



EXHIBIT 15



MEMORANDUM

To: Keiki-Pua S. Dancil, Ph.D., SVP Pūlama Lāna‘i
Fr: Trisha Kehaulani Watson, J.D., Ph.D.
Honua Consulting, LLC
Re: *Criterion “e” Evaluation for Kō‘ele Structures C and D*
Date: January 20, 2025

Honua Consulting, LLC, completed an evaluation of the Kō‘ele Structures C and D under significance criterion “e”. MASON completed an integrity assessment and evaluation of Criterion a, b, c, and d.

Criterion "e" under HAR §13-284-6 applies to properties that hold important value to Native Hawaiian people or other ethnic groups in Hawai‘i due to their associations with cultural practices, traditional beliefs, events, or oral histories. These associations must be significant to the group's history and cultural identity. Properties may qualify if they were historically used for cultural practices or if those practices are still carried out at the site today. Additionally, a group of sites can collectively meet the significance criteria under Criterion "e" emphasizing their combined importance in preserving cultural traditions and identity.

Both the Forbes House (Structure C) and the Ranch Office & Store (Structure D) are tied to the history of daily operations and social fabric of Lāna‘i Ranch. These buildings served as hubs for ranch management, with the Forbes House originally functioning as the residence for the ranch bookkeeper and later housing various residents, including ranch foremen and their families. The Ranch Office & Store, similarly, was a center for ranch administration and commerce before transitioning to residential use.

The use of the structures has changed substantially over time.

- The Forbes House (Structure C) was home to generations of families tied to ranching and later to residents working in different capacities on the island.
- The Ranch Office & Store (Structure D) was repurposed as a residence and now being used for Pūlama Lāna‘i operations.

Martha Evans¹ and Hermina Morita² both emphasize the importance of maintaining the buildings in their current locations to preserve the historical and cultural identity of Kō‘ele. Evans underscores the sense of place and community identity tied to these structures, pointing out their connection to families and cultural practices associated with Lāna‘i Ranch. She argues that relocating the buildings to a site previously used for pineapple farming would erase their contextual and historical significance.

Morita, drawing from her extensive historical research, advocates for a preservation plan that maintains the buildings’ proximity to their original sites. She highlights their role as the last tangible links to the island’s ranching era and stresses their potential to educate residents and visitors about Kō‘ele’s layered history. Morita also contrasts the current situation with a previously missed opportunity to preserve the Kō‘ele School building, which was relocated but later neglected.

While there is certainly tremendous nostalgia and fondness for the structures, as MASON noted, the structures no longer retain sufficient integrity to be eligible for the state or national register. That nostalgia clearly transferred with the structures across its two relocations. Despite the clear testimony to preserve the structures, none of the testimony provided or any of the history research provides sufficient evidence to justify the structures have “important value to the native Hawaiian people or to another ethnic group of the state due to associations with cultural practices once carried out, or still carried out, at the property or due to associations with traditional beliefs, events or oral accounts-- these associations being important to the group's history and cultural identity,” and therefore **do not meet the requirements of significance under criterion “e”**. The history and associations are not specific to native Hawaiians or another ethnic group, nor are there associations with cultural practices.

¹ Testimony from Martha Evans sent via email to Maui County Council Housing and Land Use (HLU) Committee (HLU-23 (Bills 23,24, 25), email dated September 13, 2024.

² Testimony from Hermina Morita sent via email to Maui County Council Housing and Land Use (HLU) Committee (HLU-23 (Bill 24 (2024) and Bill 25(2024)), email dated September 05, 2024.



Figure 1. Study Area noting the location of Structures C and D, and the non-historic garage (not in MASON's Survey Area) (Base map, Google Earth, 2014; Graphics, MASON, 2024).

Image from MASON RLS, identifying location of Structure C and Structure D.