

From: [DBEDT LUC](#)
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Cc: [Orodenker, Daniel E](#); [Derrickson, Scott A](#)
Subject: FW: [EXTERNAL] Written Testimony for May 26-27 Hearing re: IAL Recommendation of City & County of Honolulu
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From: yeeberry@aol.com <yeeberry@aol.com>
Sent: Sunday, May 23, 2021 1:35 PM
To: DBEDT LUC <dbedt.luc.web@hawaii.gov>
Subject: [EXTERNAL] Written Testimony for May 26-27 Hearing re: IAL Recommendation of City & County of Honolulu

23 May 2021

85-779 Waianae Valley Road
Waianae, Hawaii 96792

Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
235 South Beretania Street
Honolulu, Hawaii 96813

Dear Commissioners:

Our family has operated a small mango orchard on two adjoining parcels in Waianae Valley for almost 50 years. Each parcel is less than 2 acres. Both of our parcels have been designated Important Agricultural Land by the City & County of Honolulu (County) in its recommendations to the Land Use Commission (LUC). After reviewing the applicable state statutes and the testimony given during the LUC's hearings on April 28-29, we believe the County's recommendations do NOT conform with the statutes' legal, procedural and public notice requirements.

First, the County did not provide adequate public notice of its plan to designate certain parcels as IAL. As the April hearing indicated, many landowners did not receive any notice at all. As for those who received notice, the County did not provide them with adequate notice of the positive or negative impact IAL designation would have on their parcels. Absent adequate notice, landowners--particularly small farmers such as ourselves--were unaware of the importance of seeking legal counsel, participating in public meetings or filing a petition to opt out of that designation.

Second, the County has failed to meet the requirements of HSRS Sec. 205-46(2)(c). It has not offered ANY new incentives for landowners of IAL designated parcels. In fact, the County admitted during the April hearings that it would be unlikely to offer any incentives which would cost the City a single dollar in revenues. Moreover, the State Dept. Of Agriculture's offer to guarantee bank loans provides little incentive for small farmers such as ourselves. Small farmers are often unable to obtain bank loans because the income from their farms is insufficient to service the loans. Refundable tax credits are similarly worthless to small farmers since we don't build roads, processing plants, wells or dams or engage in feasibility studies. A possible tax credit for farm equipment might be helpful but the \$7,500 threshold limits its value.

We hope the Commission will review the County's recommendation from the perspective of small farmers. After all, 40% of the lands designated IAL by the County are less than 2 acres in size. Our mango orchard is typical of the small, family-run farm in Hawaii. Our trees are productive but our small scale--each of our two adjacent lots is less than 2 acres-- means we barely break even and we sometimes don't. Our father purchased and cleared the lots in 1972. He personally planted each mango tree. As a retired emeritus specialist in horticulture at the University of Hawaii, he sought to use his expertise to determine whether a person could make a reasonable living in Hawaii by growing mangoes.

The answer is "no." At least for farms of this size. My father passed away many years ago yet we continue to operate his small orchard in his memory because of all the work, professional expertise and love he put into his farm. The County's decision to include small farms in its designation does not take into account the families struggling to stay afloat. Any additional regulations will only hasten their demise, ours included. The owners of small, family farms are getting old, tired and mostly surviving on the barest of incomes. Why would the next generation choose to follow in their footsteps? Small farmers will be forced to sell their land to large, corporate agricultural entities able to turn a profit by operating on a large scale and by cultivating a single product. Hawaii will suffer by losing the large variety of agricultural produce currently grown and raised by its many small farmers. If the State and County hope to encourage agricultural sustainability and diversity in Hawaii, it is not by adding more restrictions but by adding more incentives which benefit small as well as large farmers.

Mahalo nui loa,

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