

Hon. Sara C. Bronin
Chair

Jordan E. Tannenbaum
Vice Chairman

Reid J. Nelson
Executive Director



June 21, 2024

Honorable Charles F. Sams
Director
National Park Service
1849 C Street, NW
Washington, DC 20240

Ref: *Request for Section 213 Report Regarding the Lahaina National Historic Landmark District*

Dear Mr. Sams:

Pursuant to Section 213 of the National Historic Preservation Act (NHPA), 54 U.S.C. 304110, the Advisory Council on Historic Preservation (ACHP) requests that the National Park Service (NPS) provide an assessment of the boundaries and contributing structures of the Lahaina National Historic Landmark District (NHL) in Lahaina, Maui County, Hawaii.

As you are aware, the Lahaina wildfires on August 8, 2023, resulted in a devastating loss of life, but also caused significant property damage, including to buildings and sites that conveyed the historical significance of Lahaina. On August 10, 2023, President Biden determined that the damages from the wildfires were of sufficient severity and magnitude to warrant a major disaster declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act, [42 U.S.C. 5121](#) *et seq.* Since then, the Federal Emergency Management Agency (FEMA) and its Federal agency partners have been working to respond to the needs of residents while also providing necessary services, including installation of temporary housing and removal of debris and hazardous materials. In addition, the Chair of the ACHP and the ACHP's Tribal Member took the opportunity to visit the area in April 2024, given the significance of the affected historic resources and the magnitude of the loss.

However, as the transition from response to recovery activities begins, questions have been raised regarding the boundaries of the NHL, and what buildings and sites contribute to its significance. Further questions have been raised as to whether the District has achieved additional significance in the years since its designation as an NHL, and how to account for potential effects to the elements of historic integrity that relate to that expanded significance. In particular, we recognize that the original NHL designation may lack the perspectives of Native Hawaiian organizations, and a Section 213 report would provide an opportunity to explicitly incorporate their input into a revised statement of significance.

A Section 213 report would inform not just the recovery efforts that FEMA is leading, but also the work of other agencies who will contribute to the long-term rebuilding of Lahaina. Such a report will ensure that the historic preservation review mandated by Section 106 of the NHPA for these undertakings is as fully informed as reasonably possible about the historic fabric still remaining in Lahaina. Accordingly, we request that you provide a Section 213 report within 60 days of your receipt of this request, in accordance with the developed guidance for requesting and coordinating Section 213 reports between the ACHP and NPS. The report should address:

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 • Washington, DC 20001-2637
Phone: 202-517-0200 • Fax: 202-517-6381 • achp@achp.gov • www.achp.gov

- the national significance of Lahaina, including its significance to Native Hawaiians;
- what elements of integrity apply to the NHL, including contributing buildings and other character-defining features; and
- whether adjustments to the NHL's boundary are needed; and
- any recommendations for agencies as they assist in rebuilding Lahaina.

We understand that your Pacific West Regional Office may be asked to prepare the report and the ACHP and FEMA are able to assist in providing any additional information that may be needed. Jaime Loichinger, the Director for the Office of Federal Agency Programs, is managing the ACHP's oversight of the recovery in Lahaina, and is available to assist you if needed. She can be reached at (202) 517-0219 or via email at jloichinger@achp.gov. We are grateful for your assistance and look forward to receiving the report.

Sincerely,

A handwritten signature in black ink, appearing to read "Reid J. Nelson", with a long horizontal flourish extending to the right.

Reid J. Nelson
Executive Director