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June 13, 2025

State Historic Preservation Division  
Department of Land and Natural Resources  
601 Kamokila Blvd, Room 555  
Kapolei, HI 96707

**Subject: Formal Opposition to the Nomination of Hakalau Plantation (29-2306 Old Māmalahoa Highway) to the Hawai'i Register of Historic Places**

Dear Members of the Hawai'i Historic Places Review Board,

As Mayor of the County of Hawai'i, I respectfully submit this letter of opposition regarding the proposed nomination of the **Hakalau Plantation property, located at 29-2306 Old Māmalahoa Highway, Hakalau, Hawai'i 96710**, for inclusion in the Hawai'i Register of Historic Places.

While we recognize and value the importance of preserving sites that reflect the cultural and economic history of our island, this particular nomination raises significant concerns—both practical and procedural—which I believe warrant your serious consideration.

### **1. Restrictive Limitations on Property Maintenance and Use**

Once a property is listed on the State Register, any effort to repair, replace, or improve the structure becomes subject to preservation guidelines that are often inflexible and burdensome. For Hakalau residents and property stewards, this may translate to delayed or denied approvals for critical maintenance, especially when replacement with modern, safe, or cost-effective materials is necessary. The County believes that such limitations place an unreasonable burden on private owners and discourage proactive upkeep.

### **2. Increased Financial Burden Without Support**

Designation can trigger compliance costs far beyond what is feasible for residents or organizations in small, rural communities. The County is also concerned about the lack of accessible financial support or grant mechanisms to offset these costs. Historic designation without assistance leads to the paradox of preserving in name only—while actual structures continue to deteriorate due to unaffordable mandates.

### **3. Insufficient Demonstration of Historical Integrity**

While the Hakalau Plantation undoubtedly played a role in Hawai'i's sugar industry history, the remaining structures and condition of the site, as submitted in the nomination, do not appear to meet the high bar of architectural or historical integrity outlined in HAR §13-284. The Plantation's

broader legacy is already well documented and represented in other sites across the island, and this specific location does not clearly offer new or unique contributions that justify state-level designation.

#### **4. Impact on County Planning and Infrastructure**

This nomination may conflict with long-term land use planning and rural revitalization strategies identified in the County General Plan and the Hāmākua Community Development Plan. Designation can impede future adaptive reuse or infrastructure improvements that may be needed for resilience, housing, or public services. Flexibility is essential in areas like Hakalau, where the County and community must plan for both cultural preservation and growth.

#### **5. Lack of Community Consensus**

Our office has received input from community members who were unaware of the nomination and who oppose the designation due to concerns about future land use limitations, economic impact, and lack of transparency in the process. The voices of local residents must be a central part of any historic designation process, especially in rural districts where livelihoods and heritage are closely interwoven.

For these reasons, I urge the Hawai'i Historic Places Review Board to **deny the nomination of the Hakalau Plantation property to the State Register**. We remain committed to working in partnership with SHPD to identify truly significant sites for protection—while also ensuring that designations are equitable, community-supported, and sustainable for future generations.

Mahalo for your time and thoughtful consideration.

Sincerely,



C. Kimo Alameda, Ph.D.  
Mayor of Hawai'i