June 18, 2021

Jonathan Scheuer  
State of Hawaii Land Use Commission  
Department of Business, Economic Development & Tourism  
P.O. Box 2359  
Honolulu, HI 96814-2359

RE: Important Agricultural Lands Designation for O'ahu  
Land Use Commission Meetings on May 26-27, 2021, 09:00 a.m.

Dear Chair Scheuer and Members of the Commission:

I am in agreement with my colleague, Councilmember Kiaʻāina, that the Land Use Commission (LUC) ought to reject the City and County of Honolulu's (City) recommendations as submitted.

My Council District 1 stretches along the West Oʻahu coast from Makua to ʻĒwa Beach and encompasses numerous tracts of farmland. I too, am concerned about how Important Agricultural Lands (IAL) may adversely affect landowners. Additionally, constituents have relayed the following concerns about the IAL designation process:

- Insufficient notice regarding important dates and deadlines
- Lack of information about the appeal and opt-out process
- Unclear information regarding the impacts and consequences of an IAL designation

As pointed out by Councilmember Kiaʻāina, the testimony from landowners - especially those who hold kuleana lands and small farms - should give us pause as to whether or not the City met the “minimum” applicable requirements and the “minimum” proper procedural, legal, statutory, and public notice requirements in developing the recommendations.

I support the constitutional and statutory purpose of IAL - to protect lands capable of producing high agricultural yields - but respectfully ask the LUC to reject the City’s recommendations.

Respectfully,
Andria Tupola
Honolulu City Councilmember
District 1 ʻĒwa Beach, Kapolei, Nānākuli, Waiʻanae