

**From:** [Sean Ginella](#)  
**To:** [DBEDT LUC](#)  
**Subject:** [EXTERNAL] Opposition to IAG  
**Date:** Wednesday, April 28, 2021 8:56:00 AM

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Aloha

I have been notified on April 12th of the intent of the LUC and the C&C of Honolulu, to place a designation of “Important Ag Lands” on our property.

Without any real meeting notices, you should have contacted land owners directly about meetings regarding this.

I am strongly opposed to the placement of said designation on my property or any of the other landowners that this IAG would be a negative impact to them for the following reasons:

Places additional, unnecessary regulations and restrictions on me as a landowner, when the Ag-1 zoning is already highly restrictive.

Imposes illegal limits and restrictions on who can occupy our farm dwelling.

Imposes unjust fines and penalties for not adhering to additional restrictions.

There are no clear rules or definitions as to what constitutes “actively farming”.

The C&C of Honolulu has no current ability to administer and enforce additional restrictions and regulations.

The placement of the IAL designation is highly arbitrary and inconsistent, State land in Wahiawa the city and county and state own sit fallow with no farmers on it like the Galbraith estate.

Our soils are poor, and do not meet the test for A or B grade ag soils, needed for the IAL designation.  
Additional layer of bureaucracy and governmental oversight and restrictions will serve to devalue our property. \*  
The IAL designation provides NO incentives or benefits to small famers/land owners, only additional burden. \*  
It is literally impossible to generate steady revenues from a small farm. Further, there is no probitability in small farms.

Revenue and/or profit tests associated with the IAL designation are impossible to meet.  
Additional governmental bureaucracy, overseeing an already highly restrictive creates a burden to landowners and regulated zoning is completely unnecessary, and places unfair burdens and restrictions on property owners.

Mahalo  
Sean Ginella