

## SECTION 213 REPORT

### Lahaina National Historic Landmark District, Lahaina, Maui, Hawai'i



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## TABLE OF CONTENTS

TABLE OF CONTENTS.....	i
LIST OF FIGURES .....	iii
LIST OF TABLES .....	iv
REPORT SUMMARY .....	v
INTRODUCTION .....	1
METHODS .....	3
SECTION 1: EXISTING NHL DOCUMENTATION .....	5
INTRODUCTION .....	5
STATEMENT AND PERIOD OF SIGNIFICANCE .....	5
IDENTIFICATION OF CONTRIBUTING RESOURCES .....	7
BOUNDARY .....	12
CHARACTER-DEFINING FEATURES .....	13
SECTION 2: ADDITIONAL CONTEXT AND RELATED PROPERTIES .....	15
NATIVE HAWAIIAN PERSPECTIVES ON LAHAINA SIGNIFICANCE.....	15
DOCUMENTED ARCHAEOLOGICAL SITES .....	25
SUMMARY .....	27
SECTION 3: THE LAHAINA WILDFIRE AND SUBSEQUENT EMERGENCY ACTIONS .....	29
SUMMARY OF SECTION 106 CONSULTATION .....	31
SECTION 4: ASSESSMENT OF EFFECTS .....	33
SUMMARY FINDING OF EFFECT .....	33
SCOPE OF THE ASSESSMENT.....	34
DETAILED ASSESSMENT OF EFFECTS.....	35
SECTION 5: INTEGRITY ASSESSMENT.....	44
SECTION 6: RECOMMENDATIONS TO AGENCIES .....	50
UPDATE THE NHL DOCUMENTATION.....	50
INTEGRATE HISTORIC PRESERVATION IN REBUILDING LAHAINA .....	51
STRENGTHEN CONSULTATION AND COLLABORATION .....	52
REFERENCES CITED .....	54

October 1, 2024

APPENDIX A. RECORDED ARCHAEOLOGICAL SITES WITHIN THE NHL BOUNDARY	
.....	61

October 1, 2024

## LIST OF FIGURES

Figure 1 Location of Lahaina NHL District on National Geographic TOPO! 1:24,000 USGS map (NPS). .....	1
Figure 2. “Principal” buildings and sites and other noted buildings, sites, and objects within the Lahaina NHL District .....	8
Figure 3. Photograph 5 from the 1974 NHL District nomination showing the Courthouse, which was extensively remodeled in 1929, and the reconstructed ruins of the Fort.....	10
Figure 4. Photograph 12 from the 1974 NHL District nomination showing view of the West Maui Mountains in December 1973 .....	13
Figure 5. Native Hawaiian places associated with the Lahaina NHL District .....	17
Figure 6. Native Hawaiian places, ponds, and other sites within the Lahaina NHL District .....	18
Figure 7. Pu‘ulaina cone from the site of Moku‘ula Island, looking north-northeast .....	19
Figure 8. Map showing destroyed buildings in Lahaina from the Maui Wildfires and select historic properties .....	30
Figure 9. South façade of the Baldwin House showing fire damage and shoring.....	33
Figure 10. West façade of former financial institution at 712 Front Street, facing east.....	36
Figure 11. West façade of the Spring House with debris field in foreground and Pa‘upa‘u Hill and the West Maui Mountains in background .....	38
Figure 12. United States Marine Hospital, looking northeast .....	39
Figure 13. Standing walls of the Waine‘e Church with graves in foreground, facing west .....	42
Figure 14. Site of Moku‘ula Island and Loko o Mokuhinia with remains of the Waine‘e Church in the background, looking east.....	43
Figure 15. A surf break taken from the site of site of Hale Piula within the Lahaina Roads anchorage with the Island of Lanai in the background.....	48

October 1, 2024

## **LIST OF TABLES**

TABLE 1. PRINCIPAL BUILDINGS, STRUCTURES, AND SITES IDENTIFIED IN THE 1974 NOMINATION.....	7
TABLE 2. OTHER BUILDINGS, SITES, AND OBJECTS REFERENCED IN THE 1974 NOMINATION.....	11
TABLE 3. ASSESSMENT OF EFFECTS TO PRINCIPAL BUILDINGS, STRUCTURES, AND SITES .....	40

October 1, 2024

## REPORT SUMMARY

### INTRODUCTION

The National Park Service (NPS) administers the National Historic Landmark (NHL) Program on behalf of the Secretary of Interior (36 CFR § 65.1(c)). This includes identification of potential NHLs, assisting proponents in writing and updating NHL nominations, monitoring the condition of NHLs through technical assistance to owners and stewards and participation in Section 106 consultation on federal undertakings with the potential to adversely affect an NHL (36 CFR § 65.3(j) and 36 CFR § 800.10(c)).

In accordance with Section 110(f) of the National Historic Preservation Act and implementing regulations (36 CFR § 800.10), federal agency officials are required, *“to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.* The agency is also required to *notify the Secretary of the Interior of any consultation involving a National Historic Landmark and invite the Secretary to participate in the consultation where there may be an adverse effect”* (36 CFR § 800.10(c)). Under the same regulatory citation, the Advisory Council on Historic Preservation (ACHP), may request a Section 213 report from the Secretary. Consultation and preparation of 213 reports are delegated to the NPS.

### Request from ACHP

On June 21, 2024, the ACHP requested from the Secretary of the Interior preparation of a Section 213 report as permitted under the National Historic Preservation Act and implementing regulations (36 CFR 800.10(c)). An ACHP request for a 213 report typically occurs during Section 106 consultation for a proposed federal undertaking. As established by the National Historic Preservation Act, Section 213 reports detail the significance of a historic property, describe the effect of any proposed undertaking on the property, and recommend measures to avoid minimize, or mitigate adverse effects. The circumstances for the current request are somewhat different. At the time of the ACHP request, the Lahaina NHL had been impacted by the August 8, 2023, Maui wildfires and the federal agencies’ response and recovery efforts to the catastrophic fires, which constitute the undertakings, were already underway and they continue.

Within this context, the ACHP specifically requested the report to address:

- the national significance of Lahaina, including its significance to Native Hawaiians (**Significance**),
- what elements of integrity apply to the NHL District, including contributing buildings and other character-defining features (**Integrity**),
- whether adjustments to the NHL boundary are needed, (**Boundary**) and
- any recommendations for agencies as they assist in rebuilding Lahaina (**Recommendations to Agencies**)

October 1, 2024

The ACHP request included the standard sixty-day timeline for completion in accordance with the developed guidance for requesting and coordinating Section 213 reports between the ACHP and NPS. Given the complexity of the undertakings and scope of the report, the NPS requested and received an additional forty-five days.

## **METHODOLOGY/APPROACH**

The findings and recommendations in this report are grounded in research that included review of secondary sources and reports, the existing NHL documentation, two information sharing sessions with Native Hawaiian Organizations and members of the Native Hawaiian Community of Lahaina, and onsite visits to the NHL. The preparers of this report also were informed by standard NHL program guidance provided in the *2023 NHL Bulletin; Guidelines for Preparing National Historic Landmark Nominations* (NPS 2023).

## **UNDERTAKINGS**

Federal Emergency Management Agency (FEMA), with their mission-assigned partner agencies, including Environmental Protection Agency (EPA) and US Army Corps of Engineers (USACE) conducted a Phase 1 removal of hazardous materials (EPA) and are continuing a Phase 2 consolidated debris removal program (USACE). Consolidated debris removal from residences, commercial, and public buildings, includes removal and disposal of (1) surface ash, (2) burned debris, (3) hazardous materials not removed in Phase 1, (4) hazardous trees and unsupported walls that are hazardous to debris removal crews; (5) vehicles, marine vessels, and marine debris (6) structural footings, foundations, chimneys, and basements; (7) hazardous trees that pose a risk of imminent threat of falling on the public right-of-way (ROW), or other public improved property; (8) contaminated soil based on soil sampling, (9) commercial structures, to include ash, burned debris, foundations, and basements; and (10) demolition of “clearly destroyed” private residential and commercial structures. Phase 2 undertakings are ongoing.

## **STATUS OF EXISTING NHL NOMINATION**

Lahaina was designated an NHL District on December 29, 1962, as a place having exceptional value and of national significance in commemorating and illustrating the history of the United States under the themes Political and Military Affairs, 1865–1912, and Special Study: Hawaii History 1778–1910 (Hussey 1962: 206; NPS 1963). In 1974, the NPS accepted nomination documentation for the Lahaina NHL that delineated an official boundary, established a period of significance, and referenced additional resources associated with the NHL District and setting. Sometimes referred to as an update, the 1974 documentation also reiterated the three areas of significance previously identified in the 1962 site survey for Lahaina NHL.

The Lahaina NHL District nomination is over fifty years old and is a product of the standards and practices of the NPS at the time it was written. While it did not cite the NHL criteria as documentation would today, absent updated documentation approved by the Secretary of the

October 1, 2024

Interior, the 1974 nomination stands as the official record of the NHL boundary, period of significance, and areas of significance. Additionally, per current NHL Program guidance, contributing resources considered in this Section 213 report include those referenced in the 1974 NHL documentation, as well as additional resources identified after 1974 that are associated with the NHL areas and period of significance.

## FINDINGS AND RECOMMENDATIONS

### SIGNIFICANCE – Findings

- **An NHL nomination update is needed to better reflect current interpretations grounded in Native Hawaiian language sources, epistemologies, and other scholarship.**

The 1974 NHL nomination attributes Lahaina’s significance to its role as a Hawaiian royal residence and capital, a whaling port, and a center for missionary activity in the nineteenth century. While acknowledging Lahaina’s association with Hawaiian royalty, the nomination prioritizes focus on the latter two themes. Native Hawaiians, including members of the royal family who ruled from Lahaina, are attributed limited agency, and are largely characterized as acquiescent to Western influences.

Scholarship published since 1974 provides for a more complete and nuanced understanding of Lahaina’s historic significance that centers Hawaiian perspectives and experiences and can serve as a basis for reframing Lahaina’s national significance as an important spiritual, cultural, and political center from the time of the Maui kingdom, through the period of the Hawaiian monarchy, up to the present day.

See Section 2 of this report for additional information.

- **If an NHL nomination update is pursued, it will be important to consider the relative significance of sugar cane plantation agriculture and canneries, whether the significance and associated resources meet NHL Criteria, and whether further refinement of the areas and period of significance for the Lahaina NHL would be warranted.**

The 1974 nomination does not attribute national significance to the theme of sugar-cane plantation agriculture and canneries in the nineteenth and twentieth centuries. The nomination includes town blocks within the boundary as part of the setting of the Lahaina NHL that likely included resources associated with this context; however, no specific buildings within these blocks are identified in the nomination as associated with the areas of significance and many of the buildings and structures within these blocks fall outside the period of significance. These include resources associated with the many immigrants who came to the Hawaiian Islands in search of wage work and other opportunities in the early twentieth century, including Chinese, European, Filipino, Japanese, Okinawan, Portuguese, and others.



October 1, 2024

### INTEGRITY – Findings

- **Based on the NPS assessment, the Lahaina NHL District appears to retain a high degree of integrity, particularly the aspects of location, setting, feeling, and association.**

While the destructive impacts of the fire on the built environment resulted in diminished integrity of materials, design, and workmanship of many contributing buildings, other resources such as subsurface archaeological sites and sites associated with important events and individuals from pre-unification Hawai‘i through the monarchy period were not significantly impacted by the wildfire and continue to convey their historic and cultural significance.

Some stone and coral walls of historic buildings were damaged but did not collapse and remain standing. The ocean portion of the NHL District essentially was not impacted except perhaps in the very near shore where pilings and vessels burned, or debris fell. The visual relationships between contributing resources also remain largely intact, adding to a high degree of overall integrity for the district.

Additional considerations related to the historic character of the Lahaina NHL District built environment inform this assessment. See Section 5 of this report for additional information.

### BOUNDARY – Findings

- **The boundary for the Lahaina NHL (District) should be studied as part of an update to the NHL nomination.**

An update to the nomination would address new archaeological, architectural, historical, and Native Hawaiian cultural information as it pertains to the national significance of the NHL District. Since the 1974 Lahaina NHL nomination, researchers have conducted archaeological, historical, ethnohistorical, and oral history studies that have identified additional resources and character-defining features associated with the national significance that are located within and outside the present NHL boundary.

Potential boundary adjustment would consider all contributing resources including those identified since 1974; this could involve expansion of the boundary.

See Section 6 of this report for additional information.

### RECOMMENDATIONS to AGENCIES

- **AGENCIES ENCOURAGED to SUPPORT NHL NOMINATION UPDATE**
- **INTEGRATE HISTORIC PRESERVATION IN REBUILDING LAHAINA: In accordance with 36 CFR § 800.10, agencies should “to the maximum extent**

October 1, 2024

**possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking,” including actions, and planning such as:**

- Support for the identification, retention, and preservation of archaeological and historic sites and landscape features that contribute to the historic character and cultural significance of the NHL, including character-defining features of building sites and the district,
  - Support for undertakings that:
    - retain historic relationships,
    - preserve important views or visual relationships,
    - minimize impacts to historic spatial relationships,
    - avoid important archaeological sites and landscape features when considering new construction,
    - balance the need for new construction and compatibility with the historic character of the NHL and the setting.
  -
- **INTEGRATE HISTORIC PRESERVATION IN REBUILDING LAHAINA – We recommend that agencies with undertakings that will adversely affect the Lahaina NHL District, propose mitigation that is preservation focused, such as:**
- Establish and support a mitigation preservation fund,
  - Support the planning and development of a preservation plan for Lahaina that addresses all resources that contribute to the significance of the NHL District,
  - Support development of an archaeological overview and assessment to summarize past information holistically,
  - Collaborate with local and state agencies, Native Hawaiian Organizations, and the Native Hawaiian Community of Lahaina to plan and implement specific historic preservation projects in the NHL that are carried out in accordance with the Secretary of the Interior’s Standards for the Treatment of Historic Properties.
- **STRENGTHEN CONSULTATION AND COLLABORATION – Through actions such as:**
- Implement cultural sensitivity training and cultural monitoring,
  - Include cultural practitioners and traditional construction techniques/trades in Native Hawaiian preservation projects,
  - Timely identification/documentation of Native Hawaiian archaeological and cultural sites,
  - Early recognition and planning for the likelihood of encountering burials and preparing and following plans to avoid burials or address inadvertent discovery,

October 1, 2024

- Engage knowledgeable specialists in pre-nineteenth and later archaeological resources,
- Ensure that archaeological collections, including artifacts and records address curation standards and will be curated in an appropriate repository per 36CFR § 79,
- Interpret the unique history of Lahaina incorporating the perspectives of Native Hawaiian people and local families.

See Section 6 of this report for additional information regarding recommendations to agencies

October 1, 2024

## INTRODUCTION

Lahaina National Historic Landmark (NHL) was designated by the Secretary of the Interior on December 29, 1962, and is a historic district within the town of Lahaina on the west coast of Maui, in the County of Maui, Hawai‘i.<sup>1</sup> Its boundary is within the coastal plain associated with the west-facing slopes of the West Maui Mountains, adjacent to the ocean, and it extends into the ‘Au‘au Channel within the “Lahaina Roads” anchorage (Figure 1). The lands are within the



*Figure 1 Location of Lahaina NHL District on National Geographic TOPO! 1:24,000 USGS map (NPS).*

<sup>1</sup> This report follows *Place Names of Hawai‘i* and the Geographic Names Information System (GNIS 2022), spelling for Lahaina instead of the traditional term, Lāhainā, which has been used in some reports. Hawaiian place names follow Pukui et al. (1975).

October 1, 2024

traditional Native Hawaiian land designation, *Moku* of Lāhainā, with the northern and central portions within *Ahupuaʻa* Paunau and the southernmost portion within *Ahupuaʻa* Pūehuehu Nui. Traditionally, the *Ahupuaʻa* of Wainē contained a discontinuous section that crossed from the waterfront through the interior between the two *Ahupuaʻa* at the island of Mokuʻula and including much of its surrounding pond, Loko o Mokuhinia (Klieger 1998). The NHL is currently owned by a mixture of public agencies, non-profit organizations, and private corporations and individuals.

The combined Lahaina, Kula, and Olinda Hawaiʻi Wildfires were among the most destructive in Hawaiʻi history, with the Lahaina fire burning over 2,000 acres. Between August 8–11, 2023, this wildfire spread through the town of Lahaina destroying many buildings and resulting in over 100 deaths. On August 10, President Biden issued a major disaster declaration under the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 *et seq.*). As part of its response to this disaster, the Federal Emergency Management Agency (FEMA) contracted with the U.S. Army Corps of Engineers (USACE) to remove debris left by the fires. In some cases, USACE will install shoring prior to debris removal to protect the crews working in them while retaining remaining historic fabric for selected historic buildings named in the NHL District documents, as well as other important historic buildings. FEMA requested the USACE Technical Center of Expertise for the Preservation of Historic Buildings and Structures (TCX) to evaluate these buildings for feasibility for rehabilitation and to develop bracing and shoring plans. Other actions associated with the cleanup include removal and disposal of ash and debris, hazardous waste, chimneys, trees, and unsupported walls and concrete foundations. As part of the cleanup, the U.S. Environmental Protection Agency (EPA) also surveyed and removed hazardous materials from properties impacted by the wildfire. In addition, the FEMA project installed temporary housing for the survivors of the fire. This latter undertaking is outside of the boundary of the NHL and is not considered in this report.

On June 21, 2024, Reid J. Nelson, the Executive Director of the Advisory Council on Historic Preservation (ACHP) requested Charles F. Sams, Director of the National Park Service (NPS), to produce a report to assess the boundary and contributing historic resources of the Lahaina NHL District, consistent with the National Historic Preservation Act (54 U.S.C. § 304110).

This type of report, referred to as a “Section 213 report” details the significance of historic properties listed as NHLs and the effects of proposed undertakings on them, providing recommendations on measures to avoid, minimize, or mitigate adverse effects.<sup>2</sup> The ACHP specifically requested that the report for the Lahaina NHL District address:

- the national significance of Lahaina, including its significance to Native Hawaiians;

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<sup>2</sup> The “213” refers to the National Historic Preservation Act of 1966 as amended, where Section 213 identifies the process for the ACHP to request an evaluative report from the Secretary of the Interior, now codified in Title 54 U.S.C. § 304110.

October 1, 2024

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

## METHODS

NPS methods for addressing the ACHP request include an evaluation of the existing NHL documentation, a literature review, site visits, information sharing sessions with Native Hawaiian Organizations and members of the Native Hawaiian Community of Lahaina, and information provided by other federal agencies, state and local government offices, non-profits, and cultural resource professionals. Because the Lahaina NHL District nomination is over fifty years old, much of the critical information included in NHL nominations today was not included; it is not consistent with current practice, and requires analysis of narratives on significance, condition, and boundary justification from the 1974 nomination documentation. Historic sites with no surface manifestations identified in the nomination did not have assessments of integrity specific to the NHL District, and in most cases, archaeologists had not yet confirmed that intact archaeological resources were present for these sites.

Furthermore, substantial historic preservation work has occurred within the NHL District and its vicinity since 1974. This includes archaeological and built-environment surveys, as well as National Register of Historic Places (NRHP) nominations and determinations of eligibility for individual properties. This report has relied on the 1974 NHL nomination, including the supplemental materials included in the National Archives and those available secondary sources, including materials provided directly by FEMA, Hawai'i State Historic Preservation Division (SHPD), County of Maui, and other cultural resources professionals involved in the FEMA undertakings. These include archaeology, architecture, history, ethnohistory, ethnography, and cultural assessment surveys and evaluations. In addition, NPS held information sharing sessions with Native Hawaiian Organizations and members of the Native Hawaiian Community of Lahaina in late July (in-person) and mid-August (virtual). Participants provided additional information to augment the other sources.

Importantly, the time allotted to prepare the Section 213 report was limited and the team could not conduct a comprehensive review of all available sources. In addition, other studies and assessments, including archaeological and cultural impact surveys, and oral history interviews, are being produced as part of the FEMA undertakings and were not completed or available for consideration in this report.

This report does **not** update the nomination or change its boundary. Any update to the nomination including any alteration in boundary would have to follow the appropriate process for any nomination as an NHL, including internal NPS and peer review, and approval by the NHL Committee, National Park System Advisory Board, and Secretary of the Interior (NPS 2023; 36 CFR § 65.8).

October 1, 2024

This Section 213 report is composed of six sections to address the request of the ACHP. Section 1 reviews the 1974 nomination and its supporting documentation. We evaluate the 1974 NHL nomination in terms of what it documents about national significance, its boundary, boundary justification, and contributing resources. Section 2 addresses NHL **significance**, identifying additional contributing properties that have been documented since the 1974 nomination, and discusses cultural and historic contexts, including more nuanced analysis of contributing resources noted in the 1974 documentation. Section 3 describes the wildfire and subsequent emergency undertakings by FEMA and its other federal agency partners. Section 4 identifies the impacts of the wildfire and the actual or expected effects of FEMA undertakings on the NHL District, while Section 5 evaluates the **integrity** of the Lahaina NHL District after the wildfire and associated ongoing undertakings. The report concludes in Section 6 with recommendations on updating the NHL documentation, including updating its **boundary**, and also provides **recommendations** for agencies who will assist in rebuilding Lahaina to avoid, minimize, or mitigate adverse effects resulting from undertakings subject to Section 106 review.

October 1, 2024

## **SECTION 1: EXISTING NHL DOCUMENTATION**

### **INTRODUCTION**

Lahaina was designated an NHL District on December 29, 1962, as a place having exceptional value and of national significance in commemorating and illustrating the history of the United States under the themes Political and Military Affairs, 1865–1912 and Special Study: Hawaii History 1778–1910 (Hussey 1962: 206; NPS 1963). The NPS accepted nomination documentation for the district in 1974, reiterating three areas of significance previously identified in a 1962 site survey, delineating a boundary, and establishing a period of significance. It also referenced additional sites, buildings, and an object associated with the Lahaina NHL District and its setting. Absent updated documentation approved by the Secretary of the Interior, the 1974 nomination stands as the official record of the NHL boundary, period of significance, and areas of significance.

The Lahaina NHL District nomination is over fifty years old. It is a product of the standards and practices of the NPS at the time it was written. The 1974 NHL nomination was prepared on the inventory form used for all National Register properties at the time, and the nomination did not cite the NHL criteria as documentation would today. The period of significance was denoted by check box as the entire nineteenth century, and there was no language specific to contributing and noncontributing resources, including buildings, structures, sites, and objects. As such, much of the necessary information has been extracted from the narrative on significance and the NHL boundary in the 1974 nomination documentation. In some instances, information is inferred and noted as such. This section reviews the statement and period of significance, contributing resources, boundary, and character-defining features of the NHL District based on the 1974 nomination.

### **STATEMENT AND PERIOD OF SIGNIFICANCE**

The primary focus of the 1974 nomination was to establish a boundary for the Lahaina NHL District and the document reflects this purpose. Most of the significance statement in the 1974 nomination is quoted verbatim from the 1962 site survey, which had identified three areas of significance—whaling, the Hawaiian monarchy and related political transitions, and missionaries. The significance associated with the whaling industry (1830–1860) featured prominently; however, the importance of the monarchy’s presence in Lahaina, the longevity of that presence, and the missionaries’ dependence on the political and social power of the monarchy are conveyed in the significance statement, albeit with an overlay of European American centrism. The core elements of the statement of significance under each theme or area are excerpted below.

#### **Whaling**

It [Lahaina] seems to be the key site for illustrating and commemorating one of the broad factors which resulted in the Americanization of Hawaii and which helped lead eventually to



October 1, 2024

the annexation of the islands by the United States – the whaling industry. [Hussey 1962: 206; see Apple 1974: 9].

### **Hawaiian Monarchy/Political Center**

In addition, Lahaina was the royal residence and capital during much of the critical period when Hawaii was changing from a feudal autocracy to a constitutional monarchy, and it was associated with many of the key events of that transition. . . According to tradition, Lahaina was from time immemorial a favorite residence of Maui kings and chiefs and a convenient port for inter-island travelers. [Apple 1974: 10–11; Hussey 1962: 206]

Kahekili [II], Kamehameha I, Kamehameha II, Queen Keōpūolani, Kamehameha III, and Queen Ka‘ahumanu are specifically mentioned within this theme.

### **Missionaries**

Another event which was to have much effect upon the growth and social structure of Lahaina was the arrival of the first missionaries in the islands during 1820 . . . [and] the development of a particularly influential mission under the protection of some of the most powerful chiefs of the land. [Apple 1974: 11; Hussey 1962: 207]

The significance narrative developed in 1962 was prefaced in 1974 with a new, brief summary of national significance. The summary draws focus on the role of American whalers, businessmen, and missionaries in the annexation of Hawai‘i and Lahaina as a place where the atmosphere of a nineteenth century Hawaiian seaport is preserved; however, all three areas of significance stated in the site survey and carried forward in the nomination constitute the established statement and areas of significance for the Lahaina NHL District. The period of significance was marked on the 1974 form as the nineteenth century and specific dates are noted in the narrative.

### **Analysis**

The current (1974) significance statement gives a certain amount of primacy to the whaling industry over other themes, including the extensive history of Maui and the Hawaiian monarchy in Lahaina prior to the nineteenth century. This emphasis does not negate national significance in the other two areas and the significance of the earlier history is revealed in the narrative; however, it is not fully analyzed and is considered primarily within the context of actions by Western actors and colonialization. This limited focus is likely the reason why the period of significance was identified as only the nineteenth century. Additionally, the nomination does not fully evaluate the significance or agency of Native Hawaiians and the Hawaiian monarchy after 1840, nor does it adequately include Native Hawaiian perspectives regarding the significance of Lahaina.

October 1, 2024

## IDENTIFICATION OF CONTRIBUTING RESOURCES

The 1974 nomination discusses buildings, structures, sites, and an object associated with the NHL’s national significance in an unclear manner. It includes the excerpted list and descriptions of the “nine principal sites and historic structures then visible” that were identified in the 1962 sites survey and references “Lahaina, A Walking Tour of Historic and Cultural Sites” brochure (County of Maui Historic Commission 1972), which is described as containing a list of these principal resources “and additional ones.” A few of these locations fall outside of the Lahaina NHL District boundary and/or period of significance. Additionally, the update references the two historic districts that were established by the County of Maui in 1967 and includes a copy of the “Lahaina Historic Districts Map, dated and revised March 22, 1967.” This map also identifies a number of sites, including many of those in the walking tour brochure and other sites identified from historic maps and other sources. However, the 1974 nomination does not include a comprehensive list of buildings, sites, structures, or objects that contribute to the NHL.

Eight of the nine “principal” buildings and sites listed in the 1974 nomination were also included in the walking tour brochure identified in the nomination (Table 1, see Figure 2). The Old Spring House was omitted. As they are specifically listed, these are clearly contributing resources to the NHL District.

**TABLE 1. PRINCIPAL BUILDINGS, STRUCTURES, AND SITES IDENTIFIED IN THE 1974 NOMINATION**

No.	Name	Notes
1	The Baldwin House (1835)	Community center in 1962, restored as a house museum and grounds by the Lahaina Restoration Foundation
2	Old Spring House (1823)	Privately-owned structure
3	Court House (1859–1929)	State-owned, site of the old stone fort, WPA landscaped park, 1871 Banyan tree
4	Old Prison (Hale Pa’ahao, 1858)	County-owned, constructed from coral blocks from old stone fort, WPA reconstructed gate house, reconstructed again in 1959
5	Waine’e Church (1828) & Cemetery (1823)	Damaged by wind in 1858, burned in 1894, renamed Waiola, 1953 church building discussed in nomination
6	Hale Aloha Church (1858)	On site of 1823 stone church; ruin in 1962; planned restoration in 1974
7	United States Marine Hospital (ca. 1842)	Purchased by Lahaina Restoration Foundation, planned restoration/reconstruction in 1974
8	Roman Catholic Church (Maria Lanakila - Our Lady of Victory, 1927–28)	On site of 1846 church, replica of 1858 church
9	Pioneer Hotel (1901)	Expansions in 1965 compatible with original

October 1, 2024

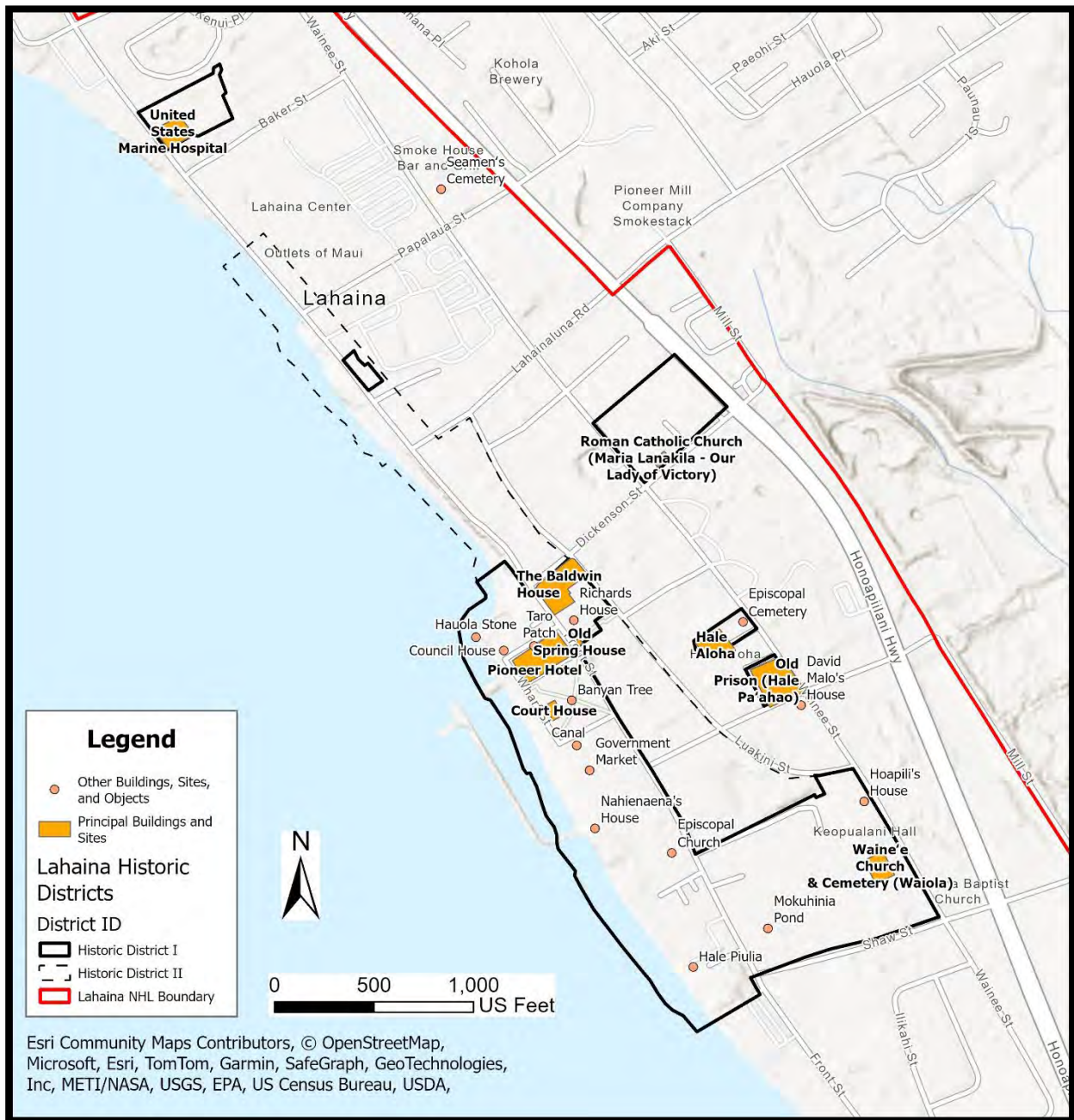


Figure 2. “Principal” buildings and sites and other noted buildings, sites, and objects within the Lahaina NHL District. Note that the Master’s Reading Room is included within the Baldwin House polygon, Mokuhinia Pond was identified by a point in the walking tour brochure, and Luakini Street is associated with the Princess Nāhi‘ena‘ena’s funeral procession (see Table 2). This map represents an inset, but not the entirety of the NHL District boundary, which can be referred to in the Introduction.

October 1, 2024

Importantly, in 1974, many of these buildings were in various states of preservation, including highly altered buildings, replicas, or ruins, with only the Baldwin House and Hale Pa‘ahao restored and/or reconstructed at the time (Figure 3). The United States Marine Hospital and ruins of the Hale Aloha Church were planned for restoration by the Lahaina Restoration Foundation, and the Court House, Waine‘e Church, and Roman Catholic Church (Maria Lanakila First Catholic Church) were extensively remodeled or entirely rebuilt in the twentieth century (see Table 1). In addition, the Pioneer Hotel, which dates to 1901, had a large addition in 1965 that was considered compatible with the historic wing of the building.

In addition to the nine properties listed in Table 1, the 1974 nomination identified and briefly described the Master’s Reading Room, the Lahaina Anchorages, and the replica ships *Carthaginian I* and *II*. Additional resources identified on the walking tour brochure and county historic district maps are not individually listed or described in the “Physical Description” section of the nomination form. However, the sites of Kamehameha I’s Brick Palace, the royal compound at Moku‘ula, and other sites associated with the monarchy period are depicted in the photographs submitted with the nomination (See Figure 3 for an example). Photos of the Master’s Reading Room, the *Carthaginian II*, and a sign marking the Seamen’s Cemetery are also included.

Current NHL Program guidance states that for NHLs that pre-date the 1986 NHL nomination form, individual resources within an NHL district’s boundary that are not expressly listed in its nomination should be considered contributing to the NHL if they are within the NHL’s (1) area(s) of significance and (2) period(s) of significance (NPS [2023: 36–37]; and Lisa Davidson, email “Response from NHL Program re: status of Lahaina NHLD” to the County of Maui Councilmembers Jordan Hart and Nohe M. Uu-Hodgins, November 1, 2023). Thus, these additional buildings, sites, structures, and objects located within the boundary and meeting these criteria should be considered contributing to the Lahaina NHL District. Table 2 lists these other buildings, sites, and object (see Figure 2).

Notably, many of these were sites associated with the pre-unification and nineteenth century Native Hawaiian royal complex with only a few buildings, cemeteries, or sites directly associated with missionaries or whaling. In 1974, only one of these sites, the Brick Palace, had been subject to archaeological assessment. The two additional buildings represented an adaptive rehabilitation of a historic structure (Master’s Reading Room) and a rebuilt church (Episcopal church).

Sites within the NHL but outside of the nineteenth-century period of significance for the NHL District and referenced in the walking tour brochure include, the plantation-era Zen Church, the Buddhist Hongwanji Mission, and the Chee Kung Tong (Wo Hing) society house. As noted above, two whaling exhibit vessels, the *Carthaginian I*, a replica barkentine, and the *Carthaginian II*, a replica brig, were mentioned in the 1974 NHL nomination. The *Carthaginian I* previously foundered on the Lahaina reef and was towed to deep water while the 1974 nomination indicated that the *Carthaginian II* with its metal hull did not “conform to



October 1, 2024

mid-19<sup>th</sup> century Hawaiian seaport authenticity” (Apple 1974: 5–6; Fox 1985: 237–239; McConkey 1968). *Carthaginian II* was sunk in 2005 as an artificial reef (Kubota 2005).

Outside of the NHL boundary, the walking tour brochure mentioned the Hale Pa‘i printing house at Lahainaluna School, which is within the period of significance, and the Statue of Buddha near Mala Wharf. The latter was placed at the centennial of Japanese immigration to Lahaina at the start of the plantation period. The nomination also notes a nearby twentieth century Japanese cemetery, also outside the period of significance.



*Figure 3. Photograph 5 from the 1974 NHL District nomination showing the Courthouse, which was extensively remodeled in 1929, and the reconstructed ruins of the Fort. 1974 Description: “Court and Custom House, on site of the fort. Corners of fort have been reconstructed in the foreground and background. Kamehameha III school, extreme background, is on sites of government market, canal, and home of Princess Nāhi‘ena‘ena, daughter of Kamehameha the Great. NPS photo taken December 12–13, 1973.*

Other sites shown on the County Map that are not included in the nomination directly or in the walking tour brochure include a number of fishponds, the former Kapahumanamana Stream, the Keawaiki Landing, the Royal Surfing Grounds, and Surf of Uo (see Section 2). In addition, the map marked several sites described as “former historic sites” identified from a Town of Lahaina Map dated 1884: Hawaiian Ship Market Place, Bowling Alley, French Hotel, Beer

October 1, 2024

Shop, Peck Store, Baldwin Canoe House, Hawaiian Market Place, Hoapili and Malo Canoe Log, Slaughterhouse, Governor's Mansion, Gilman's Store/Aunea's House, Custom House Post Office, Bolles' Stonehouse, Bolles' House, Hale Kamani, Kia, Emma's House, and Fanny Young's House. The location of the flagstaff directly makai of the Courthouse was identified on the map as "cannons." The county map also showed important landscape features including the canal and basin, fishponds (including named ponds, Loko o Mokuhinia, Loko o Hoolili, and Loko o Kaalolo), and the Banyan tree. While identified on the County Map, it is unclear if the intent of including the map in the 1974 nomination was to show these as contributing resources to the NHL District. Regardless, if they retain sufficient integrity and are associated with the area(s) and the period of significance, they would be considered contributing resources to the NHL District.

**TABLE 2. OTHER BUILDINGS, SITES, AND OBJECTS REFERENCED IN THE 1974 NOMINATION**

<b>Name</b>	<b>Area of Significance</b>	<b>Type</b>	<b>Notes</b>
Master's Reading Room (1833)	Missionaries	Building	Adaptive reuse for offices by the Lahaina Restoration Foundation in 1974; Nearby site of Seamen's Chapel;
Richards House Site	Missionaries	Site	Adjacent to Baldwin House
Princess Nāhi'ena'ena procession (1837)	Monarchy	Site	Site of funeral procession along Luakini Street
Episcopal Cemetery	Monarchy	Cemetery	Grave of Walter Murray Gibson, 1880s minister to King Kalakaua
David Malo's House	Monarchy	Site	Location of significant person in Hawaiian history, note grave site
Hoapili's House	Monarchy	Site	Precontact to ca. 1840; Governor of Maui house site
Mokuhinia Pond	Monarchy	Site	Location of Moku'ula and tomb site within freshwater pond
Hale Piula (1830–1848)	Monarchy	Site	Built as palace, served as courthouse for the monarchy
Nāhi'ena'ena's House (1818–1836)	Monarchy	Site	Site of Princess Nāhi'ena'ena's house
Episcopal Church	Missionaries	Building	Rebuilt in 1927
Government Market	Monarchy	Site	Site of the government market
Canal (1840s)	Whaling	Site	U.S. Consular Office Canal
"Brick Palace" (1800)	Monarchy	Site	Archaeological site of Kamehameha I's palace and storehouse
Council House	Monarchy	Site	Site of Hawaiian monarchy Council House
Kupukaiao Taro Patch	Monarchy	Site	Site of King Kamehameha I's taro patch
Hauola Stone	Monarchy	Object	Precontact to monarchy sacred place
Seamen's Cemetery	Whaling	Cemetery	Graves of nineteenth century seamen

October 1, 2024

## Analysis

The 1974 nomination identifies the buildings, structures, objects, and sites associated with the significance of the NHL in a manner that lacks clarity; however, the boundary considerations section of the update and specific reference to and inclusion of the walking tour brochure and county historic districts map provide enough information for a clearer understanding of what resources were considered contributing to the NHL in the 1974 nomination leading to how the boundary was created.<sup>3</sup>

## BOUNDARY

NHL boundaries are established based on the location of historic and cultural resources associated with national significance that were extant during the period of that significance. The approach used to establish the boundary of the Lahaina NHL District was geographically expansive and informed by the perceived historic character, setting, spatial use, views, and vistas as they related to the significance of the NHL. The NHL boundary defined in 1974 encompasses 1,671 acres, which includes 1,333 acres of ocean and 305 acres of land. As stated under boundary considerations, this was delineated to include “historic sites, buildings, objects and archaeological features [and] architectural elements” within the County of Maui Historic District 1, the architectural elements that comprise the County of Maui Historic District 2, the anchorage that defined Lahaina as a seaport, the waterfront along which boats landed, and “sufficient town blocks outside the Maui County Historic Districts to include protection of the “near’- sight zone of the setting” to preserve views to scenic, rural, natural, and marine places (Apple 1974: 6–7). The “near’-sight” zone maintained the character of the setting, while providing a “far’-sight” zone that allowed visibility of the West Maui Mountains, irrigated agricultural lands to the east, and seaward-facing views to Lāna‘i across the ‘Au‘au Channel. Per current NHL Program guidance, the nine buildings and sites specifically identified in the nomination and the other resources referenced that are associated with the areas and period of significance are contributing to the NHL (see Tables 1 and 2). It appears these helped to justify the boundary for the NHL District in 1974.

In preparing this Section 213 report, NPS used the mapped boundary on the USGS topographic map provided in 1974, with the polygon boundary roughly adhering to the verbal boundary description provided by Apple (1974: 7–8, 62), and using parcel data from the Hawaii Geoportal (<https://geoportal.hawaii.gov/datasets>) and the georeferenced 1956 Lahaina, HI USGS Quad map. The boundary traced the edges of roads (a former road in one case) and other features that conform closely with that described in 1974 (see Figure 1).

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<sup>3</sup> The NHL boundary considerations section of the update is similar to what we would today call a boundary justification.

October 1, 2024

## CHARACTER-DEFINING FEATURES

As described in 1974, the Lahaina NHL District character-defining features include the spatial organization and circulation patterns, such as the tree-lined street grid, especially Front Street and surrounding the downtown business district, government buildings, and parks. In 1974, Front Street architecture retained the character of the nineteenth-century port and new construction within the County of Maui historic districts was compatible with this architectural theme. Surrounding neighborhoods contained single-family homes, churches, cemeteries, and grounds, some open lots, quiet tree-lined streets, and some sugarcane fields on the edge of the NHL. Roof heights were well-below the treetops and abundant greenery grew in the house lots. Residential areas emphasized a quiet and peaceful atmosphere with a more active downtown Lahaina business district. The setting of Lahaina also preserved “vistas of the West Maui mountains” and views to Lāna‘i across the ‘Au‘au Channel (Figure 4). Features detracting from



*Figure 4. Photograph 12 from the 1974 NHL District nomination showing view of the West Maui Mountains in December 1973. 1974 Description: “Looking mauka, from near corner of Dickenson and Wainee streets; West Maui mountains in background.” NPS photograph taken December 12–13, 1973.*



October 1, 2024

the historic scene were identified under “Description” and “Condition of the Site” as paved streets, curbs, new buildings in contemporary architectural styles, and other new development, including shopping centers and high-rise condominiums on the edges of the County of Maui historic districts (Apple 1974: 3, 17).

October 1, 2024

## **SECTION 2: ADDITIONAL CONTEXT AND RELATED PROPERTIES**

Since the 1974 Lahaina NHL nomination, researchers have conducted archaeological, historical, ethnohistorical, and oral history studies that have identified additional resources and character-defining features within and outside the present NHL boundary. Some researchers have recognized additional cultural significance of properties identified in the 1974 nomination, particularly as it pertains to Native Hawaiian history. As noted in Section 1, for NHLs that pre-date the 1986 NHL nomination form, individual resources within an NHL district's boundary that are not expressly listed in its nomination should be considered contributing to the NHL if they are within the proposed area(s) and period(s) of significance. Many of the recently identified and evaluated resources are associated directly with the period and significance of the NHL and therefore contribute to its integrity. Some researchers have identified historic properties that fall outside of the nineteenth-century period of significance, outside the NHL boundary, or outside the areas of significance. These are considered in addressing the broader historic context of Lahaina. This additional contextual information leads to a better-informed understanding of the NHL, the people associated with it, and the historic events that occurred there.

### **NATIVE HAWAIIAN PERSPECTIVES ON LAHAINA SIGNIFICANCE**

Part of the request by the ACHP was to include the perspectives of Native Hawaiian Organizations in addressing the national significance of Lahaina. NPS examined extant oral history and ethnohistory resources, and on July 30, 2024 (in person), and August 16, 2024 (virtual), conducted information-sharing sessions with Maui Native Hawaiian Organizations and members of the Native Hawaiian Community of Lahaina. As defined in 36 CFR § 800.16(s)(1), a Native Hawaiian Organization “means any organization which serves and represents the interests of Native Hawaiians; has as a primary and stated purpose the provision of services to Native Hawaiians; and has demonstrated expertise in aspects of historic preservation that are significant to Native Hawaiians.” Native Hawaiian “means any individual who is a descendant of the aboriginal people who, prior to 1778, occupied and exercised sovereignty in the area that now constitutes the State of Hawaii.”<sup>4</sup> The information sharing sessions included an overview by NPS of the Lahaina NHL District and the 213 report request, and then provided an opportunity for participants to ask questions and to share information. Consistent with 54 U.S.C. § 302706, NPS considered and values Native Hawaiian perspectives and knowledge in investigating historic properties associated with the NHL District.

Researchers have examined Native Hawaiian worldview as it pertains to the identification and assessment of Lahaina historic properties and cultural landscapes, recognizing that Native Hawaiian perspectives, ontology, and epistemology differ substantially from Western concepts

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<sup>4</sup> For the purposes of this report, this definition follows the legal definition under Section 106 of the National Historic Preservation Act and does not anticipate or otherwise address any other Federal or State agencies' definitions, or Indigenous definitions of “Native Hawaiian” or “Native Hawaiian Organization.”

October 1, 2024

(e.g., Ah Sam et al. 2005; Klieger 1998; Maly 2001; Maly and Maly 2007; Meyer 1998; Tau‘a and Kapahulehua 2005; Watson et al. 2016; Information sessions). Maly and Maly (2007:7) suggest that to Native Hawaiians the Lahaina cultural landscape is a living place with people inseparable from the natural environment (*pilina*) and was the product of the creative forces of Hawaiian deities with direct genealogical connections to living families. The authors identify the Indigenous “spiritual affiliation” with this environment as a guiding element of the history of Lahaina before contact, and contrast this with the time since 1820 when Western and other world views and ways of connecting with the environment were introduced.

The current NHL District boundary is based on Western notions of preserving the setting and feeling associated with Lahaina through maintaining viewsheds to important outlying geographic areas, including the West Maui Mountains and Lāna‘i across the ‘Au‘au Channel. These and other areas of Lahaina are also of great significance to Native Hawaiians, in particular as they represent important, named areas of the traditional Hawaiian land use system, *ahupua‘a* that extend from mountain summits and craters into the ocean (Kamakau 2011; Mueller-Dombois 2007). Notably, the *ahupua‘a* of Lahaina differ from the typical orientation in that many are discontinuous, reflecting familial connections across a variety of elevational and resource zones (Maly and Maly 2007: i, 8–9).

The abundance of food and natural resources from land and sea at Lahaina is one element that contributed to its development as a chiefly center. The NHL District boundary largely encompasses the coral reef, reportedly called Kapapalimuāpi‘ilani by Native Hawaiian informants, a significant source of fish, algae, and other seafood, and bracket critical streams that provided freshwater to this arid, leeward side of Maui. Kahoma Stream, fed by its primary tributary Kanahā Stream, exits at Pu‘unoa Point in the north, and Kaua‘ula Stream exits at Mākila Point in the south (Figure 5). Kahoma and Kanahā streams were essential freshwater sources for traditional agricultural field complexes in the *kula* lands (gentle sloping lands) that employed ‘*auwai* (ditches) to irrigate fields, in the cultivation habitat zone identified as *Wao Kanaka*. Blockage of the three streams during times of warfare greatly impacted the ability of the population to procure food.

Much of the eastern portion of the NHL is within *kahakai* (near-shore lands, called *kula kahakai* by Maly and Maly [2007:4]) that were associated with places of worship, residences, fishponds, and *kalo* (taro) ponds. The Lahaina *kahakai* was noted for its groves of trees, especially ‘*ulu* (breadfruit), *niu* (coconut), *mai‘a* (banana), *kou*, and *wauke* (paper mulberry). Within this *kula kahakai*, the commingling of *kai* (seawater) and *wai* (freshwater) in the *muliwai* (estuary) was identified as an area for purification, cleaning, healing, and ceremony.

Freshwater and brackish ponds, many of them named, are recorded in this area, including the large Loko o Mokuhinia within which the royal island of Moku‘ula was located. Loko o Puako remains visible as a depressed area to its north (see below). Loko o Nalehu were a series of lakes west and south of Loko o Mokuhinia. Loko o Kalolo and Loko o Hoolili were north of the armory property, and an unnamed lake was east of the courthouse block and north of the

October 1, 2024

Canal Basin (Klieger 1998; Figure 6). Rainwater, scarce on the leeward side of Maui, is also a sacred entity that can be observed in rain clouds that move across the area. Native Hawaiian informants emphasized the importance of water, including the streams and freshwater spring-fed ponds, during a July 2024 NHL site visit and during the information-sharing sessions.

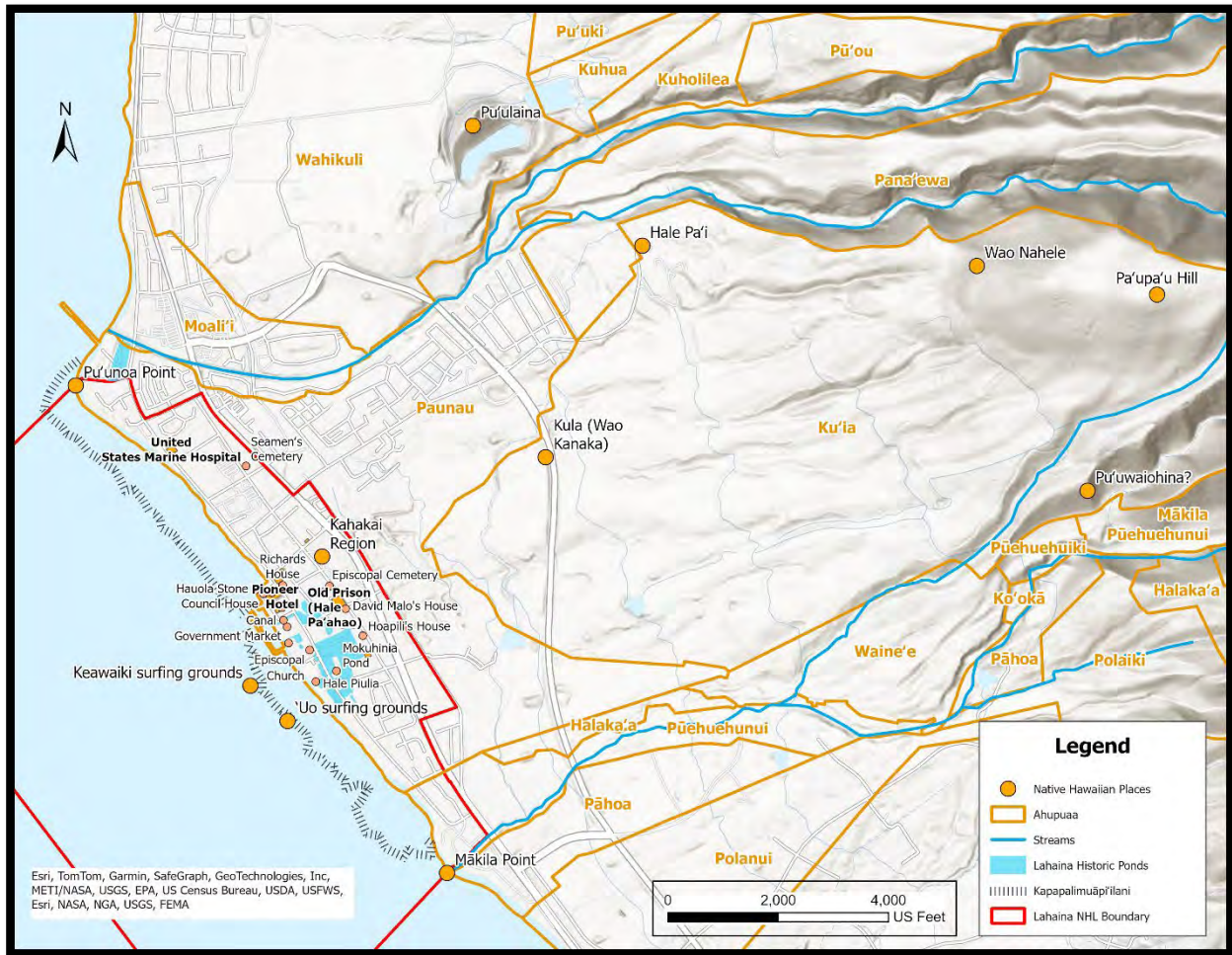


Figure 5. Native Hawaiian places associated with the Lahaina NHL District (NPS)

Views *mauka* (upland) to legendary places tied to Hawaiian gods and the connections of these places to the NHL are central in gaining a Native Hawaiian perspective on the national significance of Lahaina. The views inland from Lahaina were connected to significant spiritual and legendary places including Pu'ulaina cone, which was the offspring of two large summits of the West Maui Mountains and served as a dwelling place for Pele on her migration through the Hawaiian Islands (Figure 7, see also Thrum 1906:37–38). Likewise, the large ridge to the east associated with Kaua'ula Stream was known as Pu'uwaiohina (water hill of Hina, goddess of the earth), which would give a warning of pending storms in the form of noise created



October 1, 2024

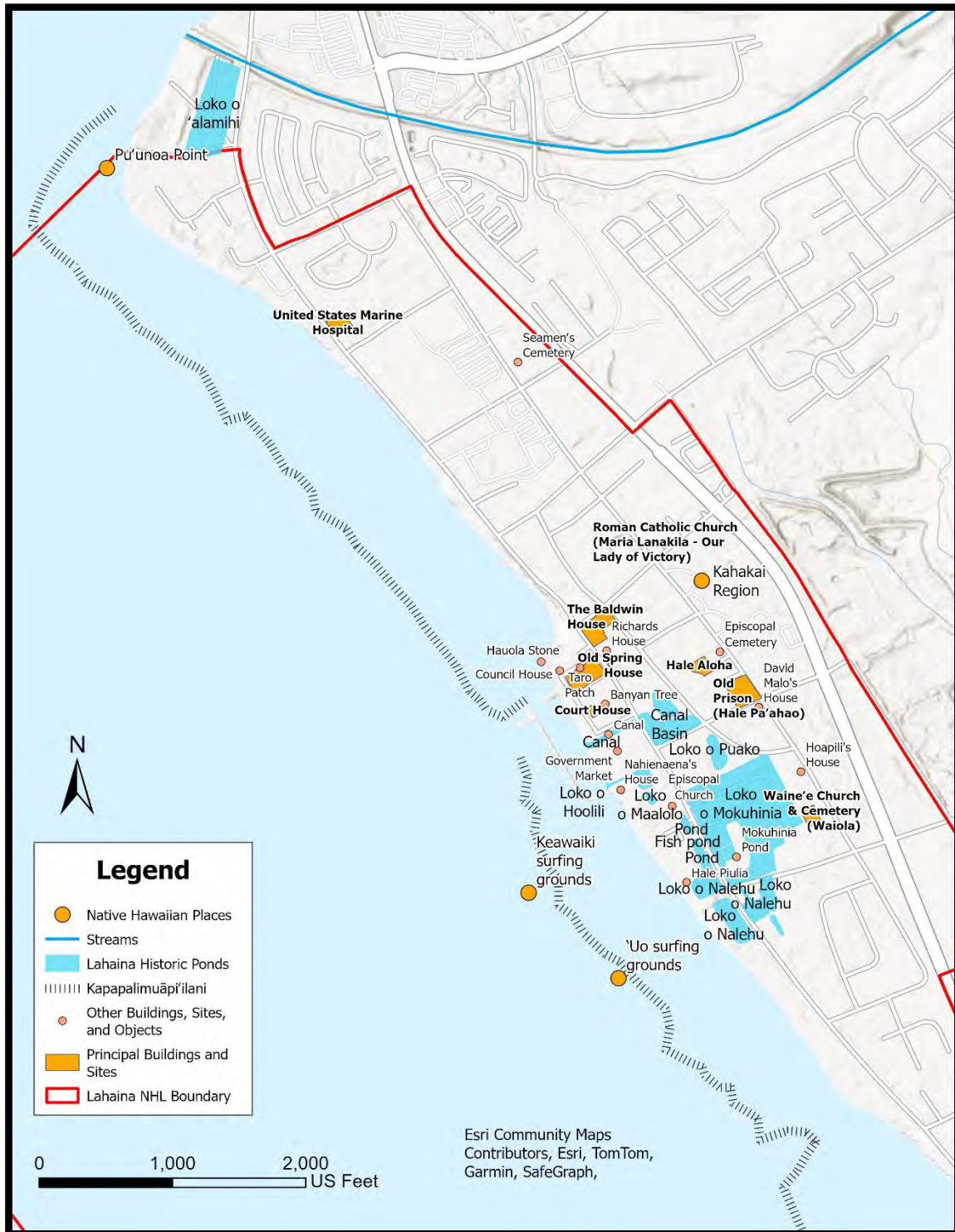


Figure 6. Native Hawaiian places, ponds, and other sites within the Lahaina NHL District (NPS)

October 1, 2024



*Figure 7. Pu‘ulaina cone from the site of Moku‘ula Island, looking north-northeast. NPS photograph taken August 1, 2024.*

through a hole in the rocks when the Kaua‘ula wind would blow (strong trade winds that break over the West Maui Mountains, often associated with destructive forces). Pa‘upa‘u, the hill where Hawaiian historian and intellectual David (Davida) Malo (1795–1853) is buried, has also been associated with the Kaua‘ula winds and the *pu‘u* (fortified hill) of eighteenth-century struggles between Hawaiian chiefs Kalani‘ōpu‘u and Kahekili (Kamakau 1992: 89). These upland areas are at the ecotone between Wao Kanaka (dryland and irrigated agricultural fields) and Wao Nahele (forested uplands).

Views *makai* (seaward) also are important. An inventory of viewsheds that might be affected by offshore energy projects used Hawaiian traditions to explore how the Native Hawaiian worldview relates to National Register significance (Watson et al. 2016). This work examined the dualistic relationship in the Native Hawaiian perspective of *‘āina* (land) and *kai* (sea) and the notion that the natural world is embedded in Hawaiian cosmogonic genealogy with obligations by people to care for and respect the natural world. In this regard, the relationship of certain places to land and sea is critical, with *nā ‘ikena kai* (seaward-facing viewsheds) of particular importance. At least two *nā ‘ikena kai* associated with Lahaina were reported: the



October 1, 2024

views of the ocean from King Kamehameha III's Royal Residential Complex (Moku'ula) (SIHP #50-50-03-2967, NRIS 97000408, National Register-listed May 9, 1997) and the views to the 'Au'au Channel between the islands (Kaho'olawe/Lāna'i).

Statement by Native Hawaiians support these landscape-level connections (Ah Sam et al. 2005; Tau'a and Kapahulehua 2005). Interviews conducted as part of cultural impact assessments and information shared with NPS confirm that the connection between the *kai*, Kapapalimuāpi'ilani, *kahakai*, *kula*, and *Mauna* (mountains) are culturally important. This connectivity *mauka* to *makai* and the relationships these encompass are embodied in the Hawaiian *ahupua'a* land management system, a critical Native Hawaiian concept that contrasts with Western spatial designations. One informant to a cultural impact assessment suggested that "culturally, everything in the *ahupua'a* is connected, from the mountain to the sea" (Ah Sam et al. 2005:13). Informants linked Native Hawaiian places and features within the NHL as a single landscape – Loko o Mokuhinia, the Hauola stone, Kamehameha I's Brick Palace, the residence of Kamehameha III on Moku'ula Island, the stone house of Hoapili (Waine'e Church), and fishponds with Kapapalimuāpi'ilani, the coral reef where Pi'ilani gathered *limu* (edible algae) and related fishing grounds associated with Kananaka (half shark/half woman). 'Aumākua manō (ancestral shark diety), and 'aumākua mo'o (shapeshifters like Kihawahine, see below) were denizens of this royal complex of places. Likewise, multiple informants identified the Keawaiki surfing grounds (outside of the Lahaina Harbor entrance) and 'Uo surfing grounds south of Keawaiki. Some remarked that the Hawaiian deity Kanaloa could be seen at times surfing there.

Several places referenced in the 1974 nomination have benefited from additional contextualization. Even before 1974, the Hauola Stone was known as a place of birthing and healing that continues to be used by Native Hawaiian people (Green and Beckwith 1924). Likewise, the Waine'e church and cemetery is associated with Hawaiian royalty, and Luakini street is associated with the burial procession of Princess Nāhi'ena'ena in 1837. Native Hawaiians reported that a *ko'a* (shrine) and *heiau* (temple) were located near 505 Front Street (across from Loko o Mokuhinia). Kamehameha's taro pond field is emphasized as an important place tied to the production of *kalo* and where Kamehameha I worked in the field. Information shared by Native Hawaiian sources also suggest that the upland (*mauka*) areas contain important Hawaiian resources and recommend Pa'upa'u (sometimes known as Mt. Ball), which is identified as the fortified hill of Kahili and location of David Malo's grave. This hill is just above the *Wao Kanaka* within the *Wao Akua*. Likewise, also visible from Lahaina is the Lahainaluna school where Hale Pa'i (House of Printing) is located, which were also noted as significant by Native Hawaiians during the information sharing sessions.

### **Historic Context and Significance Evaluation**

The 1974 NHL nomination for Lahaina attributes the district's significance to its role as a Hawaiian royal residence and capital, a whaling port, and a center for missionary activity in the nineteenth century. While acknowledging Lahaina's association with Hawaiian royalty, the

October 1, 2024

nomination prioritizes the latter two themes. The American whalers, businessmen, and missionaries who headquartered in Lahaina are credited with contributing to “the Americanization of Hawaii and its subsequent annexation by the United States” (Apple 1974: 9). As noted in Section 1, Native Hawaiians, including members of the royal family who ruled from Lahaina, are attributed limited agency and are largely characterized as acquiescent to Western influence.

Historical scholarship published since 1974 provides for a more complete understanding of Lahaina’s historic significance that centers Hawaiian perspectives and experiences. This work incorporates *mo‘okūauhau* (genealogy) and *mo‘olelo* (stories) to inform an understanding of significant events and cultural practices in Hawai‘i prior to contact with the West. Drawing from Hawaiian language sources, recent scholarship also challenges an earlier historiography based primarily on English-language sources that marginalized Native Hawaiians and presented them as passive in the face of Western contact (Silva 2004b; Smith 2019; Williams 2011). In elevating Hawaiian voices, scholars have brought attention to the harmful effects of Western influence during the nineteenth century while also recovering a history of Hawaiian resistance, innovation, and persistence against overwhelming odds (Beamer 2014; Corley 2022; Kame‘eleihiwa 1992; Osorio 2002; Silva 2004a; Trask 1993). This literature provides a basis for reframing Lahaina’s national significance as an important Native Hawaiian spiritual, cultural, and political center from the time of the Maui kingdom, through the period of the Hawaiian monarchy, up to the present day.

Current scholarship also supports attributing a higher level of significance to resources associated with Hawaiian history and culture in Lahaina. Notable among these is Moku‘ula, the sacred island that served as a royal residence and site of governance in Lahaina. Anthropologist P. Christiaan Klieger describes Moku‘ula as “an *axis mundi* of the Hawaiian world,” a place where “political and religious ritual operated in concert” (Klieger 1998:ix). Its significance derives from its connection to the genealogy of the Maui royal family whose lineage is traced to the gods. Of particular importance was the *ali‘i nui* (paramount chief) Pi‘ilani who unified Maui and ruled from Lahaina in the late sixteenth century. Loko o Mokuhinia, the fishpond that surrounded Moku‘ula, takes its name from the princess Kihawahine Mokuhinia Kalama‘ula Kalā‘aiheana, daughter of Pi‘ilani and Queen Lā‘ieloheloheikawai. Kihawahine is said to have been born on the Hauola stone at Mākila beach (just south of Lahaina). Upon her death, she was transformed into a *mo‘o* (lizard goddess) and thereafter inhabited the pond (Klieger 1998:9). Kihawahine reportedly had the ability to move between various fishponds and even to enter the bodies of living people. She is among the most revered deities in Hawai‘i (Wyban 1992:130).

The descendants of Pi‘ilani and Lā‘ieloheloheikawai included several other *ali‘i nui* of Maui. Among them was Keōpūolani, daughter of Kīwala‘ō and his half-sister Keku‘iapoiwa Liliha. Keōpūolani—who held the *mana* (spiritual power or authority) of the chiefly line of Maui and whose *aumakua* (ancestral spirit) was the *mo‘o* Kihawahine—was wedded to Kamehameha I in 1795 following his conquest of Maui. This union ensured that Kamehameha’s rule over the



October 1, 2024

islands could be consolidated and recognized as legitimate. From 1802 to 1803, Kamehameha I located his court at Lahaina, at which time he cultivated a taro patch and occupied a brick house, one of the earliest Western buildings in the islands. Liholiho and Kauikeaouli, the sons of Kamehameha and Keōpūolani, carried the *mana* of their mother's bloodline and would inherit their father's title of *Mo'i* (supreme ruler or king) of all Hawai'i (Klieger 1998:16–22).

The unification of the Hawaiian Islands and formation of the Kingdom of Hawai'i occurred concurrently with the arrival of westerners. The events were deeply interconnected. Kamehameha I brought Western advisors into his court and made use of Western ships and weapons in his wars of conquest. Upon the death of Kamehameha I in 1819, Keōpūolani and Ka'ahumanu, the king's favored wife, broke the '*ai kapu* (system of sacred restrictions regarding contact between men and women) by sharing a meal with Liholiho (Kamehameha II). Known as '*ai noa* (free eating), this event, which occurred prior to the arrival of the first American missionaries in 1820, introduced a new source of sacred power and opened the door for Hawaiians' acceptance of Christianity (Kame'eleihiwa 1992:79–82; Mookini 1998:16–18).

In the years that followed, Lahaina became a focal point of cross-cultural interaction, conflict, and transition even as it retained its status as a spiritual and political center for Hawaiians. Kauikeaouli and his younger sister Nūhi'ena'ena relocated to Lahaina from Kailua in 1820. Their mother Keōpūolani joined them in 1823, inviting Reverends Charles Stewart and William Richardson to accompany her (Mookini 1998:2). On her deathbed, Keōpūolani became the first member of the royal family to receive Protestant baptism. The Queen's funeral was also the first of its kind, consisting of a blending of traditional Hawaiian and Christian rites. Shortly before this, the royal family authorized the establishment of a mission on land bordering Loku o Mokuhinia within sight of Moku'ula. Maui Governor Ulamāheihēi Hoapili (second husband of Keōpūolani) approved construction of a stone church on the site in 1828. The building was completed in 1832 and dedicated as Waine'e Church. Keōpūolani, along with several other prominent members of the royal family, were later buried at the cemetery adjacent to the churchyard.<sup>5</sup>

Lahaina is also significant for its association with the reign of Kauikeaouli (Kamehameha III), which began in 1825 with the death of his older brother Liholiho. Kauikeaouli lived and governed from Lahaina until 1845 when the capital moved to Honolulu. This was a perilous and uncertain time for the monarchy during which Kauikeaouli and other *ali'i* struggled to uphold traditional values and ways of life while adapting to the introduction of Western ideas and practices. Moku'ula served as a retreat for Kauikeaouli, a sanctuary from the pressures of the court and a "place set apart" where much of the traditional *kapu* (sacred restrictions) could be maintained (Klieger 1998:1–3).

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<sup>5</sup> Keōpūolani was entombed originally at Pa Halekamani, the residence she shared with her daughter. The Queen's body was removed to the tomb on Moku'ula around 1836, then relocated to Waine'e Church cemetery sometime in the 1880s.

October 1, 2024

Recent scholarship demonstrates that even as he sought solace at Moku‘ula, Kauikeaouli grasped the importance of incorporating Western systems of education and law in order to protect the Hawaiian people, gain recognition within the international community of nations, and ensure the Kingdom’s independence (Beamer 2014; Corley 2022). In 1831, he approved a land grant to the American Protestant Mission for the establishment of Lahainaluna Seminary. Many *ali‘i* welcomed this as a way to promote literacy and ensure development of a group of Hawaiians educated in Western disciplines who would reduce the need for foreign advisors to the government (Corley 2022:62). From the printing press at Hale Pa‘i on the Lahainaluna campus also came the first Hawaiian language newspaper in 1834. Students at Lahainaluna wrote and printed *Ka Mo‘olelo Hawai‘i*, the first history of Hawai‘i written in the Hawaiian language from a Hawaiian perspective (Malo 1898:18). Their contributions also included the first *ahupua‘a* map of Hawai‘i. Additionally, at the direction of Kauikeaouli, graduates of Lahainaluna, including Boaz Māhune, David Malo, John and David ‘Ī‘ī, and Timoteo Keaweīwi, drafted the Kingdom’s first written civil code in 1839. The code integrated Western and Hawaiian concepts of property rights, inheritance, trade, resource management, and class relationships, and became the basis for Hawai‘i’s first constitution, promulgated in Lahaina in 1840 (Beamer 2014; Corley 2022:66–67).

Lahaina’s role as a political center in the nineteenth century also influenced the development of economic activities, including whaling. The monarchy authorized laws regulating the whale fishery, maintaining public order and safety, and governing the drafting of contracts with Native Hawaiian crew members (Corley 2022:114; Lebo 2010). Historic buildings associated with whaling and missionary activities in Lahaina were also all constructed under the authority of the monarchy, and thus reflect the interconnectedness of Hawaiian and American histories through the nineteenth century. An example is the Marine Hospital, located on a parcel of land which Kauikeaouli granted to a Mexican cattle rancher Joaquin Armas for his service to the king (Pyle 1973). According to the Lahaina Restoration Foundation, Kauikeaouli may have used the building as a retreat before it was converted to a hospital for sick sailors. Constructed in 1917, the U.S. Coast Guard Light Station is the most recent of several similar structures built on the Lahaina waterfront, the first of which was a beacon (or possibly “observation tower”) constructed in 1840 at the direction of Kauikeaouli.

Lahaina’s importance as a royal residence and center of governance declined after the movement of the capital to Honolulu in 1845, and even more so after the death of Kauikeaouli in 1854 (Klieger 1998:ch5). The royal compound on Moku‘ula, including the mausoleum Kauikeaouli built on the site, as well as other buildings associated with the royal family, fell into disrepair. Maui government functions continued at the unfinished Hale Piula, originally intended as a palace for Kauikeaouli, until 1858 when Ka‘aula winds destroyed the building. Coral blocks and other materials from Hale Piula were used to build the Lahaina Courthouse and Customs House on Front Street.

Hawaiian residents of Lahaina remained engaged with political and economic changes affecting their community through the late nineteenth century. Many resisted developments that worked

October 1, 2024

against their interests. As documented by Maly and Maly, this included court testimonials and publications in Hawaiian language newspapers advocating for Native tenant rights and attributing food and water shortages to sugar plantation operations beginning in the 1860s (Maly and Maly 2007: 930–934, 935–942). In 1893, Waine‘e Church became a significant site of protest when nearly the entire congregation organized to evict the church pastor due to his support for American annexation (Williams 2013:ch3). This event points to the persistence of a Hawaiian national consciousness in Lahaina on the eve of annexation, challenging the “Americanization” narrative put forth in the existing NHL documentation.

Many Native Hawaiian families remained in Lahaina through the twentieth century. Resources associated with these families include the home of William K. Kaluakini, a graduate of Lahainaluna who served as a government official in the early twentieth century; and the home of Mary P. Bright, a cultural practitioner and lineal descendant of the *ali‘i* of Lahaina.<sup>6</sup> At least one burial site associated with a significant individual from the monarchy period also remains on family land just outside the present boundary of the NHL and is stewarded by descendants. The continuity in the genealogy of Lahaina contributes to its significance as a Native Hawaiian place to the present day.

Lastly, the 1974 nomination did not attribute national significance to the theme of sugar-cane plantation agriculture and canneries in the nineteenth and twentieth centuries. Buildings associated with the Pioneer Mill, founded in 1861, reflect the transition within Hawai‘i to a capitalist economy. These and other buildings, like the Wo Hing Society Building, are also associated with the many immigrants who came to the Hawaiian Islands in search of wage work and other opportunities in the early twentieth century, including Chinese, European, Filipino, Japanese, Okinawan, Portuguese, and others. The nomination included town blocks within the boundary as part of the setting of the Lahaina NHL that likely included resources associated with this context; however, no specific buildings within these blocks were identified in the nomination as associated with the areas of significance and many of the buildings and structures within these blocks fall outside the period of significance. Additional research is needed to fully evaluate the significance of these resources.

## Findings

In conclusion, there is a need to update the NHL documentation for Lahaina to better reflect current interpretations grounded in Native Hawaiian language sources and epistemologies. The additional contexts, themes, and significant individuals given emphasis in more recent literature and in statements by Native Hawaiian community members elevate the significance of Native

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<sup>6</sup> Built in 1927, the William K. Kaluakini House at 450 Front Street has been listed in the Hawai‘i Register. Kuakini (1887–1932) was a member of the Royal Order of Kamehameha I and served as deputy sheriff.; Built in 1963, the Mary P. Bright House at 429 Front Street was listed in the Hawai‘i Register of Historic Places in November 2019. Born Mary Ka‘aikauna P. Kealaka‘a, Bright (1899–1987) was known as “Aunty Poni” and was a keeper of traditional knowledge.

October 1, 2024

Hawaiian resources in the NHL District. They also support recognition of additional cultural and archaeological sites identified since 1974 as contributing resources.

## **DOCUMENTED ARCHAEOLOGICAL SITES**

Many resources important to Native Hawaiians, including resources associated with the Maui Kingdom and Hawaiian monarchy, are present as archaeological sites within or near the NHL boundary (e.g., Burgett and Spear 1994; Donham 1993; Fredericksen 2002; Fredericksen and Fredericksen 2001; Fuentes et al. 2018; Klieger 1998; Lee-Grieg et al. 2017; Mooney and Cleghorn 2007; Pietruszewsky and Douglas 1990; Rotunno-Hazuka and Pantaleo 2007; Six 2012; Haun and Rechtman 1999). Common features include post holes, pits, middens, rock alignments, walls, and burials. Some important Western-inspired buildings are also present as ruins. Outbuildings and outdoor features associated with buildings remain as archaeological resources.

While a few archaeologists identified resources in Lahaina before 1974, most of the archaeological work has taken place since the NHL District nomination. Some archaeological sites date to the late nineteenth and twentieth century and are outside of the areas and date of significance for the NHL District (e.g., Calis 2002; Perzinski and Dega 2011). Since the 1990s, archaeologists have reexamined research based on Western perspectives and increasingly are collaborating with Native Hawaiians to address the significance of Native Hawaiian sites and the connections to living communities (Kawelu 2014; Lee-Grieg et al. 2017; Six 2012).

Early researchers identified a number of *heiau*<sup>7</sup> in the Lahaina region of which four were close to or within the NHL District: (1) Apahua located in Waine‘e, which in 1909 only contained fragments of the foundation, (2) Halekumukalani within the *ahupua‘a* of Puehuehu, (3) Halulukoakoa, a coral *heiau*, was within the *ahupua‘a* of Wahikuli north of the NHL, and (4) Wailehua, in the *ahupua‘a* of Māhila was within the NHL near its southern boundary and was noted as destroyed in 1929 (Stokes 1916 and Walker 1933 in Maly and Maly [2007: 70–73]; Thrum 1908a:38, 1908b). None of these *heiau* have been relocated or recorded in the late twentieth or twenty-first centuries. It is reported that before 1823, a *heiau* was present at the location of the Lahaina Wharf but was removed and used to create the tomb of Keōpūolani at Pa Halekamani, at the present Kamehameha School site. Her remains were moved to the mausoleum on Moku‘ula around 1836, then reinterred at Waine‘e Church cemetery by the 1880s (Community Planning Inc. 1961; Fredericksen 2004; Klieger 1998).

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<sup>7</sup> *Heiau* are places where ceremony and protocol were conducted, including temples that are often in the form of walled stone enclosures or open platform structures that continue to have a high level of significance to contemporary Native Hawaiian communities (e.g., Flexner and McCoy 2016; Graves and Sweeney 1993; Kamakau 2011; Malo 1898; Thrum 1906).

October 1, 2024

The first systematic archaeology in Lahaina was a project that exposed portions of the intact foundations of Kamehameha I's Brick Palace (Site 50-50-03-2951), which was built in 1802 for Ka'ahumanu, the favorite wife of Kamehameha I. It is reportedly one of the first Western type buildings constructed in the Hawaiian Islands, dating only a few years after John Young's homestead, built 1798–99 (Fredericksen and Fredericksen 1965; see Durst [2001]). While excavated after the NHL designation, it was reported in the 1974 nomination, including a photograph showing skylights on top of brick features exposed in 1965.

Also recorded before 1974, Hommon (1973) drew and described the Hauola stone as an archaeological site (Site 50-50-03-1202). As noted above, this historic object is tied to Native Hawaiian practices and beliefs about birth and healing.

Excluding burial sites, and prior to the archaeological survey and monitoring associated with the recent FEMA undertakings, there have been 26 archaeological sites recorded within the NHL District boundary. The archaeological resources represent a range of types, including Native Hawaiian sacred sites, aquacultural and agricultural sites, and traditional cultural habitation surfaces that precede or are within the period of significance of the NHL and likely represent contributing sites associated with the monarchy or royal center (Appendix A). Later historic features include historical refuse deposits and pits, sea wall and boundary wall segments, and curbstones likely post-dating the NHL period of significance. In addition, numerous burial sites associated with Native Hawaiians are present that are consistent with the royal center in the nineteenth century and its context preceding the nineteenth century. Later colonial immigrant burials also have been documented that are of historic importance but reflect periods outside of the NHL District period of significance and areas outside the areas of significance of the NHL District.

Archaeologists have recorded King Kamehameha III's Royal Residential Complex (Moku'ula, Loko o Mokuhinia, and the Hale Piula sites; SIHP site #50-50-03-2967) as an archaeological site individually listed in the National Register of Historic Places under multiple National Register criteria (A, B, D) with a period of significance of at least A.D. 1600s to the 1860s. Archaeologists have documented remains of wetlands, the perimeter wall of Moku'ula Island, enclosing and retaining walls, causeways, activity surfaces and middens, and burials (Klieger 1998; Lee-Grieg et al. 2017; Major and Klieger 1995; Six 2012). The archaeological remains tie directly to the Native Hawaiian royal sites that flank Front Street between Malu ulu o mele Park on the south and the Hauola Stone on the north. Numerous burials have been noted within these properties, some of which are likely associated with pre-unification and monarchy period Native Hawaiian royalty.

### **Native Hawaiian Archaeological and Cultural Sites Outside of the NHL Boundary**

An important fishpond (Loko o 'alamihi) has been recorded as an archaeological site just north of the NHL boundary just south of Kahoma Stream (Site 50-50-03-3799). This freshwater fishpond has been identified as eligible to the NRHP under criteria A, B, and D. It is reputedly the site of the battle between Kamehameha nui and Kauhi'aimokuakama (cf., Hibbard 1994;

October 1, 2024

Maly and Maly 2007:71, see also Kamakau [1992: 72–74]). It was maintained by Kamehameha III and contains information important in exploring the use of freshwater fishponds between the late eighteenth to mid-twentieth century (Hibbard 1994). Historic-period graves have been recorded in its northern area and pre-unification graves in the south. The adjacent Papiha (*Māla*) cemetery contains numerous Native Hawaiian graves in a sandy ridge adjacent to the fishpond and there is a Japanese immigrant cemetery south of the Māla Wharf (e.g., Dixon 1998). In addition, the Māla Wharf is a historic property associated with the twentieth-century maritime shipping. Loko o ‘alamihi and its associated Native Hawaiian historic and cultural sites and burial appear to date to the period of significance of the NHL (and earlier) and are associated with the NHL significance of the royal center. The later twentieth-century sites, structures, and Japanese cemetery do not date to the period of significance and are not associated with the NHL areas of significance.

Other platform burial sites that date to the period of significance and before are present on the *kula* areas east of the NHL District, including areas south of Kahoma Stream, including a platform burial mound associated with a known significant individual from the nineteenth century in Kelaweā which was visited by the NPS team and SHPD representatives on July 30, 2024. It contained burials dating back to at least 1843 associated with lined stacked stones. This site has been recorded at SHPD, and according to SHPD records, there is another platform burial site located further east in the same community. This region is within the *‘awai kanaka* zone and there are some agricultural sites recorded that reflect these functions nearby. Also, along Kahoma Stream is an extensive area of petroglyphs called the Kahoma complex (Site #50-50-03-01203) recorded as 38 petroglyphs scattered along a 112 m cliff face with a rock shelter, terraces, and enclosure. In his survey of 1929–1930, Bishop Museum archaeologist William Walker recorded a boulder on the Lahainaluna school grounds with pecked figures on horseback. He also noted that the petroglyphs were obscured by modern names etched on the boulder (Maly and Maly 2007:73). No subsequent record of this boulder was located for this report. The Lahainaluna Cemetery on the campus dates to the period of significance of the NHL and portions of the Lahainaluna Ditch (SIHP #50-50-03-06498), which was constructed in the 1840s has also been recorded.

## SUMMARY

This survey of historic properties within and near the Lahaina NHL District demonstrates that there are numerous historic resources, including buildings, structures, objects, and sites, that are within the period of significance and associated with one or more of the themes of NHL significance. Many of these historic resources fall within the boundary of the NHL District and, based on current NHL Program guidelines, should be considered contributing properties to the NHL District. These include numerous Native Hawaiian historic, archaeological, and sacred sites that are tied directly to the Kingdom of Maui and later the Hawaiian monarchy. Based on information sharing sessions conducted for this report, combined with other ethnographic and ethnohistoric data, a Native Hawaiian cultural landscape remains present in the form of intact archaeological deposits, sites of cultural significance, natural features, and aspects of the built

October 1, 2024

environment associated with the monarchy period. Even with alterations resulting from development and land use changes, the landscape continues to evoke a Native Hawaiian sense of continuum and place.

Missing from the current NHL documentation is a more nuanced context of Native Hawaiian *pilina* and its connection to the abundance of foods, the role of the natural, cultural, and biocultural<sup>8</sup> environment in terms of settlement, and the sacred landscape that is connected to important sites in the history of Maui and of the Hawaiian Kingdom.

There are other Native Hawaiian buildings, objects, and sites that date to the NHL period of significance, are associated with the royal center and monarchy, but are outside of the current boundary of the NHL District. Additional research on these resources may justify adjusting the boundary of the NHL District to include these resources.

In addition, there are resources within and outside of the NHL boundary that post-date the NHL period but are important in the later twentieth-century context of sugarcane plantation agriculture and canneries. These include resources associated with the many immigrants who came to the Hawaiian Islands in search of wage work and other opportunities in the early twentieth century, including Chinese, European, Filipino, Japanese, Okinawan, Portuguese, and others. If an NHL update is pursued, it will be important to consider their relative significance and whether further refinement of the period of significance may be warranted. Contextually, their preservation is compatible with the setting and feeling of the NHL District.

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<sup>8</sup> Biocultural environment is “any physical, biological, and human elements that strengthen a people’s evolving relationship with a defined place, and maintain their unique set of customs, beliefs, language, traditional knowledge, objects and built environment. It is also the tangible and intangible cultural heritage relation to human interaction with the natural environment, and the organisms, ecosystems, and geophysical components within that environment which are essential to such cultural heritage.” Pacific Islands Climate Change Committee (PICCC), 2016.

October 1, 2024

### **SECTION 3: THE LAHAINA WILDFIRE AND SUBSEQUENT EMERGENCY ACTIONS**

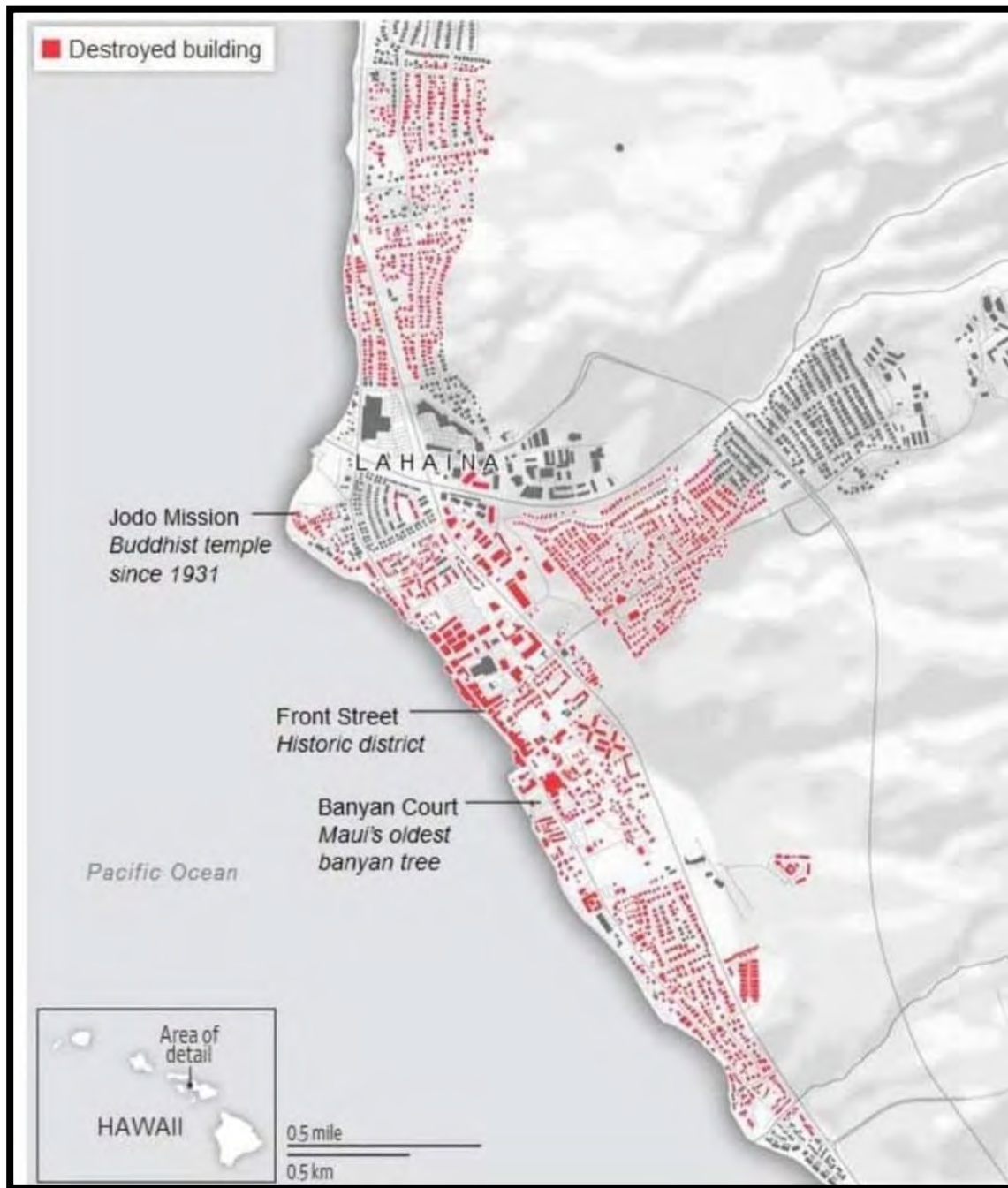
This report differs from most other Section 213 reports in that the undertaking is an emergency response, the actions are on-going, and many parts of the cleanup program occurred before the ACHP sent the request to the Director. The federal emergency response is guided by a 2023 programmatic agreement among FEMA, the Hawai‘i State Historic Preservation Officer, the Office of Hawaiian Affairs, and the Hawai‘i Department of Defense, regarding expedited review for emergency undertakings. The undertakings have developed in response to conditions on the ground, particularly those associated with NHL District principal buildings and archaeological finds. This section describes the Lahaina wildfire and subsequent emergency actions associated with the NHL District. It is based on materials provided by SHPD, FEMA, and other agencies, but is not comprehensive as the undertakings are still evolving and many undertakings were initiated during the time in which this report was prepared.

The August 2023 Hawai‘i Wildfires (FEMA-4724-DR-HI ) were among the worst natural disasters ever recorded in Hawai‘i. Between August 8–11, 2023, the most destructive of these, the Lahaina fire, burnt 2,170 acres, damaging or destroying 2,207 buildings and structures, displacing 4,500 people, and resulting in over 100 fatalities (PDC Global 2023, Figure 8). On August 10, 2023, President Biden declared the wildfires a major disaster and within days, FEMA notified SHPD of the expectation that there would be undertakings associated with the emergency. Agencies and non-profits involved in the response include the Department of the Interior (DOI), EPA, USACE, SHPD, County of Maui, Hawaii Museums Association, Maui Arts and Cultural Center, County of Maui Office of Recovery, NPS, and the Smithsonian Institution Cultural Rescue Initiative.

Numerous combined federal, state, and local emergency actions associated with life-health-safety began immediately after the wildfires. Phase 1 of FEMA’s emergency response for property was removal of hazardous waste led by EPA. Starting August 29, 2023, EPA removed hazardous materials, provided technical assistance for water infrastructure, and are continuing to assist with long-term sustainability (<https://www.epa.gov/maui-wildfires>). EPA also partnered with the Native Hawaiian organization Nā ‘Aikāne o Maui to hire local cultural monitors and archaeologists familiar with the community and conducted archaeological monitoring, coordinated by USACE (also continued in Phase 2 by FEMA and USACE). EPA crews removed more than 200 tons of hazardous materials from over 1,400 properties. Soil stabilizer was applied to prevent ash and debris from migrating off the properties. Lithium batteries from electric and hybrid vehicles and power walls were recycled. EPA also provided guidance and technical assistance to the County of Maui regarding stormwater, wastewater, and drinking water. An EPA sustainability advisor continues to help with long-term recovery assistance.



October 1, 2024



*Figure 8. Map showing destroyed buildings in Lahaina from the Maui Wildfires and select historic properties (FEMA 2023)*

October 1, 2024

Phase 2 is a “Consolidated Debris Removal Program,” that includes private residences and commercial and public buildings and is still ongoing. By September 15, 2023, FEMA identified ten activities eligible for assistance as part of this program:

1. Removal and disposal of surface ash, including up to six inches of incidental soil removal;
2. [Removal and disposal of] burned debris, including burned or partially burned furniture, personal belongings, household appliances (refrigerators, stoves, washers, dryers, etc.) and patio furniture;
3. [Removal and disposal of] hazardous materials and pollutants;
4. [Removal and disposal of] hazardous trees and unsupported walls that are hazardous to debris removal crews;
5. [Removal and disposal of] vehicles, marine vessels, and marine debris;
6. [Removal and disposal of] structural footings, foundations, chimneys, and basements;
7. [Removal and disposal of] hazardous trees that pose a risk of imminent threat of falling on the public right-of-way (ROW), or other public improved property;
8. Soil sampling after ash is removed from the ash footprint and excavation of contaminated soil as needed, commensurate with soils sample results;
9. [Removal and disposal of] commercial structures, to include ash, burned debris, foundations, and basements; and
10. Demolition of “clearly destroyed” private residential and commercial structures.

In general, the crews have not removed burned or partially burned stone that comprised walls and features, sidewalks/concrete walkways on private property, landscaping features, or statues. Likewise, debris removal from vacant lots, unused areas, unimproved property, or agricultural lands used for crops or livestock were not included, nor were cutting, plugging, and marking of subsurface sewer laterals or water lines serving fire-damaged properties, which were addressed by the County of Maui.

The USACE was tasked with removal of debris and installing bracing prior to debris removal for select historic buildings to protect cleanup crews and remaining historic fabric. FEMA coordinated surveys of these buildings by the American Institute of Architects (AIA) and requested the USACE Technical Center of Expertise for the Preservation of Historic Buildings and Structures (TCX) to evaluate whether these select buildings are feasible for rehabilitation and to develop bracing plans.

## **SUMMARY OF SECTION 106 CONSULTATION**

Throughout the emergency, the Governor of Hawai‘i has issued several proclamations to suspend application of the Hawai‘i historic preservation statute, HRS Chapter 6E, for actions associated with emergency demolition, repairs, construction, or other responses to the emergency. Under the Governor’s seventh proclamation relating to wildfires, signed September 8, 2023, work conducted under the limited suspension of Chapter 6E would still be subject to cultural, historic, and archaeological monitoring with the intent to protect and preserve

October 1, 2024

significant historic resources (Office of the Governor 2023). The federal participation of FEMA and other agencies requires compliance with Section 106 of the National Historic Preservation Act, guided by the 2023 programmatic agreement.

FEMA initiated consultation with SHPD on August 13, 2023, reporting their expectation of undertakings associated with the emergency. Since then, plans by the EPA and FEMA have addressed archaeological treatment and cultural resource sensitivity associated with cleanup actions. Planning has included consultation with Native Hawaiian Organizations, and project work includes facilitation of cultural protocols before and after work, consultation with traditional practitioners and cultural resource experts on operation details to avoid risk of adversely affecting cultural resources, project staff cultural awareness training, and employment of Native Hawaiian cultural resource observers. An Archaeological Treatment Plan (ATP) outlines the process to avoid, minimize, or mitigate potential adverse effects of the anticipated cleanup undertakings on most properties.

FEMA initiated (or will initiate) individual Section 106 consultation for the nine “key buildings” in the Lahaina NHL District as well as the King Kamehameha III Royal Residential Complex site. The ATP detailed conditions for archaeological survey, monitoring, and processes for collection stewardship, and included provisions for 90-day interim survey and monitoring reports. The ATP was finalized October 2, 2023, and the same day FEMA provided the consulting parties with an adverse effects determination for the Lahaina NHL District and other National Register-listed and eligible properties. In this, they identified adverse effects to the NHL District overall, but had not yet addressed adverse effects to individual contributing buildings and sites. They specified avoidance and mitigation measures, including the ATP and archaeological monitoring, oral history and documentation, and georeferencing of historic maps.

In Spring 2024, consultation occurred on separate undertakings associated with the Lahaina bus stop shelter and removal of piles and anchors within the small boat harbor. Additional consultation on undertakings with the potential to affect NHL-contributing buildings and sites occurring after June 1, 2024, are addressed in Section 4.

Results of the AIA surveys and draft TCX reports on the feasibility of bracing and rehabilitation were distributed to consulting parties on April 11, 2024. ninety-day summary reports on cultural resources efforts were also provided to consulting parties on February 15, 2024, and June 23, 2024 (Lee-Greig 2024a, 2024b). These reports included descriptions of cultural sensitivity trainings; notes on cultural observers and opening and closing protocols; and archaeological monitoring reports. Over the two summary reports, 741 new archaeological sites were recorded, with most dating to the “historic era” (indeterminate nineteenth or twentieth century) and 14 dating from pre-unification up to twentieth century. Isolated finds were also recorded. Previously recorded burial sites were flagged, and potential burial sites based on resident testimony were identified. As none of these sites were documented or available during the preparation of this report, they are not discussed in Section 2.

October 1, 2024

## SECTION 4: ASSESSMENT OF EFFECTS

### SUMMARY FINDING OF EFFECT

The Lahaina wildfire catastrophically burnt much of the above-ground resources in the town, having significant impacts on the built environment within and adjacent to the Lahaina NHL District. However, many archaeological sites, cemeteries, and other below-ground resources were not significantly impacted by the wildfire. Some stone walls of historic buildings were damaged but did not collapse and remain standing (Figure 9). While much extant vegetation was killed, many trees and other vegetation compatible with the Lahaina NHL District survived the fires. The ocean portion of the NHL District essentially was not impacted except perhaps in the very near shore where pilings and vessels were burned or debris from the fires fell.



*Figure 9. South façade of the Baldwin House showing fire damage and shoring. NPS Photo taken July 29, 2024.*

The current and ongoing cleanup activities have affected and will continue to affect the Lahaina NHL District. The following cleanup activities have had or will have the most detrimental effects on the integrity of historic buildings, structures, sites, and objects associated with the Lahaina NHL District:

October 1, 2024

- Removal of surface ash including up to six inches of soil from areas within and around historic buildings and structures;
- Removal of structural footings, foundations, chimneys, and basements;
- Removal of unsupported walls that have been identified as hazardous to debris removal teams;
- Demolition of “clearly destroyed” private residential and commercial structures; and
- Removal of marine vessels and debris.

These activities have had or likely will have adverse effects to the integrity of buildings and structures that contribute to the NHL District. They may also affect archaeological sites associated with historic buildings or that underlie historic and non-historic buildings within the footprint of surface ash or whose deposits may be disturbed by removal of foundations, chimneys, or basements.

### **Definition of Adverse Effect**

The Criteria of Adverse Effect per 36 CFR § 800.5 (the implementing regulations for Section 106 of the National Historic Preservation Act) includes the following definition:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.[ 36 CFR § 800.5(1)]

Of the examples of adverse effects on historic properties detailed in 36 CFR § 800.5(2), the following are most pertinent to current federal undertakings in the Lahaina NHL District: (i) “physical destruction of or damage to all or part of the property” and (ii) alteration of the property through stabilization and hazardous material remediation “not consistent with the Secretary’s standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines.” Future federal undertakings could also result in (iv) “Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance” and (v) “Introduction of visual, atmospheric or audible elements that diminish the integrity of the property’s significant historic features.”

### **SCOPE OF THE ASSESSMENT**

The assessment of effects for this Section 213 report focuses on physical destruction of or damage to all or part of the historic resources that contribute to the NHL District and alteration



October 1, 2024

of the property through stabilization and hazardous material remediation resulting from current federal undertakings. As noted in Section 1, the Lahaina NHL District nomination specifically identified a number of contributing resources including buildings, structures, sites, and objects. These included nine “principal” buildings and sites (including a cemetery), and an additional two buildings, fourteen sites (including two cemeteries), and one object. In addition, a number of historic sites were identified on a County of Maui map included in the nomination. Further resources associated with the period and areas of significance and located within the NHL boundary may not have been elaborated upon in the documentation but would be considered contributing. In Section 2, additional contributing historic resources were identified, including those of significance to Native Hawaiians in the form of sites, buildings, and structures. Additionally, other historic properties outside of the period of significance and not associated with the areas of significance of the NHL District were identified as compatible with the setting of the Lahaina NHL District but are not considered in this section.

The assessment of adverse effects conducted for the purpose of this Section 213 report considers the effects of the undertaking(s) on the Lahaina NHL District as it is currently defined by the 1974 nomination (see Section 1) as well as assessments of effects on those contributing resources within the boundary subsequently identified through cultural assessments, historic building surveys, archaeological fieldwork, and information sharing with Native Hawaiian Organizations and members of the Native Hawaiian Community of Lahaina. These other resources within the current boundary of the NHL District directly contribute to our understanding of the district and damage to these resources adversely affects the integrity of the NHL. Adverse effects to historic properties that date to the period of significance and are associated with one of the areas of significance of the NHL District but that are outside of the NHL District may affect the integrity of setting of the NHL.

The following detailed assessment addresses the contributing historic resources and character-defining features specified in Section 1, followed by an assessment of contributing historic resources identified in Section 2. The impacts of the wildfire are noted first, and then the effects associated with FEMA recovery undertakings. As noted above, this report does not address adverse effects to historic properties that are outside of the period of significance and not associated with the areas of significance of the NHL District.

## **DETAILED ASSESSMENT OF EFFECTS**

### **Wildfire Impacts**

The wildfire partially or wholly consumed many of the nineteenth and twentieth-century buildings within the NHL District (Figure 10). Of the principal buildings, structures, and sites noted in Section 1, the Maria Lanakila Catholic church was undamaged as was the Waine‘e Cemetery. For the other “principal” resources and including the Master’s Reading Room and Holy Innocents Episcopal Church, all combustible parts of the buildings including roofs, walls, windows, decks, and floors were damaged or incinerated (Table 3). Smoke soot was noted on stone masonry surfaces, and some of the masonry walls were collapsed. Coral stone was

October 1, 2024

variably impacted, with high heating of the fire making some coral extremely friable, while in other cases, damage to coral rock was limited to about an inch of the surface. Of the other historical buildings within the NHL District, most were constructed in the twentieth century, and while considered sympathetic to the setting of the NHL District, they were not contributing resources. Notwithstanding, their loss is a tremendous setback to Maui's historic preservation efforts.



*Figure 10. West façade of former financial institution at 712 Front Street, facing east. NPS Photo taken July 28, 2024.*

The wildfire did not directly impact the spatial organization and circulation patterns with respect to the street grid layout, paving, stone walls, and curbstones, and had minimal impacts on many park areas and cemeteries, including minimal impacts to cemetery headstones, monuments, and statuary. The wildfire did however kill or damage many of the trees and more substantial vegetation within the NHL District. As a consequence of this destruction, the wildfire also opened character-defining views and vistas to the West Maui Mountains and Lanai across the 'Au'au Channel that had been formerly blocked by modern development. This includes important Native Hawaiian views to Puulaina, Pu'uwaiohina, and Pa'upa'u hill, including David Malo's grave. The wildfire had no impact on the marine area which comprises

October 1, 2024

two thirds of the NHL other than to burn some non-historic vessels and piers in the small boat harbor and to add debris to the nearshore areas. These places were largely unchanged by the wildfire.

The wildfire largely did not impact subsurface archaeological resources and most of the Native Hawaiian sites documented within and near the Lahaina NHL District were not impacted. King Kamehameha III's Royal Residential Complex (SIHP #50-50-03-02967), including Moku'ula and Loko o Mokuhinia and Hale Piula, and the adjacent Waine'e Cemetery were not significantly impacted by the wildfire. Likewise, the Hauola Stone (SIHP #50-50-03-01202) and Kamehameha I's Brick Palace (SIHP #50-50-03-02951) which are recorded as archaeological sites, were not significantly impacted. Most of the fishpond sites are buried under fill and therefore were protected from the wildfire and even Loko Puako Fishpond (SIHP #50-50-03-04682) which is visible on the surface, was not impacted. Likewise, the wildfire did not have an impact on the stream courses that flank both sides of the NHL District. The wildfire did not impact the 'Au'au Channel within the NHL District, including Kapapalimuāpi'ilani and the Keawaiki and 'Uo surfing grounds. Hale Pa'i, which was noted as an important historic property to Native Hawaiians is on the campus of Lahainaluna High School and was not impacted by the wildfire.

### **Effects of Undertakings**

To date, FEMA undertakings do not appear to have affected the spatial organization and circulation patterns of the Lahaina NHL District. Extant contributing resources remain in their historic locations. The street grid, topography, views and vistas also remain intact. There is no indication that current FEMA undertakings (at the time of this report) will impact these character-defining aspects of the NHL District. Parks have not been impacted to date and will not foreseeably be impacted unless a building or structure on them burned, in which case cleanup activities may affect documented or undocumented archaeological resources. FEMA undertakings have not affected any of the NHL-documented historic cemeteries. The project has had virtually no impact on the marine area of the NHL, except for removal of non-historic, noncontributing debris, pilings, and anchors. The removal of hazard trees is expected to represent an adverse effect on presently undocumented groves of Indigenous trees that contribute to the setting of the Lahaina NHL District. Analysis of district streetscapes from historic photographs may be able to ensure selection and placement of native species when revegetation proceeds.

Table 3 summarizes impacts from the fires and effects of FEMA actions to the principal buildings and sites in the Lahaina NHL District. This analysis relies on surveys and analysis conducted by the American Institute of Architects (AIA) and draft reports by TCX. These reports summarized the damage from the fires and assessed the feasibility of rehabilitation for selected properties. To date, FEMA has identified three actions that will adversely affect three principal buildings, the Old Spring House, the Waine'e Church, and the Pioneer Hotel. In the case of the Old Spring House, the building can feasibly be rehabilitated, but the property owner,



October 1, 2024

at the time of writing of this report, does not have funding and has opted to have FEMA demolish it (Figure 11). After the fire, the standing walls of the Waine‘e Church were too damaged for shoring and there were no standing walls of the Pioneer Hotel indicating that it is not feasible to restore or rehabilitate either of these properties<sup>9</sup>.



*Figure 11. West façade of the Spring House with debris field in foreground and Pa‘upa‘u Hill and the West Maui Mountains in background. NPS Photo taken July 29, 2024.*

According to the independent assessments of the AIA and TCX, the Baldwin House, Court House, Hale Pa‘ahao, Hale Aloha Church, and United States Marine Hospital can feasibly be rehabilitated, and some are currently shored (Figure 12). In all cases, removal of ash and any removal of foundations or chimneys could impact as yet undocumented subsurface resources, including potential archaeological resources that are associated with the history of the buildings

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<sup>9</sup> On June 30, 2024, FEMA identified the demolition and removal of the remains of Waiola Church as “no historic properties affected with conditions,” and SHPO concurred (July 25, 2024), but the NHL Nomination clearly calls out the 1953 Waiola church as a contributing resource tied to the Waine‘e Church and Cemetery (Apple 1974:15).



October 1, 2024

and that contribute to the NHL District, or that reflect the practices and places of pre-unification Lahaina.

Of the other two buildings either directly noted in the 1974 NHL documentation for the district or listed in the walking tour brochure, the Master's Reading Room has been shored with the expectation that the building will be restored or rehabilitated if feasible. The draft TCX report suggests the Holy Innocents Episcopal Church cannot be rehabilitated as it was entirely consumed by the wildfire. It is expected that the FEMA undertaking will have an adverse effect on this property through destruction of its remaining historic features including its foundations and potential impacts to as yet undocumented archaeological resources. As this site is adjacent to Loko o Mokuhinia and is associated with pre-unification and nineteenth-century Native Hawaiian building sites, it is likely that subsurface archaeological deposits will be encountered that are within the period of significance and associated with the royal complex and monarchy. If these archaeological resources have integrity and relate to one of the areas of significance, then they are contributing resources to the NHL District and subsurface disturbance would represent an adverse effect.



*Figure 12. United States Marine Hospital, looking northeast. Pu'ulaina Cone is visible in the background. NPS Photo taken July 31, 2024.*

October 1, 2024

**TABLE 3. ASSESSMENT OF EFFECTS TO PRINCIPAL BUILDINGS, STRUCTURES, AND SITES**

Name	Impacts of the Wildfire	Effects of FEMA Undertakings
The Baldwin House (1835)	All combustible parts of the building consumed, walls damaged but still standing, grounds impacted but largely intact.	Walls shored, building can feasibly be rehabilitated; potential impacts to undocumented subsurface resources.
Old Spring House (1823) <sup>1</sup>	All combustible parts of the building consumed, walls still standing	<b>Adverse.</b> Anticipated destruction of remaining historic features; potential impacts to undocumented subsurface resources.
Court House (1859–1929) <sup>1</sup>	All combustible parts of the building consumed, walls still standing, Banyan tree damaged	Building can feasibly be rehabilitated; shoring plan; potential impacts to undocumented subsurface resources.
Old Prison (Hale Pa‘ahao, 1858) <sup>2</sup>	Gatehouse and cells destroyed. Walls still standing.	TCX shoring plan; potential impacts to undocumented subsurface resources.
Waine‘e Church (1828) & Cemetery (1823) <sup>2</sup>	All combustible parts of building consumed, east gable collapsed, masonry gables damaged	<b>Adverse</b> <sup>3</sup> . Anticipated destruction of remaining 1953 features; potential impacts to undocumented subsurface resources associated with church uses and pre-1828 Native Hawaiian sites. No effect to cemetery.
Hale Aloha Church (1858) <sup>1</sup>	All combustible parts of the building consumed, walls damaged but still standing, coral wall portions highly damaged, bell tower destroyed, outbuildings destroyed, grounds impacted.	Building can feasibly be rehabilitated; shoring plan; potential impacts to undocumented subsurface resources.
United States Marine Hospital (ca. 1842) <sup>1</sup>	All combustible parts of the building consumed, walls still standing	Building can feasibly be rehabilitated; shoring plan; potential impacts to undocumented subsurface resources.
Roman Catholic Church (Maria Lanakila - Our Lady of Victory, 1927–28)	Undamaged	No historic properties affected.
Pioneer Hotel (1901)	All combustible parts of the building consumed	<b>Adverse.</b> Anticipated destruction of remaining features; potential impacts to undocumented subsurface resources.

Notes: 1. Analysis by AIA Architects and TCX. 2. TCX Analysis only. 3. See footnote 12.

October 1, 2024

The two cemeteries documented in Section 1, the Episcopal Cemetery and the Seaman's Cemetery are not expected to be affected by the FEMA project. With proper precautions, other sites will not be adversely affected by the FEMA undertakings, including the Richards House Site.

### **Native Hawaiian Cultural Resources**

Of the properties identified as Native Hawaiian cultural sites that are within the boundary of the NHL District and that date to the period of significance, only the Waine'e church noted above may be adversely affected (Figure 13). For King Kamehameha III's Royal Residential Complex (#50-50-03-02967), including Moku'ula and Loko o Mokuhinia and Hale Piula, only in those areas where there were buildings that were destroyed will FEMA actions to remove ash and foundations potentially adversely affect the site. This is most likely within the burnt structures on the south side of Malu Ulu O Lele Park where the Salvation Army stores were located (Figure 14).

Kamehameha I's Taro Patch site is not expected to be affected except where the ash and foundations of the Pioneer Hotel will be removed. The archaeologically documented portion of the site, (#50-50-03-06491) consists of intact rock wall segments close to the Pioneer Inn and the Lahaina Public Library. Removal of foundations could adversely affect yet to be documented archaeological resources that contribute to the NHL District. Likewise, the site of the *ko'a* (shrine) and *heiau* (temple) near 505 Front Street could be adversely affected if FEMA (or another agency-associated undertaking) removes foundations and basements associated with this property and encounters intact material remains of these properties. Any cleanup of ash or of buildings/structures that burned within sites that have not yet been extensively surveyed or tested by archaeologists, including Luakini Street (associated with the Princess Nāhi'ena'ena procession in 1837), David Malo's House site, Hoapili's House site, Pa Halekamani, Nāhi'ena'ena's House site, Government Market site, Canal site, and the Council House site should address potential effects on potential archaeological resources. It is not expected that cleanup actions will affect the Hauola Stone, although any undertakings near this object should take into consideration the potential effects of vibrations or ground disturbance that might dislodge or move its constituent boulders.

Other Native Hawaiian-attributed archaeological sites consisting of subsurface cultural deposits and walls that date to the nineteenth century and earlier are contributing sites of the Lahaina NHL District. These include at least five sites: #50-50-03-04118, #50-50-03-04690, #50-50-03-04754, #50-50-03-06384, and #50-50-03-08500. Two of these (#50-50-03-04118 and #50-50-03-04690) are adjacent to Loko o Mokuhinia and the Loko Puako Fishpond and likely represent activity areas of high-status individuals, while site #50-50-03-08500 is situated about 180 m south southeast of the Waine'e Church and cemetery. Site #50-50-03-04754 is within Courthouse Square, while site #50-50-03-06384 is just south of the historic canal.



October 1, 2024



*Figure 13. Standing walls of the Waiola (Waiola) Church with Waiola Cemetery to left, looking west. Lanai is visible in the background. NPS photo taken July 31, 2024.*

Based on prior archaeological research, pre-unification and monarchy-era burial sites associated with Lahaina NHL District are often intact or partially intact and contribute to the Native Hawaiian setting of the NHL District, in particular their association with the Native Hawaiian royal center and monarchy. Archaeologists have recorded these burial sites along the shoreline, sometimes in buried or surface burial platforms. FEMA removal of ash remains, foundations, chimneys and basements have the potential to disturb or otherwise adversely affect these burials. The risk of discovery of burials is particularly high as there has not been any comprehensive survey of the district for pre-unification or nineteenth-century burial sites. As noted above, other important Native Hawaiian sites lie outside of the NHL District boundary, including the burial platform sites in Kelaweia, that may also be adversely affected. As noted in Section 3, the ATP (Archaeological Treatment Plan) is designed to avoid, minimize, or mitigate potential adverse effects associated with the anticipated cleanup.

October 1, 2024



*Figure 14. Site of Moku'ula Island and Loko o Mokuhinia with remains of the Waine'e Church in the background, looking east. Pa'upa'u Hill, and the West Maui Mountains are in the far background. NPS photograph taken July 31, 2024.*

This evaluation does not include potential damage to later twentieth-century historic or archaeological resources including historical refuse deposits and pits, sea wall and boundary wall segments, and curbstones that post-date the NHL period of significance. Likewise, later colonial immigrant burials that have been documented, while historically significant to the history of Lahaina, reflect periods outside of the NHL District's period of significance. Many of the archaeological sites were identified under subsurface survey or using minimal testing, and it is possible that some may contain components that date to the period of significance for the NHL District and represent materials associated with one of the areas of significance for the NHL District.



October 1, 2024

## SECTION 5: INTEGRITY ASSESSMENT

This section provides an assessment of aspects of integrity that apply to the Lahaina NHL District, taking into consideration impacts of the fire and effects of federal undertakings. The assessment is based on an evaluation of present conditions during NPS site visits in August 2024, and incorporates information shared by federal, state, and local agencies, Native Hawaiian Organizations, Lahaina Native Hawaiian Community members, and other partners. It addresses the integrity of resources identified in the 1974 NHL nomination as well as resources detailed in Section 2 of this report that were identified after 1974 that relate to the NHL areas of significance. This includes elements of the historic environment that are significant to Native Hawaiians.

Prior to the 2023 fire, new construction and infill posed the most significant threat to the integrity of the Lahaina NHL District. The effects were already being recognized at the time of designation in 1962 (Hussey 1962). The year prior, Maui County adopted an interim zoning ordinance establishing the downtown core as a county historic district. In 1967, the county passed Ordinance No. 514 to ensure that “the qualities relating to the history and culture of the County of Maui be preserved” (County of Maui 1967). The ordinance created the Maui Historic Commission and authorized designation of two county historic districts in Lahaina. District 1 contained all the extant buildings identified in the NHL nomination, sites along the waterfront, and the sites of Loku o Mokuhinia and Waine’e Cemetery. District 2 encompassed additional areas primarily composed of commercial development between Front and Luakini Streets and was established with the purpose of preserving the unique architectural character of Lahaina. The ordinance also specified restrictions on architectural styles, building heights and setbacks, and signage within the two districts.

Although the ordinance helped retain Lahaina’s historic character to a degree, architectural controls did not extend to areas of the NHL beyond the two county districts. The law also allowed for “variances” within the districts when compliance with provisions “would cause practical difficulty or unnecessary hardship.” Additionally, “nonconforming” construction projects that existed or were underway when the ordinance was adopted were permitted to continue “provided that such nonconforming use may not be enlarged, nor changed into a different nonconforming use” (County of Maui 1967). As a result, new development continued to impair some aspects of the NHL District’s integrity, including by interrupting sightlines and introducing incompatible architectural characteristics.

As part of its responsibilities, NPS maintains relationships with NHL owners, monitoring the condition of NHLs under a number of authorities (16 U.S.C. § 1a-5(a) and 36 C.F.R §65.7) In 2006, the NPS listed the condition of the Lahaina NHL as “under watch,” based on threats associated with development pressures, new construction and additions, non-conforming signage, and frequent changes in property ownership. The information regarding condition and threats was provided by the County and NHL program personnel did not visit the district. The “under watch” status signaled where impending actions or circumstances could cause a loss of

October 1, 2024

the NHL's integrity. In 2008, NPS, listed the condition of the Lahaina NHL District as "threatened" by unpermitted improvements, a condition noted earlier by Fox (1985:242). The condition "threatened" meant that the NHL suffered or was in imminent danger of a severe loss of integrity. NHL staff had visited Lahaina in 2007 for an orientation to the NHL district. The County once again provided information and with the general site visit informed the "threatened" listing.

In 2016, a reconnaissance-level architectural survey commissioned by the County of Maui concluded that "the subdivision and development of former plantation lands in Lāhainā and nearby Lahainaluna have drastically changed the setting, feeling, and association of resources situated within the district, and the development of commercial properties and building demolitions conducted for parking lots have diminished the district's historic character." Based on this assessment, the report recommended consulting with SHPD and the NPS NHL Program to revise the district boundary to "better reflect Lāhainā's local, state, and national levels of significance and eliminate those areas and resources that no longer convey the historic importance of the community" (Stuart et al. 2016: 42).

The 2016 study provided the most complete inventory to date of the numbers, types, and integrity of historic buildings in Lahaina. It also brought further attention to threats identified in previous NPS monitoring reports. However, its usefulness in characterizing the present integrity of the NHL District for the purpose of this Section 213 Report is limited. First, the survey focused almost entirely on the integrity of individual buildings. It did not include a comprehensive evaluation of archaeological resources, landscape features, or the spatial and visual relationships between resources that also are integral to the integrity of the NHL District. Most importantly for the present study, the 2023 fire resulted in severe damage or loss of a substantial portion of the built environment assessed in 2016, creating significant changes in the material and visual character of the NHL. The integrity assessment that follows takes these factors into consideration.

To qualify for NHL designation, a property must "possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association" (36 CFR § 65.4(a)). This means that a property must retain essential physical characteristics that convey its national significance to a high degree. The expectation for integrity of NHLs is greater than that required by the National Register of Historic Places (NPS 2023:56).

Based on the present NPS assessment, the Lahaina NHL District appears to retain a high degree of integrity, particularly the aspects of location, setting, feeling, and association. While the destructive impacts of the fire on the built environment resulted in diminished integrity of materials, design, and workmanship of many contributing buildings, other resources such as subsurface archaeological sites, cultural landscape features, and sites associated with important events and individuals from pre-unification Hawai'i through the monarchy period continue to convey their historic and cultural significance. The circulation system including walks and the historic street grid is retained. The spatial and visual relationships between contributing



October 1, 2024

resources also remain largely intact, and the district retains a high degree of overall integrity. Significant resources that were not included within the NHL boundary, such as Hale Pa‘i on the Lahainaluna campus and David Malo’s gravesite on Pa‘upa‘u, were also unaffected by the fire.

Components of the federal undertakings that have resulted in (or that may result in) loss of integrity include demolishing remaining historic fabric of some contributing buildings and damage to both documented and previously undocumented subsurface and cultural landscape resources (refer to Section 4). As of this writing, some sites of cultural significance, including burials, have been identified during clean-up activities. Some fire-damaged contributing buildings have been shored to, in part, prevent further loss of integrity.

Additional considerations related to the historic character of the built environment resources of the NHL District inform this assessment. First, several historic buildings destroyed or severely damaged during the fire date to the twentieth century. Those identified in the 1974 NHL documentation include the Pioneer Hotel, the Hongwanji Mission and Tower, and the Lahaina Jodo Mission Temple. While significant individually and as part of the setting of Lahaina, these buildings are only indirectly related to the national significance themes identified in the 1974 nomination and in Section 2 of this report. Their loss does not compromise the integrity of the district to a substantial degree.

Additionally, many contributing buildings damaged in the fire had previously been rebuilt or undergone substantial restoration. The Waine‘e Church and Episcopal Church were rebuilt in 1953 and 1927, respectively, on their historic sites but not using historic plans. The Courthouse was rebuilt in 1925, although with the basic coral block structure intact. The Baldwin House and Master’s Reading Room were both restored between 1962 and 1974. The Marine Hospital was noted as being in “fair condition” in the 1974 nomination. The building was reduced to a ruin by the late 1970s before undergoing restoration in the early 1980s. Hale Aloha was described as being in a “ruinous condition” in the 1974 nomination but was restored in stages between the 1970s and early 1990s. Independent assessment by TCX (coordinated through FEMA) determined that restoration is feasible for all these buildings with the exception of the Waine‘e and Episcopal Church buildings (refer to Section 4). Historic American Buildings Survey (HABS) drawings and records of previous restoration projects are available to inform plans to restore or rehabilitate many of Lahaina’s contributing buildings. Thus, treatment options may be available that conform to the Secretary of the Interior’s Standards and ensure that essential aspects of integrity are retained.

The NHL Bulletin identifies specific considerations for evaluating integrity of archaeological resources (NPS 2023:74–75). Because they are often subsurface and largely not visible, many archaeological sites do not correspond with aspects of integrity that apply to other types of resources. For properties under consideration for NHL Criterion 6, which is the criterion applied to archaeological properties “that have yielded or may be likely to yield information of major scientific importance,” the bulletin recommends evaluating “the ‘professionally demonstrated intactness’ of a property’s deposits and features to the extent that they can address

October 1, 2024

nationally significant research questions” (NPS 2023: 45, 74). For archaeological resources evaluated under other criteria, it is necessary to consider to what extent the resources materially connect to those criteria, or in the case of Criteria 1 and 2, provide important cultural context for understanding significant events or the lives of significant individuals (NPS 2023:75).

Research conducted for this report suggests that several documented archaeological resources in Lahaina likely meet the above conditions for a high level of integrity. For example, archaeologists have revealed the presence of intact wetland deposits, perimeter walls, the causeway, activity surfaces, middens, and burials associated with Moku‘ula Island and Mokuhinia pond. Scholars have also suggested that the recovery of belongings of Hawaiian royalty that dwelt on the island may yield information regarding the lives of important individuals and major events in the history of the monarchy (Klieger 1998; Lee-Grieg et al. 2017; Major and Klieger 1995; Six 2012). Archaeologists have documented material remains that show how the pond developed and how Native Hawaiians integrated agricultural crops into the environment during the period of settlement. Thus, the physical remains are sufficiently intact to provide a pre-unification context for the important events that occurred in Lahaina. Likewise, the spatial organization of fish and *kalo* ponds and associations with burials and platform mounds are retained and can inform research questions related to the royal capital and the Hawaiian concept of *pilina*.

As documented in Section 1, there are a number of historic sites listed on the walking tour brochure and the county historic district maps that have not been positively identified. Historical archaeology combined with oral history, and historical research, are needed to assess if these sites contain sufficient integrity to convey the period of significance and areas of significance of the NHL District. For example, research could inform the assessment of the integrity of the house site of Maui Governor Ulamāheihei Hoapili, who was central in the governmental and cultural affairs of Lahaina during the period of significance. Hoapili’s house site was identified by Native Hawaiian Organizations and Native Hawaiian community members as significant in the history of Lahaina and the Hawaiian monarchy (see Section 2).

The NHL Bulletin provides additional guidance for properties possessing intangible cultural values or where cultural values are connected to the natural environment. For these resources, the bulletin notes that integrity of design and workmanship may be less important than feeling and association in conveying significance (NPS 2023:69). In Lahaina, this applies to locations of former fishponds and other historic water features where freshwater is currently visible on the surface. Examples include the site of Loko o Nalehu at 505 First Street, Loko o Puako north of Loko o Mokuhinia, the canal marking the northern border of Mokuhinia, and a water feature located under a concrete slab near the intersection of Canal and First Streets, likely associated with an unnamed pond north of the canal basin. The presence of water on the landscape provides a powerful physical link to Lahaina’s cultural environment during the pre-unification and monarchy periods and suggests that restoration of select sites may be feasible. The ‘Uo surf break is another example of a dynamic natural feature that retains much of its cultural value and physical characteristics and is directly related to important events and individuals in the NHL

October 1, 2024

period of significance (Figure 15). These sites are integral to the NHL's integrity of location, setting, feeling, and association and are important in conveying the district's cultural and historic significance.



*Figure 15. A surf break taken from the site of site of Hale Piula within the Lahaina Roads anchorage with the Island of Lanai in the background. This is an example of nā 'ikena kai.*

Views and viewsheds identified in the 1974 nomination are also preserved, demonstrating integrity of setting, feeling, and association. These include views inland from the coastal areas toward the West Maui Mountains and across the 'Au'au Channel, including the anchorages, to Lāna'i. Additionally, while the fire caused substantial destruction of the built environment and vegetation, it also further opened viewsheds and revealed contours of the land and individual resources, such as the Spring House, that had previously been concealed by development. The result is a cultural landscape that in certain respects is more reminiscent of the appearance of pre-unification and monarchy period Lahaina than what existed prior to the fire.

These landscape-level views may be intrinsic to Native Hawaiian understanding of the national significance of Lahaina. That is, these views include visibility of the mountains and former agricultural lands, as well as views across the 'Au'au Channel. Although altered by modern development, landscape modifications related to sugarcane planting, and introduction of non-

October 1, 2024

native plant species, existing viewsheds continue to convey the mountains-to-sea connectivity that in part defines Lahaina as a Native Hawaiian cultural landscape.

Finally, the present Lahaina community consists of lineal descendants of *ali ʻi* and other Hawaiian residents of Lahaina during the monarchy period and earlier. Some families retain ownership of land parcels that have been passed down through the generations. This genealogical continuity is an important contributing factor to Lahaina's integrity of feeling and association and demonstrates its continuing cultural significance as a Hawaiian place to the present day. This element of integrity is most clearly represented in burial sites associated with lineal descendant families in Lahaina and in family connections to particular places on the landscape.

October 1, 2024

## **SECTION 6: RECOMMENDATIONS TO AGENCIES**

Agencies may assist in rebuilding Lahaina through direct involvement in planning and project implementation, or providing federal funds and grants, or through federal permitting. Each of these types of federal undertaking will require historic preservation planning and management including compliance with Section 106 of the National Historic Preservation Act. Agencies will have the opportunity to consult and collaborate with Native Hawaiian Organizations, the Native Hawaiian Community of Lahaina, non-profits, owners, and the business community to develop appropriate approaches to rebuilding Lahaina that balance the need for recovery with preservation of the NHL District. This section provides recommendations for how agencies can best meet the needs for historic preservation during the important recovery efforts in Lahaina. We recommend an update to the NHL documentation for Lahaina, suggest ways to better integrate historic preservation in the rebuilding of Lahaina, and recommend strengthening consultation and collaboration with Native Hawaiian Organizations and the Native Hawaiian Community of Lahaina.

### **UPDATE THE NHL DOCUMENTATION**

Agencies are encouraged to support an update to the NHL nomination to incorporate archaeological, architectural, historical, and Native Hawaiian cultural information collected since 1974. This includes information collected as part of the cleanup efforts. This update would require supplemental research for:

- Reassessment of the period and areas of significance to address nationally-significant events and people associated with Native Hawaiian history of Lahaina before the nineteenth century and that represent Native Hawaiian cultural persistence in the nineteenth and twentieth centuries (see Section 2);
- Identification of all contributing properties (buildings, structures, sites, and objects) that are associated with the national significance of the NHL District; and
- Reconsideration of the NHL boundary to encompass all resources identified as contributors to the NHL, including those associated with changes in period of significance and areas of significance, as noted above.

Supplemental research should:

- Include historic property surveys and archival research including Hawaiian language sources;
- Include community outreach, and oral histories including those prepared for Lahaina as part of the FEMA undertakings; and
- Be carried out by scholars and cultural practitioners who are knowledgeable experts in Native Hawaiian history and culture, archaeology, and historical architecture.

The update should be initiated with a letter of inquiry for submission to the NHL program following procedures in the NHL Bulletin (NPS 2023).

October 1, 2024

## **INTEGRATE HISTORIC PRESERVATION IN REBUILDING LAHAINA**

CFR Part 36 § 800.10 requires that federal agencies “to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected by an undertaking.” Federal agencies are advised to seek opportunities and take actions to avoid and minimize adverse effects to the Lahaina NHL District. This should include:

- Support for the identification, retention, and preservation of archaeological and historic sites and landscape features that contribute to the historic character and cultural significance of the NHL, including character-defining features of building sites and the district:
  - Stone walls and the circulation system (walks, paths, roads, and the street grid);
  - Surviving viable vegetation;
  - Landforms, and water features, including streams and ponds;
  - Subsurface archaeological resources, and
  - Other cultural and religious features, including cemeteries.
- Support for undertakings that retain the historic relationships between contributing cultural resources, including the archaeological sites associated with the royal center of Lahaina and the complex of missionary buildings and waterfront, and those that preserve critical open space, including parks.
- Preserve important views or visual relationships, including views to the West Maui Mountains, Lanai across the ‘Au‘au Channel, and other geographic places of significance to Native Hawaiians including *kula* lands, Pu‘ulaina cone, Pa‘upa‘u hill, and Lahainaluna School.
- When considering new construction, minimizing impacts to historic spatial relationships and avoid contributing archaeological sites and landscape features.
- Balance the need for new construction and compatibility with the historic character of the NHL setting.

If agencies cannot avoid adverse effects to the Lahaina NHL District, they should propose mitigation that is preservation focused, such as:

- Establishing a mitigation preservation fund that they and other federal agencies can contribute to for the purpose of implementing preservation treatments for contributing resources to the NHL District, including buildings, structures, sites, and landscape features;
- Supporting the planning and development of a preservation plan for Lahaina that addresses all resources that contribute to the significance of the NHL District, including buildings, structures, sites, and objects, and concentrates on ways to encourage compatible development to preserve the integrity of the NHL District;
- Supporting development of an archaeological overview and assessment to summarize past information in a holistic fashion, outline relevant research questions, and identify

October 1, 2024

target areas and methods for future surveys to locate, evaluate, and document archaeological resources; and

- Collaborating with local and state agencies, Native Hawaiian Organizations, and the Native Hawaiian Community of Lahaina in the planning and implementation of specific historic preservation projects in the NHL that are carried out in accordance with the SOI Standards for the Treatment of Historic Properties. These might include:
  - Restoration of contributing buildings and other resources including the cultural landscape; and
  - Reconstruction of historic buildings and other resources that contribute to the NHL District that were consumed by the wildfire, or otherwise are of particular significance to the NHL District.

## **STRENGTHEN CONSULTATION AND COLLABORATION**

Lahaina's special place in the history of Maui and the Hawaiian monarchy argues for federal agencies strengthening their efforts to consult and collaborate with Native Hawaiian Organizations and the Lahaina community, including the Native Hawaiian community members, for undertakings that may impact the NHL District. As part of this, many sites of importance to Native Hawaiians are represented as archaeological sites, and these should be addressed as places that may require specialized knowledge by Native Hawaiian practitioners to fully assess their significance and integrity. Federal agencies should consider supporting:

- Cultural sensitivity training and cultural monitoring using local community members and Native Hawaiian Organizations. Training should address all cultural resources and conditions that are specific to Lahaina and West Maui, including archaeological, historic, and cultural sites.
- Employ cultural practitioners and traditional construction techniques/trades in the planning and implementation of restoration work of traditional Native Hawaiian buildings and landscape features.
- Reuse or repurpose stone materials salvaged from fire cleanup activities associated with prior historic preservation projects that are culturally significant to Native Hawaiian people and culturally appropriate to reuse.
- Timely identification and documentation of cultural and archaeological resources (survey and testing/evaluation) to ensure that contributing sites, including Native Hawaiian cultural sites are not damaged.
- Early recognition and planning for the likelihood of encountering burials and preparing and following plans to avoid burials or address inadvertent discovery. This could include streamlined procedures for documentation and treatment.
- Archaeology that recognizes that Lahaina's archaeological resources include pre-unification Native Hawaiian deposits and deposits from the nineteenth and twentieth centuries. Archaeologists conducting work in Lahaina should be skilled in both traditional Native Hawaiian and later period historical archaeology.



October 1, 2024

- Ensuring that archaeological collections, including artifacts and records address curation standards and are curated in an appropriate repository per 36 CFR § 79. This will safeguard sensitive belongings and archaeological remains and facilitate their appropriate treatment and access for future generations.
- Interpretation of the unique history of Lahaina that incorporates the perspectives of Native Hawaiian people and local families.

October 1, 2024

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October 1, 2024

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October 1, 2024

## APPENDIX A. RECORDED ARCHAEOLOGICAL SITES WITHIN THE NHL BOUNDARY

Name/description	SIHP Site No.	Notes
Hauola Stone	50-50-03-01202	Native Hawaiian, on walking tour brochure
Aus Site	50-50-03-01797	19 <sup>th</sup> and 20 <sup>th</sup> century historical
Kamehameha I's Brick Palace	50-50-03-02951	Native Hawaiian, on walking tour brochure and 1974 photos
King Kamehameha III's Royal Residential Complex (including Moku'ula Island, Loko Mokuhinia, and Hale Piula)	50-50-03-02967	Native Hawaiian, on walking tour brochure
Subsurface Cultural Deposit	50-50-03-04118	Native Hawaiian, 19 <sup>th</sup> century
Loko Puako Fishpond, Lahaina	50-50-03-04682	Native Hawaiian
Subsurface Cultural Deposit/Boundary Wall, Lahaina	50-50-03-04690	Subsurface cultural deposit and wall
Subsurface Deposit, Lahaina	50-50-03-04754	In Court House Square, pre-unification cultural stratum, c. AD 1420–1660
Post-contact Pavement	50-50-03-05174	'ili'ili pavement and a refuse pit
Historic Trash Dump, Pana`ewa	50-50-03-05180	Japanese and other historic-period refuse
Historic Refuse Pits, Puako	50-50-03-05203	20 <sup>th</sup> century refuse pits from house
Sea Wall & Cesspool	50-50-03-05643	Sea wall prior to 1919 and 20 <sup>th</sup> century cesspool
Subsurface Cultural Layer	50-50-03-05701	1920s–1930s historical refuse
Historic Wall Remnant	50-50-03-05761	Buried wall remnant
Sea Wall	50-50-03-06370	Pre-1964 sea wall
Refuse Pits	50-50-03-06382	Late 19 <sup>th</sup> century refuse pits
Concrete Foundation	50-50-03-06383	c. 1913 building foundation
Subsurface cultural layer	50-50-03-06384	Native Hawaiian traditional culture deposit
Rock Wall Segment	50-50-03-06491	Native Hawaiian, Kupukaiao Taro Patch site (walking tour brochure)
Historical Refuse Deposits	50-50-03-06493	Native Hawaiian? 19 <sup>th</sup> to early 20 <sup>th</sup> century historical refuse
Historic Wall	50-50-03-06680	20 <sup>th</sup> century basalt wall
Historic Wall	50-50-03-06681	20 <sup>th</sup> century basalt wall
Historic Refuse Layer	50-50-03-06683	Late 19 <sup>th</sup> to early 20 <sup>th</sup> century refuse deposit
Scattered Midden & Artifact Scatter	50-50-03-08500	Native Hawaiian traditional cultural deposit
Curbstone alignment	50-50-03-08870	Historic curbstone
Historic Artifact Scatter	50-50-03-08979	Asian immigrant refuse deposit