

Blue Ivory Hawaii Corporation

P.O. BOX 893128 • MILILANI, HAWAII 96789



March 4, 2021

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

To Whom It May Concern,

I recently learned that all of 77-808 Kamehameha Highway (TMK 9-5-02-003), which Blue Ivory Hawaii just purchased last year, is slated to be designated as "Important Agricultural Lands." I am writing to object to such a classification. This land is not suitable for intensive agriculture because of the lack of water, its location, being surrounded by houses, and its topography that definitely does not make it 100% arable.

The previous owner, Sandwich Isles Communications (SIC) purchased the property in 2001 without a water allocation from the City and County of Honolulu. SIC drilled a well and installed a pump in the Wahiawa Aquifer as recommended by the State Water Commission. The water was found to be polluted and not suitable for agricultural use. The US Army Corps of Engineers installed a filtration and storage system. After the filtration system was tested in 2013, SIC then applied for a water allocation of 500,000 gallons per day to support the planned agricultural use. However, the Water Commission allocated 100,000 gallons per day. Blue Ivory Hawaii is working with the Army Corps to restart the filtration system and the State Water Commission to use the 100,000 gallons per day. However, this water allocation is not sufficient to support crops suitable for AG1 or Important Agricultural Lands.

Furthermore, this parcel is now surrounded by houses which limit farming activities that create dust and overspray of chemicals used for agriculture. SIC tried to grow crops on a small section of the property which would use less water and not require dust creating activities, in hopes of finding crops which could use less water. The lack of predictable rainfall resulted in the loss of 80 percent of its crops. SIC also tried baling the existing grass and reseeding with more suitable grass for cattle feed, but was unable to grow grass on the numerous bald spots on the property. This is not surprising since the reason this parcel was taken out of pineapple production was the lack of irrigation and unpredictable rainfall. Reseeding and growing higher yielding crops will necessitate ploughing and tilling which will produce large amounts of dust. This area is very windy; therefore, the dust and chemical overspray cannot be contained. And approximately 10% of the property is in a gulch that does not even allow for it to be productive.

Blue Ivory Hawaii plans to seek a change in classification from AG-1 to AG-2 to allow more diverse use of the property. We will continue to designate the property for agriculture use; however, we do not consent to the designation of "Important Agricultural Lands."

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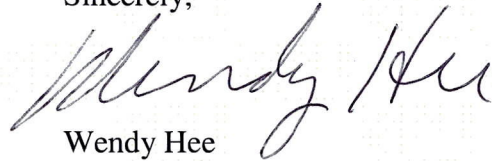
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We would also like to go on record to say that the process for the LUC to make this designation is unclear. We have been informed that the process that the LUC is currently taking is a modified "rulemaking" process that may not be proper in comparison to the typical petition that affects a private landowner's property uses. We are also unclear as to when and how property owners would be contacted about this whole process, since we did not receive any notice, and when our opportunity for input would be allowed. Thus, we are submitting this communication to ensure that we do not miss any deadlines that will preclude our ability to contest this designation.

Sincerely,

A handwritten signature in black ink, appearing to read "Wendy Hee". The signature is fluid and cursive, with the first name "Wendy" being larger and more prominent than the last name "Hee".

Wendy Hee
Vice President
Blue Ivory Hawaii