

**From:** [Reuben Fung](#)  
**To:** [DBEDT LUC](#)  
**Cc:** [Orodenker, Daniel E](#); [Hakoda, Riley K](#); [Derrickson, Scott A](#); [Quinones, Natasha A](#)  
**Subject:** [EXTERNAL] TESTIMONY OPPOSING THE CITY AND COUNTY OF HONOLULU'S PROPOSED DESIGNATION OF TMK 5-6-006:057 (KAHUKU) AS IMPORTANT AGRICULTURAL LAND  
**Date:** Tuesday, April 27, 2021 10:43:24 AM

---

Land Use Commission  
Department of Business, Economic Development & Tourism  
State of Hawaii

**TESTIMONY OPPOSING THE CITY AND COUNTY OF HONOLULU'S PROPOSED DESIGNATION OF TMK 5-6-006:057 (KAHUKU) AS IMPORTANT AGRICULTURAL LAND**

Dear Land Use Commission Chair and Commission Members.

I am the owner of an approximately 58.4-acre parcel of land in Kahuku (TMK 5-6-006:057).

I was surprised to receive the Land Use Commission (LUC) notice dated April 12, 2021 notifying me: 1) that a portion of my land is being proposed for designation as Important Agricultural Land (IAL) by the City and County of Honolulu (City); and 2) of the LUC hearings on this matter on April 28 and 29, 2021.

I am writing to oppose the City's proposed IAL designation on my property and object to the process the City undertook in developing its proposed IAL designations.

I have owned the land since 2015, and have never received any previous notice regarding the proposed IAL designation.

Of the total 58.4-acre parcel, the City is proposing to designate two small noncontiguous areas as IAL. I find it odd that two small areas are proposed to be designated IAL, as the other areas of the parcel are not significantly different.

As I learned more about the IAL process I understand that there are eight (8) criteria to identify IAL. I understand that lands identified as IAL do not need to meet every criterion and lands meeting any of the criteria can be given initial consideration, however the designation of IAL should be determined by weighing the other criteria with each other. While the City is proposing to designate lands as IAL, I do not understand the City's methodology to identify lands that meet the IAL criteria and why my property is proposed for IAL designation.

My understanding is that the City's narrowed the identification of IAL lands to only three (3) of the eight (8) criteria. Of those three criteria, a parcel was included in the City's proposed IAL designation if it met only 1 of the 3 criteria. I believe that this resulted in a flawed process of mapping lands that should be considered for IAL designation.

I also understand that while there is not a criterion related to parcel size, one of the criteria is "lands that contribute to maintaining a critical land mass to agricultural operating productivity" and this criterion should be considered when identifying parcel sizes for IAL. I do not agree that the two small non-contiguous areas of my property would contribute to maintaining a critical land mass for agricultural productivity.

In addition, I find it odd that the City would propose IAL Designation of any of my property, as:

- Based on a study done by ALISH a majority of the property has been deemed poor for agriculture
- The property is on the top of a ridge and slopes down significantly toward the valley below
- Historically the land has never been used for agriculture, unlike the thousands of homes being developed across the Ewa Plains and in Waipio over the vast acres of farmlands

As a landowner I would like more information from the City regarding:

1. The process they undertook to propose the IAL designation of the two small non-contiguous areas of my 58.4-acre property; and
2. How the IAL designation could impact future land uses and/or approvals related to the use of the property. I have not been fully informed of what the potential implications of the IAL designation would be for my property.

Therefore, I request that the LUC send the City's proposed IAL designations back to the City and that the City provide a more thorough and informative community outreach process to inform small landowners like myself of the implications of the IAL designation. As part of this process the City should also and make refinements to their proposed IAL designations based on more than one of the IAL criteria before requesting the LUC's review and consideration.

Sincerely,  
Reuben Fung