

April 24, 2021

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

TMK#85019070

To Whom It May Concern,

Aloha, we have been alerted that our parcel of land is slated to be designated as "Important Agricultural Lands" or IAL. After reading through the LUC's provided material on IAL on the provided web page City and County IAL, in its current state, we cannot support the designation of IAL for our land parcel. This is due to the lack of transparency of knowing how it will directly affect our property, current land use, and classification.

In City and County Communication 390 Part 1 page one Introduction, IAL is explained as *"a legal term that refers to a State land use designation for a select class of farm land intended to be used in the long-term for active agricultural production. In the context of the State land use system, the IAL designation is a supplemental State land use classification for an exclusive subset of high-quality farm land " "IAL designation overlays existing State and county land use classifications (i.e., state land use districts, county zoning districts) and does not change existing classifications or affect the range of current permitted land uses.""* Rather, the premise of the IAL designation is to grant landowners access to incentives and supportive measures that reduce the cost of farming, which in turn promotes the economic viability of farming and makes it possible for landowners to keep agricultural lands active, ultimately leading to the long-term preservation and protection of productive agricultural land (Chapter 205-42, HRS)." This does not clearly define how designation will directly affect us as a land owner and does not clearly define the affect of current status of classification or current land use elsewhere in the document. Also in part 6 page 76, the concern of additional land use restrictions, as well as cost of ownership and land values are concerning and have not been clearly addressed or provided to make a clear decision on the value of IAL, or its possible consequences to those who produce for self-consumption and/or do not commercially farm.

Our current land parcel TMK# 85019070 is listed at .96 acres. On page 76 of the Departement of Agriculture Apparent Anomalies in Mapping potential IAL the comments state *"38 percent (232) of 621 tax parcels proposed for IAL designation along the leeward coast from Waianae valley through Lualualei are less than two acres"* further, *"These small mapped areas appear inconsistent with the IAL policy of promoting "...the retention of important agricultural lands in blocks of contiguous, intact, and functional land units large enough to allow flexibility in agricultural production and management" (Section 205-43(1))."* We concur with the DoA. While our property is filled with 3 large producing 'ulu trees, 5 large producing mango trees, 2 large noni trees, fig, guava, mulberry, starfruit, amongst other fruit trees, a variety of flowering trees, herbs and shrubs, these are all for the personal consumption and enjoyment of neighbors, friends, and family. Our parcel is too small for production farming on any large scale. Less than ¼ acre is open field that could be used for production farming.

**IAL identification** is a step in the right direction, however, for those landowners that want and agree to the stipulations that IAL requires and incentives it provides. **IAL Designation** should only be handled on a case by case basis. To conclude, we oppose the current designation of our land parcel as IAL.

Mahalo for your time and attention,

Lucy Miranda Trust