRECTOR



DEREK S.K. KAWAKAMI, MAYOR
REIKO MATSUYAMA, MANAGING DIRECTOR

March 9, 2026



Agency comments received by the Planning Department as of March 9, 2026, 9:00 am for the March 10, 2026, Planning Commission meeting regarding the following item:

- G.2.a. CLASS IV ZONING PERMIT (Z-IV-2026-12), USE PERMIT (U-2026-9) and SPECIAL PERMIT (SP-2026-4) to construct and operate a solar utility facility on lands located on the mauka side of Kaunualii Highway in Makaweli, directly across of the Makaweli Post Office facility, further identified as Tax Map Keys: (4) 1-7-006:006 (Por.) and 010 (Por.), and containing a project area of approximately 269 acres = KAAWANUI SOLAR LLC. [Director's Report Received, 2/24/2026].**

JOSH GREEN, M.D.
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF LAND AND NATURAL RESOURCES
KA 'OIHANA KUMUWAIWAI 'ĀINA

STATE HISTORIC PRESERVATION DIVISION
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BOATING AND OCEAN RECREATION
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CONSERVATION AND RESOURCES
ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

March 6, 2026

Ka'āina S. Hull, Director
County of Kaua'i
Planning Department
4444 Rice Street, Suite A473
Līhu'e, Hawai'i 96766
Email: mapuana.r.osullivan@hawaii.gov

IN REPLY REFER TO:
Project No.: 2025PR00506
Doc No.: 2603DB01
Archaeology, Architecture

Dear Ka'āina S. Hull:

SUBJECT: Hawaii Revised Statutes (HRS) §6E-42 Historic Preservation Review – Kaawanui Solar Project – Kaawanui Solar LLC. – Makaweli, Waimea, HI County of Kauai Zoning Class IV Permit (Z-IV-2026-12), Use Permit (U-2026-9), and Special Permit (SP-2026-4) Archaeological Inventory Survey Report Reconnaissance Level Survey Report Makaweli Ahupua'a, Waimea District, Island of Kaua'i TMK: (4) 1-7-006:006 por. and 010 por.

This letter provides the State Historic Preservation Division's (SHPD's) HRS §6E-42 review of the proposed construction of the Kaawanui Solar Project including County permits, an Archaeological Inventory Survey (AIS) report titled, *Archaeological Inventory Survey Report for the Kaawanui Solar Project, Makaweli Ahupua'a, Waimea District, Kaua'i, TMKs: (4) 1-7-006:006 por. and 010 por.* (Bautista, et al., March 2026), and a Reconnaissance Level Survey titled, *DRAFT Reconnaissance Level Survey, Kaawanui Solar Project, Makaweli Ahupua'a, Waimea District, Kaua'i, TMK: [4] 1-7-006: 006 por. and 010 por.* (MASON, September 2025). The permit applications associated with the project include Zoning Class IV (Z-IV-2026-12), Use Permit (U-2026-9), and Special Permit (SP-2026-4). SHPD received the revised AIS report via email (CSH's sharepoint link) on March 6, 2026.

Kaawanui Solar, LLC, in cooperation with the Kaua'i Island Utility Cooperative (KIUC), is pursuing a new renewable energy solar-plus-battery-storage project, which would be developed under a power purchase agreement (PPA) currently under review by the Hawai'i Public Utilities Commission. The scope of work includes, but is not limited to, secured space for firefighting vehicles and equipment, supplies and materials, heavy maintenance equipment, office space, and a maintenance area.

The project area is owned by Robinson Family Partners and managed by Gay & Robinson, Inc. Kaawanui Solar LLC (affiliate of AES) is the lessee and applicant. The project is situated within an approximate 286-acre (115.74-hectare) project study area. The final project area will be smaller.

The SHPD received the initial project submission documents on April 25, 2025, which included a cover letter dated April 24, 2025 from AES and Ka'awanui Solar, LLC requesting early consultation, an HRS 6E Submittal Form, a literature review and field inspection (LRFI) report titled, *Draft Archaeological Literature Review and Field Inspection for the Ka'awanui Solar + Storage Project, Makaweli Ahupua'a, Waimea*

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District, Kaua'i, TMKs: (4) 1-7-006:006 por. and 010 por. [Bautista et al. 2025], additional documentation titled *Results of Archaeological Oversight for a Geotechnical Survey for the Ka'awanui Solar + Storage Project, Makaweli Ahupua'a, Waimea District, Kaua'i, TMK(s): portions (4) 1-7-006:006 por. and 010 por.* [Hammatt 2025], and a geographical information system aerial map of the project study area. The LRFI and the geotechnical survey documents were prepared by Cultural Surveys Hawai'i, Inc. (CSH).

SHPD previously reviewed the project and requested that the LRFI (Bautista et al. 2025), which identified fourteen architectural resources consisting of historic-era features with plantation sugarcane agriculture (including portions of plantation roads and the Old Government Road, rock walls, ditch systems, a railroad remnant, and a water tank) within the project area, be converted into an archaeological inventory survey (AIS) meeting the requirements of HAR §13-276-5 (October 9, 2025; Doc. No. 2510LS03). For previous SHPD correspondence and project information, please refer to SHPD's previous letter.

The AIS report (Bautista et al. 2025) further documents one previously identified historic property (State Inventory of Historic Places [SIHP] Site #50-30-09-02269) and five newly identified architectural resources (Temporary Site #'s CSH-3 through CSH-7). The AIS indicates that SIHP Site # 50-30-09-02269 (historic plantation ditch system) includes a portion located upslope of the current project area, which was previously documented and assessed by Byerly and O'Day (2015:22) as significant under HAR §13-284-6 Criterion d. CSH-3 is a historic Old Government Road segment and CSH-4 is a segment of the historic Ka'awanui Village Road that dates from the late nineteenth to early twentieth century that was built to access Camp Six (Ka'awanui Village) and other upland areas of Makaweli Plantation. CSH-4 consists of two features, the actual travel way of the road (Feature 1), and a dry stacked rock wall (Feature 2) running parallel to the road along the western side. CSH-5 is described as a historic (early to mid-twentieth century plantation roadway called "Hanger Road". This roadway bisects the western portion of the project area and continues northeast beyond the project area. CSH-6 is an isolated railroad track remnant located within the central portion of the project area within a section of Old Government Road (Temporary site # CSH-3). The location and alignment is consistent with railroad shown on a historic 1927 map, however MASON indicates that the remnant rails do not match the rails used by the Hawaiian Sugar Company and, thus CSH-6 is a modern feature rather than historic. Lastly, CSH-7 is described as a historic water tank facility from the mid-twentieth century, located along the lower portion of Ka'awanui Village Road (CSH-4) in the southern portion of the project area.

Mason Architects, Inc. (MASON) was hired by CSH to complete a Reconnaissance Level Survey (RLS) for the project. Per MASON (2025), the LRFI completed by CSH identified fourteen architectural resources (see Attachment) that were evaluated in the RLS. Of the fourteen resources, seven were built ca. 1977 or later and are not considered historic properties per HRS §6E-2. The remaining seven resources are older than 50 years old and were assessed for significance per HAR §13-284-6. MASON determined that none of the fourteen resources (including CSH-3 through CSH-7) were evaluated as meeting HAR §13-284-6 significance and integrity criteria or are eligible for listing on the Hawaii Register of Historic Places (HRHP). **SHPD concurs with MASON's determinations.**

The RLS report meets the minimum requirements of HAR §13-284-5(b)(5)(c). **It is accepted.** Please send a hard copy of the document, clearly marked FINAL, along with a copy of this letter and a text-searchable PDF version of the RLS report to the Kapolei SHPD office, attention SHPD Library. Also, submit a text-searchable PDF copy of the final RLS report to HICRIS Project No. 2024PR00506 in response to our request in HICRIS.

At this time, **the AIS report (Bautista et al. 2026) needs to be revised before meeting the requirements of HAR §13-276-5.** SHPD requests CSH consult with our office regarding the integrity, site significance, and evaluations of eligibility for the HRHP, to ensure the AIS and RLS assessments are consistent. Both documents concur that none of the sites are eligible for the HRHP but differ in other aspects of the assessments.

Based on the information provided in the RLS (MASON 2025) and draft AIS (Bautista et al. 2026), SHPD's determination is "No historic properties affected" for the current project pursuant to HAR §13-284-7(a)(1) for the current project scope.

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SHPD hereby notifies the County of Kaua'i that the project approval and permitting processes may continue with the stipulation that the final revisions to the AIS report will be completed and approved by SHPD within three months of issuance of this letter.

Contact Mary Kodama, Architecture Branch Chief, at Mary.Kodama@hawaii.gov, for any matters regarding architectural resources, or David Buckley, Kaua'i Lead Archaeologist, at David.Buckley@hawaii.gov, or Susan A. Lebo, Archaeology Branch Chief, at Susan.A.Lebo@hawaii.gov, for any concerns regarding archaeological resources or this letter.

Aloha,

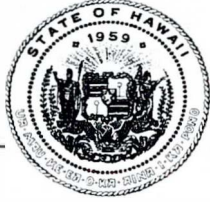


Jessica L. Puff, PhD
Administrator, State Historic Preservation Division
Deputy State Historic Preservation Officer

cc: Tracy Camuso, tracyc@g70.design
Megan Kane, Megan.Kane@aes.com
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David Shideler, CSH Inc., dshideler@culturalsurveys.com
Cam Black, Cameron.b.black@hawaii.gov

Attachment
Summary of MASON evaluation of Architectural Resources

Resource	Year Built	Meets HAR §13-284-6 and Hawaii Register Criteria
Culvert -02269-CSH-2A on West Lateral Ditch	Ca. 1910	No
Culvert -02269-CSH-2C on West Lateral Ditch	Ca. 2000	No - resource less than 50 years old
Ditch diversion (Board-adjusted gate) -02269-CSH-1A on East Lateral Ditch	ca. 1977	No - resource less than 50 years old
Culvert -02269-CSH-1B	Ca. 1977	No - resource less than 50 years old
Culvert -02269-CSH-1C	Ca. 1977	No - resource less than 50 years old
Check and Turnout -02269-CSH-1D	Ca. 1946	No
Settling Box -02269-CSH-1E	Ca. 1946	No
Culvert -02269-CSH-2D on West Lateral Ditch	Ca. 2000	No - resource less than 50 years old
Culvert -02269-CSH-2E on West Lateral Ditch	Ca. 2000	No - resource less than 50 years old
Railroad Track Remnant CSH-6	Ca. 1995	No - resource less than 50 years old
Water Tank CSH-7	Ca. 1950	No
Ka'awanui Village Road CSH-4 Feature A	Ca. 1901	No
Old Government Road CSH-3 Feature A	Ca. 1910	No
"Hanger Road" CSH-5	Ca. 1927	No



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March 10, 2026

County of Kaua'i
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Via email: planningdepartment@kauai.gov

**Subject: CLASS IV ZONING PERMIT (Z-IV-2026-12), USE PERMIT (U-2026-9)
and SPECIAL PERMIT (SP-2026-4); Kaawanui Solar Project**

Dear County of Kaua'i Planning Commission,

The Hawai'i State Energy Office (HSEO) is pleased to offer comments in support of the proposed Kaawanui Solar Project (Project), a 42 megawatt (MW) solar photovoltaic project paired with a 172 megawatt-hour (MWh) lithium-ion battery energy storage system located in the Makaweli ahupua'a, Kona Moku on the southwest side of Kaua'i island.

HSEO's comments are guided by its statutory purpose under Chapter 196-71, Hawai'i Revised Statutes, to promote energy efficiency, renewable energy, and clean transportation to help achieve a resilient, clean economy for Hawai'i. HSEO believes the Project offers economic, environmental, and electric grid benefits to the people and businesses of Kaua'i, warranting its support.

The Project owner, AES Hawai'i, would sell electricity from the Project to the Kaua'i Island Utility Cooperative (KIUC) under a 25-year power purchase agreement (PPA). Importantly, the Project is an opportunity to further reduce and stabilize electricity costs on Kaua'i, with pricing at \$0.15239/kilowatt hour (kWh).¹ The PPA was approved by the Hawai'i Public Utilities Commission (PUC) on March 2, 2026.² KIUC estimates the Project would result in savings for an average residential customer of \$4.26 the first year of operation and \$21.08 the last (25th) year of the PPA term.³ The dynamic link between energy costs and renewable energy development is clearly demonstrated on Kaua'i, which formerly had the highest energy costs in the State. Through the timely adoption of renewable energy, KIUC has successfully lowered and stabilized

¹ Kaawanui Solar Power Purchase Agreement, Docket number [2025-0198](#)

² The PPA price may be adjusted higher or lower in specific situations related to federal tax credits and/or adjustments due to tariffs. Hawai'i PUC [Decision & Order 42373](#), p. 9.

³ Hawai'i PUC [Decision and Order 42373](#), p. 15.

electricity costs for Kaua'i ratepayers. As a result, since 2021, Kaua'i has consistently maintained the lowest electricity rates in Hawai'i and has been less exposed to rate volatility driven by oil price spikes.⁴ These rates reflect the island's increased implementation of fixed-price, long-term PPAs for renewable energy projects, such as Kaawanui, which allow for reduced exposure to volatile fossil fuel markets.

As Kaua'i continues to work toward the State's statutory mandate of a 100% renewable electricity generation by 2045, it must replace its existing fossil generation with new renewable capacity. The Project is estimated to meet 17.5% of Kaua'i's energy needs and divert over seven million gallons of fossil fuel annually; Kaawanui is estimated to displace 2,305,053 metric tons of carbon dioxide equivalent in greenhouse gas emissions over its 25-year PPA term. This reduction is equivalent to removing roughly 500,000 cars from the road for 1 year or planting 38 million tree seedlings and allowing them to grow for ten years.^{5,6}

Furthermore, the Project is under the purview of the Committing to Reliable Energy and Decarbonization Innovations on Time (CREDIT) Task Force established by Governor Green per Executive Order 25-10.⁷ Projects under CREDIT's purview are recognized as critical to the State's energy goals and warrant intergovernmental coordination of their respective review processes. Ensuring a low PPA for the Project depends on adhering to tight development timelines to maintain access to federal tax credits that can reduce costs, as provided in the PPA. Timely approvals are therefore important to ensure the Project remains on schedule and that these cost-saving benefits are realized.

Finally, AES Hawai'i has demonstrated its ability to develop solar projects on Kaua'i, having successfully brought online both the Lāwa'i and Kekaha solar and storage facilities.

Thank you for the opportunity to comment in support of this Project. If you have any questions, please contact Monique Zanfes at monique.m.zanfes@hawaii.gov.

Sincerely,



Mark B. Glick
Chief Energy Officer

⁴ Public Utilities Commission [FY 2025 Annual Report](#)

⁵ Letter to PUC Submitting Kaawanui GHG Analysis, Docket [2025-0198](#)

⁶ EPA Greenhouse Gas Equivalency Calculator

⁷ Executive Order 25-10, [2511019.pdf](#)