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March 6, 2026

Ka'āina S. Hull, Director
County of Kaua'i
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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*

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.

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
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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