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May 21, 2018

State Land Use Commission  
P.O. Box 2359  
Honolulu, HI 96804

SUBJECT: DR18-61 Hartung Brothers Hawaii LLC. For Declaratory Order to Designate Important Agricultural Lands for approximately 463 acres at Kunia, O`ahu; TMK (1) 9-2-004-006(por.), -011, and -012 (por.) Kunia, Oahu, Hawai'i.

Dear Chair Wong and Commissioners:

I am Randy Cabral, President of the Hawaii Farm Bureau (HFB). Organized since 1948, the HFB is comprised of 1,900 farm family members statewide, and serves as Hawaii's voice of agriculture to protect, advocate and advance the social, economic and educational interest of our diverse agricultural community.

**HFB supports** Hartung Brothers' petition to designate lands in Kunia as Important Agriculture Lands.

The Hawaii Farm Bureau has long supported Hawaii's Constitutional Mandate to preserve and protect Hawaii's Important Agricultural Lands (IAL). Since the adoption of Act 183 (2005), the process of voluntary IAL designation has been proceeding. We were pleased when the first lands were designated by Alexander and Baldwin in 2009 totaling nearly 4000 acres in Kauai. Today, we have over 101,000 acres that were voluntarily designated by landowners across the State.

Careful and extensive deliberations during the development of the IAL statute considered the implications of takings law. Even as lands were classified as agriculture, landowners still have the right to petition Counties for redesignation. When lands are designated as IAL, this is the equivalent of a "super agriculture" zoning category and the metrics to change its status from agriculture is defined in statute and requires a higher level of scrutiny. Unlike easements and other conservation programs, the IAL statute does not provide payment for the land. Instead, it rewards landowners and farmers for investments in the land. Public funds expended towards this effort is less than pennies to the dollar used in purchase of development rights utilizing agricultural easement programs.

The first objective was to have landowners voluntarily designate their lands. In exchange landowners would not be asked to designate more than 50% of their land holdings. By voluntarily designating lands, the takings issue becomes insignificant and the State is then assured of long term agriculture on the designated lands.

Among all of the standards and criteria for designation, first and foremost is the presence of viable agricultural activity. Starting new ventures is difficult. Farms and ranches have developed their unique capacities to manage various lands. IAL is not a mapping exercise. Lands designated as agriculture without a farmer or rancher is open space. IAL is an agricultural viability initiative, providing the framework to increase Hawaii's agricultural self-sufficiency and sustainability as required in the State Constitution.

Oahu is by far the most populated island in the Hawaiian chain, and therefore very susceptible to development. Residential development continues to consume much of Oahu's prime agricultural land, so it is essential that Honolulu identify and designate its IAL while enough land remains to make any impact on Hawaii's agriculture needs. It is critical that we support those willing to farm and conserve and protect our most productive agricultural lands.

HFB commends Hartung Brothers for voluntarily designating approximately 463 acres in Kunia as IAL. The designation of these lands as IAL will help ensure that these lands remain in farming and to help with the preservation of Hawaii's agriculture industry. We support the application as written.

The Hawaii Farm Bureau Federation has supported the IAL process since its inception, and thanks Hartung Brothers for its participation in this process. We encourage the Land Use Commission to approve their petition to designate lands in Kunia as IAL.