

August 16, 2025

Testimony: SUPPORT Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

SUBMITTED TO:

Chairperson Sharon Hurd
Board of Agriculture and Biosecurity
1428 South King Street
Honolulu, HI 96814

SUBMITTED BY:

Dr. Heather McMillen
Kaulunani Urban and Community Forestry Program
Department of Land and Natural Resources, Division of Forestry and Wildlife
1151 Punchbowl Street STE 325
Honolulu HI 96813

Dear Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

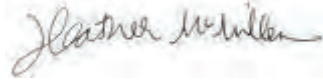
I am respectfully submitting the following testimony in **strong support** of the "Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i." This community-driven effort marks a critical point in the state's biosecurity and fight against CRB.

From conversations with those in our network of urban and community forestry professionals, we understand that community awareness and concern about CRB in Hawai'i is at an all time high. Host plants threatened by CRB include coconut, loulu, banana, and papaya – cornerstones of Hawai'i's community forests and agricultural heritage. The mission of our program is to support all of Hawai'i's communities with a focus on equity to cultivate well-being and resilience through restorative and environmental justice, planting, caring for, and growing relationships with the trees and forests where we live, work, learn and play. As such, we are called to offer support to Moloka'i community members closely connected with coconut and other hosts of CRB.

As your agency recognizes, the costs to prevent the spread and establishment of invasive species like CRB are drastically lower than long term CRB management and control. These costs are now shouldered by families, farmers, organizations, and agencies on O'ahu and Kaua'i. Maui and Hawai'i Island may follow. Further, the chemical treatments for CRB applied in maintained landscape and port settings are inappropriate for coconut and other host plants cultivated for food. Moloka'i's self-sufficiency and agricultural vitality must be led by Moloka'i

farmers and community members, who call for stronger protection against CRB through this interim rule.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Heather McMillen", written over a light blue rectangular background.

Heather McMillen
Program Coordinator
Kaulunani Urban and Community Forestry Program

‘ĀINA MOMONA

P.O. Box 367 | Ho‘olehua, HI 96729

www.kaainamomona.org

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August 21, 2025

To the Hawai‘i Board of Agriculture and Biosecurity

Subject: Regarding the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka‘i

Aloha mai kākou,

My name is Julie U‘ilani Au and I am the Director of Research, Outreach, and Education at ‘Āina Momona. ‘Āina Momona is a Native Hawaiian non-profit dedicated to achieving environmental health and social justice for the Native Hawaiian community.

I am submitting testimony on behalf of ‘Āina Momona regarding the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka‘i. We along with much of the Moloka‘i community and the larger community in Hawai‘i request that the Board of Agriculture and Biosecurity (DAB) and/or the Department of Agriculture and Biosecurity (DAB) adopt an interim rule under section 150A-9.5 Hawaii Revised Statutes (HRS) to prohibit the transportation of material that may introduce coconut rhinoceros beetle (*Oryctes rhinoceros*) (CRB) to the island of Moloka‘i.

We cannot allow the CRB to reach Moloka‘i’s shores. The impact will not just be to coconut as a cultural resource, but also as a food resource. The coconut rhinoceros beetle (CRB) has impacted our precious niu (coconut) throughout Hawai‘i. Niu is both a food resource as well as a significant cultural resource in Hawai‘i. Niu is a valuable food resource to our people. Its destruction from CRB will impact our ability to feed ourselves. There is a very real risk that the CRB will reach Moloka‘i without prohibition of the transportation of infested materials to the island.

One area of major concern is the Kapuāiwa coconut grove on Moloka‘i. In the 1860s, 1,000 niu trees were planted for each of King Kapuāiwa's warriors. (Kamehameha V.) This is one of the last royal niu groves and is filled with hundreds of trees and some freshwater springs. Niu trees usually live for 60 to 80 years. More than half of the grove has been replanted at least three times, but some of the original trees are still standing.

We ask for diligence in the prevention of importing destruction to Moloka‘i. We must act now before we are forced to react later. Mahalo for your time and your kōkua with protecting Hawai‘i’s precious resources.

Me ka ha‘aha‘a,

Julie U‘ilani Au

Director of Research, Outreach, and Education, ‘Āina Momona

[EXTERNAL] Coconut Rhinoceros Beetle / Molokai

From barbara nickou <baznickou@gmail.com>

Date Mon 8/11/2025 4:19 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

My name is Barbara Nickou. I've been a Molokai Resident since 1976.

I fully support the Petition to Prohibit the Transportation of all materials that may introduce the Coconut Rhinoceros Beetle to the island of Molokai.

We already have numerous destructive invasive species on Molokai including the white fly that have damaged, killed and negatively impacted many species of trees including Coconut and Lauhala.

I support the ongoing work being done on Molokai by Kunani and Ipo Nihipali in their propagation of multiple varieties of Coconut trees on Molokai.

Please prioritize assistance with protecting Molokai Coconut trees by prohibiting any materials that could potentially contain CRB and CRB Larvae.

Mahalo,

Barbara Nickou
Waialua Valley,
Molokai, Hawaii

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Beppie Shapiro <beppie@hawaii.edu>

Date Thu 8/21/2025 4:56 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha to Chair Hurd and members of the Board:

My name is Beppie Shapiro, resident of Kaimuki Oahu. I have watched with horror as coconut palms in various areas are damaged and then wiped out by the CRB, whose initials have become infamous. I am incredulous that we will, it seem, lose that iconic species entirely. No more palm leaf woven baskets; no more coconut shell dishes, decor, or jewelry. No more Hawaiian coconut milk or cream for luau, coconut cream pie, etc. Then I'm sure each of you reacted with the same dismay as I did when we learned these destructive beetles are now coming for a wide range of other species dear to gardeners, farmers, and landscapers. What has Hawaii done to let all this happen as beetles have invaded island after island for lack of strict policies and enforcement to prevent transport of the materials in which beetles, larvae etc hide?

Finally one last wake-up call lands before you. Will you save the last uninfested island, Moloka'i? It is in your hands. As a two-generation resident of Hawaii I BEG you to act quickly and decisively.

Please, please pass the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. Then work to ensure rigorous enforcement at all ports of entry. For years I would buy orchid plants on the Big Island, go to the Dept of Agriculture to have the plant and supporting material carefully inspected and the plant tagged to show it could go on an airplane. Now we need to enforce the same inconvenient but essential regimen for CRB-related materials. Don't let this opportunity to protect valuable plants pass!

Thank you for your attention.

Beppie Shapiro

4118 Pakolu Pl, Honolulu 96816 (anxious and despairing owner of 5 lovely tall mature coconut palms)

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Bobbie Foster <hawaiiobbie@gmail.com>

Date Fri 8/22/2025 7:24 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Roberta Foster and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

As I drive around Oahu, i regularly see the devastation that CRB is having on palms and many other plants. So sad and frustrating.

As a volunteer helping fight the Little Fire Ant problem, I can see how prevention is key. Once a pest arrives on an island, it is so hard to control and win the battle.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Roberta Foster, Oahu resident

Stay Calm, Safe, Healthy and Sane

Bobbie Foster
hawaiiobbie@gmail.com

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Chuck Chimera <cgchimera@gmail.com>

Date Thu 8/21/2025 4:09 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

I am testifying from Honoka'a in **strong support** of the Interim Rule to prohibit the transportation of materials that could introduce the Coconut Rhinoceros Beetle (CRB) to Moloka'i. Prevention is the only effective and affordable strategy, and Moloka'i still has a chance to avoid the devastation my island has faced.

In my currently LFA-free neighborhood, we live with the constant threat of little fire ants spreading from other parts of Hawai'i Island. We know how quickly one infested load of mulch or a single nursery plant can change an island forever. That reality makes me deeply understand the urgency Moloka'i residents feel today.

As a native plant enthusiast, I am also alarmed by the spread of CRB across Hawai'i Island. It endangers not only our cherished niu but also our irreplaceable native loulu palms. While staff from the Department of Agriculture and Biosecurity, Big Island Invasive Species Committee, Hawai'i Invasive Species Council, Department of Transportation, and others are working heroically to contain outbreaks, the beetle's advance is terrifying—we cannot let this scenario repeat on Moloka'i.

I am inspired by the grassroots efforts of 'Anakala Kunani Nihipali, 'Anakē Ipo Nihipali, and the Niu Now Moloka'i project. Their leadership is exactly what strong biosecurity requires, and they are asking for protection before it is too late.

The establishment of CRB on Moloka'i would be a devastating loss for all of Hawai'i. With limited resources to fight an invasion, prevention is the only moral and practical choice.

I respectfully urge you to pass this interim rule. Do for Moloka'i what we wish had been done for us sooner—protect the 'āina while we still can.

Mahalo nui for your action.

Chuck Chimera

Honoka'a, Hawaii

Emilio Macalalad
Molokai High School
2140 Farrington Ave/PO Box 158
Hoolehua, HI 96729

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of
Molokai**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the **Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the Coconut Rhinoceros Beetle
to the Island of Molokai.**

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaii on the Island of Oahu in 2013. The Hawaii Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauai and has been detected on Hawaii Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokai. Molokai is a small and interconnected island. If CRB arrives on Molokai, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokai for a 1-year period under an interim rule is the emergency measure needed now.

Our school has been working with Niu Now from Oahu to help prevent the spread of CRB on Molokai. They have helped to educate kumu from various schools on Molokai to develop unit plans and lessons for keiki in order to educate, propagate, and prevent CRB from coming to Molokai.

I/We urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible. Thank you for the opportunity to provide this testimony and for your efforts to help protect Molokai and other islands of the State from the impacts of CRB.

Aloha,

Emilio Macalalad
Science/Agriculture Teacher

Kyle Franks
kefranks@hawaii.edu

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of
Molokai**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the **Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the Coconut Rhinoceros Beetle
to the Island of Molokai.**

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaii on the Island of Oahu in 2013. The Hawaii Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauai and has been detected on Hawaii Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokai. Molokai is a small and interconnected island. If CRB arrives on Molokai, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokai for a 1-year period under an interim rule is the emergency measure needed now.

[Add your personal or organization's reasons for keeping CRB out of Molokai and your relationship with niu, native palms, etc.]

I urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible.

I hope this letter helps to provide understanding of the urgency of this issue. All of the community will thank you for your efforts to help protect Molokai and other islands of the State from the impacts of CRB.

Aloha,

Kyle Franks

[EXTERNAL] Support for the Interim Rule to Prohibit the Transportation of Material to Molokai

From Danielle Frohlich <dsfrohlich@gmail.com>

Date Thu 8/21/2025 5:50 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Danielle Frohlich, and I'm an invasive species specialist here in Hawaii. I am writing in strong support of the Interim Rule to stop the transport of materials that could introduce the coconut rhinoceros beetle to Moloka'i.

Seeing how easily this pest has spread through our islands, it is imperative to give Molokai (the last holdout free of CRB) the preventative help it needs to keep this pest off the island, which is home to many unusual traditional cultivars of niu.

I respectfully urge you to support this interim rule- mahalo for your consideration.

Danielle Frohlich

[EXTERNAL] Testimony In support of prohibiting material that may introduce Coconut Beetle to the island of Molokai

From Jane Goodsill <janegoodsill@icloud.com>

Date Wed 8/13/2025 1:01 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Hawai'i Board of Agriculture and Biosecurity,

I am in support of the **"Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai."**

Having seen what the CRB has done to coconut trees on `Oahu, It seems imperative to prevent this devastation on the island of Molokai.

Signed,

Jane Marshall Goodsill
`Oahu, Hawai'i

[EXTERNAL] Testimony in Strong Support of the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i

From Kanoelani Davis <molokainuiahina@gmail.com>

Date Sun 8/17/2025 2:25 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Board of Agriculture and Biosecurity

August 26, 2025

9:00 a.m. – Plant Quarantine Branch

1849 Auiki Street

Honolulu, Hawai'i 96819

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

Mahalo for the opportunity to testify. My name is Kanoelani Davis, and I am a resident of Molokai, cultural practitioner, community member, organizer, Kumu hula. I am writing in strong support of the petition for interim rulemaking to prohibit the transportation of material that may introduce the Coconut Rhinoceros Beetle (CRB) to the island of Molokai.

As the petition notes, CRB was first detected on O'ahu in 2013 and, despite a decade of prevention efforts, has now spread to Kaua'i and Hawai'i Island. Molokai remains the only main inhabited island not yet impacted by CRB, but without immediate intervention, this will not remain the case.

Molokai is a small, tightly interwoven island where agriculture, cultural practice, and community wellbeing are inseparable. If CRB arrives here, it will devastate not only our niu (coconut) and native palms, but also the foundation of our subsistence systems, cultural traditions, and local economy. On Molokai, we still rely heavily on 'āina practices, growing our own food, maintaining lo'i and mala, and using coconut and native palms in ceremony, hula, medicine, and daily life. Losing these resources would cause irreparable harm to our cultural identity, food security, and way of life.

Prohibiting the movement of high-risk materials such as potted plants, mulch, compost, and green waste for at least one year under an interim rule is not simply a

precaution, it is an urgent necessity. It is our kuleana to act before this beetle arrives, because once here, the damage cannot be undone.

I respectfully urge the Board to direct the Department of Agriculture and Biosecurity to convene the Advisory Committee on Plants and Animals to consider and approve the interim rule as quickly as possible. By taking this action, you are not only protecting Molokai, but also upholding the health of Hawai‘i as a whole.

Mahalo for your attention and for your commitment to safeguarding Molokai and our lāhui from the impacts of the Coconut Rhinoceros Beetle.

Me ka ha‘aha‘a,
Na Kanoelani Davis

‘Ike 'ia no ka loea i ke kuahu

An expert it recognized by the altar he builds. “Be the change you want to see in the world”

- *Olelo No'eau*

[EXTERNAL] Testimony in Support of the Interim Rule – CRB

From Kelly Rawlins <kelly.rawlins@k12.hi.us>

Date Mon 8/11/2025 9:12 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Testimony in Support of the Interim Rule – CRB

Aloha Chair and Members of the Board,

My name is Kelly Rawlins, and I live on Molokai. I support the petition to approve the Interim Rule to prohibit the transportation of material that may introduce the Coconut Rhinoceros Beetle to the Island of Molokai.

Molokai's environment, agriculture, and cultural heritage depend on protecting our coconut trees and native species. The CRB is a destructive pest, and preventing its introduction is far easier and less costly than trying to remove it after it arrives. Passing this interim rule is an important step to safeguard Molokai for our keiki and future generations.

Mahalo for your consideration.

Sincerely,

Kelly Rawlins

Molokai High School Agriculture Teacher

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[EXTERNAL] Testimony – Interim Rule to Prohibit the Transportation of Material That May Introduce the CRB to the Island of Moloka'i

From Kunani Nihipali <huliau2014@gmail.com>

Date Tue 8/19/2025 7:54 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha.

Here is my testimony from Kunani a me Ipo Nihipali

Niu Now & Forever

Integrating 'Ike Niu-Hawaiian Coconut Knowledge, Food Security & Economic Sovereignty

Pule: *'E aloha Mai'*

Our *pule* today, is a loving prayer for this *hui*, to restore and reunite, collectively, our *'aina, ka Po'e*, our land, people and for the continuity of *niu*.

Kupu ka niu, Kupu ke Kanaka...When niu is planted, humanity grows.

Aloha ke Akua, na 'Aumakua, na Kupuna, na maka'ainana, a me na ho'aloa o Hawai'i.

Aloha & mahalo for allowing us to speak here today in behalf of our *'ike Kupuna*, past and present: To Director Sharon Hurd of the Department of Agriculture & Biosecurity, its Advisory Committee; our Molokai Legislative Representatives Senator Lynn DeCoite, House Representative Mihana Poepoe, other representatives of our legislature of all Islands, and friends.

We want to acknowledge and *mahalo* the 'founders' and 'core' members of our **Niu Now** movement, whose *kilokilo*, foresight, *hana nui*, hard work and *kako'o*, support of *'ike niu*, coconut knowledge have made our **Molokai Niu Now** a success: Dr. Manulani Meyer, *Kumu Niu Ai'a*, our teacher and Sri Lankan Brother, Indrajit Gunasekara, our *Alakai*, leaders Kekaula Hanohano & Jessie Mikasobe-Pilialoha Keali'iholomoku, *Niunates o ka pae 'aina o Hawai'i*, farmers, community supporters here to share their *mana'o*, expertise and voices today on this important matter: the protection, preservation & perpetuation of niu, our *'Tree of Life'*.

In recorded history, our lives depended on niu, our *'tree of life'*. Niu is our life support from birth to death. It connects us from childbirth to adulthood with and on our ancestral lands. Niu ensures our well-being with its nutritional and traditional medicinal properties, as a symbol of abundance, unity, and fertility. Niu is still a sacred plant of our *nohona*, lifestyle, island diet, sustenance, shelter, material and ceremonial needs, but most our food security. Thus, niu's subsistence and sustainability is more than just landscaping or aesthetic purposes. *Kumu la'au niu* now is planted everywhere: for developments, hotels, parks, schools, landscaping or just for nostalgic ambience. The irony is: *dey wen hemo da lahos, da olos! Cut 'em off! NO NUTS! No coconuts!* Our *tree of life* and food source was reduced to a *liability* we can *'make'* from, in modern Hawai'i.

Hawai'i, the invasive capital of the world has **another** more devastating threat to our Niu Now, the **introduced CRB, the coconut rhinoceros beetle**. Molokai is a small island. If the CRB is detected anywhere on Molokai, it could spread rapidly impacting native and endemic palm species like the rare *loulou* (*Pritchardia hilebrandii*), and other plants and crops of agricultural, ecological, cultural and economic value. **Preventing CRB from reaching Molokai constitutes an emergency situation**. The CRB is well established on Oahu, widespread on Kauai, spreading on Hawaii Island, and has been detected on Lanai. If CRB is detected on Molokai, the chemical treatment proposed will significantly impact the usability of our coconut trees, imperil native and endemic palms, and interfere with important traditional and cultural practices.

We've identified two ancient *uluniu wahipana*, sacred coconut groves with genetic and generational niu on Molokai: one on the east side, the *Ulu niu o Mapulehu*, and the infamous *Ulu niu o Kapu'aiwa* at *Kalamaula*. Planted in the mid 1860s, their purpose was/is for the maintaining our health and *mana* of our Molokai Island Kanaka community. **Prince Lot Kapu'aiwa, Kamehameha V** in 1866, planted over a thousand trees to represent that number of warriors. Thus, the CRB is not only cause of **botanical ecological grief**, but a form of introduced **ethnocide** that **would be an erasure of our royal legacy of Hawaiian 'ike niu**, ancestral knowledge of coconut! It is all our sacred kuleana to *malama na uluniu*. It the highest calling for us Kanaka Maoli Hawai'i, literally rooted, generationally in our heritage-based knowledge society. We must continue to protect, maintain, preserve, perpetuate and rejuvenate our Niu Now and Forever. *Aloha 'Aina Malama 'Aina*.

Whose *kuleana* is it to protect us from this desecration? We know the Federal government is complicit, and that *kuleana* and *kaumaha*, grief has been left with its agent, the State of Hawai'i.

As are our benefactors, our representatives, our servants of these *wahipana*, sacred and public Trusts. It is **your** *kuleana* to hear the voices of our ancestors, **we, the Beneficiaries** of our Kupuna. Your *kako'o*, support is to *kokua*, facilitate all the proper measures to address this urgent emergency to protect our Molokai Island. It is not enuf to prevent the potential loss and devastation by the CRB to our environment, our ecological and our food economic security, but also of our culture, our lifestyle, our genetic wealth of our uluniu, **generationally**. *E 'olu'olu*, please, support this Petition we have filed; ensure that we are here not asking in vain, and that when we leave here we can be assured that tomorrow's generations are protected and our sacrifices today, not fall to the wayside and cracks. The ask is easier than the task. *Minamina*, shame, that we have **to ask** for the tools, the economic resources to combat this *hewa*, this evil fault that's reached every shore of every Island since 2013. We've seen and felt the *'eha*, the pain and depression of our Ohana on **all** infected Islands by this CRB. *A'ole pono...that's not right!*

There is no acceptable CRB treatment or prevention. Potted plants and other CRB **host material** are only visually inspected at the island of export. Molokai does not have a DAB employee on-island to assist with visual inspections of arriving materials. Even if there was a DAB employee assigned to Molokai, it would not be sufficient to prevent CRB from reaching the Island. In light of this dire situation, we believe the threat and likelihood of the spread of CRB to Molokai creates a dangerous situation to the historic, public and ecological health and safety of our flora & fauna of Molokai. We need to prevent the CRB on Molokai and request this Advisory Committee to consider this necessary proposed interim rule that helps address this emergency situation. We encourage you to authorize the **signing of this proposed interim rule, so that it may take effect at the earliest possible date.** We must **prevent CRB from reaching Molokai and consider this urgent enough to constitute an emergency declaration.** **Niu Now** is about Reconciliation. It is a **reminder** of our inter-dependency between our people, our 'aina, our ancestors and our future generations that we **must never again lose site of:** our *Tree of Life*. *Ho'omakaukau*, let's *ho'ala hou* the legacy of the **Niu Now** and **FOREVER!**

"Mau ka pono o ka niu, mau ke 'ea o ka 'aina. When niu is planted, we have our freedom of our land.

Mahalo

Kunani a me Ipo Nihipali

Niu Now Molokai Ho'olehua Molokai Beneficiaries/Homesteaders

Sent from my iPhone

[EXTERNAL] Testimony – Interim Rule to Prohibit the Transportation of Material That May Introduce the CRB to the Island of Molokaʻi

From Kuulei Alameida <kuulei1991@gmail.com>

Date Sat 8/16/2025 8:06 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

 1 attachment (165 KB)

Testimony CRB Interim Rule - Kuulei Alameida.pdf;

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Kuulei Alameida, and I live on Molokaʻi (PO Box 125, Maunaloa, HI 96770). I am writing to support the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Molokaʻi.

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaiʻi on the Island of Oʻahu in 2013. The Hawaiʻi Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauaʻi and has been detected on Hawaiʻi Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokaʻi. Molokaʻi is a small and interconnected island. If CRB arrives on Molokaʻi, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokaʻi for a 1-year period under an interim rule is the emergency measure needed now.

This issue matters to me personally because I live on Molokaʻi and do not want the CRB to ravage our ecosystem or kill off our essential food sources. Our community relies on healthy niu and other plants for cultural, environmental, and food sustainability. Protecting Molokaʻi from CRB is critical to safeguarding our way of life.

I urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible.

Thank you for the opportunity to provide this testimony and for your efforts to help protect Molokaʻi and other islands of the State from the impacts of CRB.

Mahalo,
Kuulei Alameida

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Malcolm Mackey <ozymandias35@hotmail.com>

Date Thu 8/21/2025 8:00 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Malcolm Mackey, a resident of Ualapue, Molokai, and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo for considering my testimony,
Malcolm Mackey

[EXTERNAL] Interim Molokai Rule to Prevent CRB

From Malia Nolan <malianolan@gmail.com>

Date Sat 8/16/2025 6:38 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha,

I am resident and wife of a farmer on Molokai and am writing to support the "Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai".

As the only island without coconut Rhinoceros Beetle (yet), and the island with the least amount of resources to do anything about it if and when it comes, its imperative that the state help us regulate this.

We have had multiple VERY unfortunate incidences of non-residents with vacation homes, who do not understand CRB and are looking only for the cheapest deal, shipping in literal container loads of mulch from Oahu to the West End, and that is literally a ticking time bomb for invasive species. I don't know how this was approved but it has already happened multiple times in the last 6 months. With CRB eggs being the size of a grain of rice, no one can actually sift through that much mulch.

We also have our only functioning nursery on-island selling entirely plants from Big Island, with minimal inspection. They have inadvertently brought in several invasive species we are now dealing with. We need inspectors who take their jobs seriously and are PROUD of the good work they do. Who understand how important their role is. I worked in New Zealand once and their inspectors were so strict and professional! This is what we need in Hawaii too. We are an even more vulnerable ecosystem than New Zealand.

Molokai could and SHOULD be the plant & mulch export capital of Hawaii, as we are the only island free of many pests. My husband has been teaching classes at the community college to train future greenhouse and nursery employees, but without funding support to get these initiatives off the ground they won't happen.

It could be an excellent job and economic opportunity for locals on-island, for Molokai provide stable jobs, and simultaneously help all of Hawaii Nei by creating a market where plants, mulch and soil are made on an island with far fewer invasive pests so that we are not spreading invasives across the state.

It is really a sensible solution!

Please put whatever regulations are needed onto Molokai imports to prevent CRB from entering our island. We love our 'aina and want to protect it. We need the state's help.

Mahalo for your attention to this.

Malia

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Mariko Whitenack <marikowhitenack@gmail.com>

Date Fri 8/22/2025 4:33 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Mariko Whitenack and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) is having on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, mai'a, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal. Mahalo nui for your consideration of this matter.

[EXTERNAL] Testimony Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Mary Johnson <wrcinashfield@yahoo.com>

Date Sun 8/17/2025 1:30 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Testimony in Support of the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i

For: August 26, 2025 Board of Agriculture and Biosecurity Meeting

From: Mary Johnson, Farmer technical Service Provider with Five Years of Farming Assistance Work in Maui County and Hawai'i Island, and currently supporting farmers across Molokai.

Aloha mai kākou e Chair, Director Sharon Hurd, members of the Department of Agriculture & Biosecurity Advisory Committee, Senator DeCoite, Representative Poepoe, and honored community members. Mahalo for the opportunity to share my mana'o today.

For the past five years, I have worked directly with farmers across Maui County and Hawai'i Island to strengthen food security, restore degraded lands, and support the next generation of local growers. Through this work, I have come to deeply appreciate how intertwined Hawai'i's agriculture is with culture, economy, and the resilience of communities. At every level—whether training youth in agroforestry, supporting kūpuna farmers, or helping women establish cooperative food ventures—the vitality of Hawai'i's farming future rests on protecting our island ecosystems from invasive threats.

The coconut rhinoceros beetle (CRB) represents one of the most serious agricultural and cultural dangers facing Hawai'i today. On O'ahu, I have heard farmers worry about how infestations have devastated coconut groves and forced farmers to divert already scarce resources toward emergency response instead of investing in long-term food production. On Hawai'i Island, farmers I've work with express grave fear that treasured niu, loulou, and other palm species will be lost—not only as food and materials, but as cultural foundations. They remind me: "We cannot rebuild food security if our tree of life is under attack."

On Moloka'i, community members know that uluniu at Kalama'ula and Mapulehu are irreplaceable living legacies—royal plantings that continue to nourish the island both physically and spiritually. If CRB were to arrive there, the damage would not only be agricultural but cultural, erasing ancestral knowledge embedded in the niu. In my work, I support indigenous leaders fighting for cultural survival all around the World. This issue is of paramount importance. Protecting these groves is protecting the food sovereignty and native Hawaiian identity still alive on Moloka'i and critical for the future of all of Hawai'i.

From firsthand experience, I know that prevention is the only truly effective strategy with aggressive invasive pests with no natural predators. The plague of deer on Molokai serves as a living example.

Once CRB arrives, there is no effective treatment that restores what is lost. Current inspection protocols are not enough to keep Moloka'i safe. Without interim rulemaking to restrict and regulate the transportation of potted plants, mulch, green waste, and other host material, Moloka'i remains vulnerable. This is not simply a regulatory matter—it is a food security emergency and a cultural survival issue.

As a citizen who has witnessed the struggle of farmers on multiple islands, and across indigenous communities around the world, I respectfully urge the Advisory Committee and the Board of Agriculture to approve this interim rule and act swiftly to shield Moloka'i from CRB. The cost of inaction will be measured not only in dollars lost but in the erosion of cultural continuity, food security, and the well-being of future generations.

Kupu ka niu, kupu ke kanaka. When niu is planted, humanity grows. Let us act today so that humanity—and our niu—will continue to thrive for the generations to come.

Mahalo nui loa,
Mary Johnson

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Nanea Lo <naneaclo@gmail.com>

Date Fri 8/22/2025 9:34 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Hello Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Nanea Lo and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

me ke aloha 'āina,

--

Nanea Lo (*she/they/'o ia*) | Micro-influencer

Executive Committee | [Sierra Club of Hawai'i](#)

Board Member | [Circular Fashion Hawai'i](#)

Granter | [Hawai'i People's Fund](#)

Pod | [Naughty + Native](#)

(808)444-1229

[LinkedIn](#)

"Some people say that Hawai'i will be a better place when Hawaiians no longer stand in the way of progress. But even these people must know that at this point, this will no longer be Hawai'i." - Jonathan Kay Kamakawiwo'ole Osorio. The Value of Hawai'i

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Pete Wilson <perhansahi@gmail.com>

Date Thu 8/21/2025 3:29 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Bo Breda and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue.

Bo Breda
13.927 Kahuakai Street
Pahoa HI96778

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Pete Wilson <perhansahi@gmail.com>

Date Thu 8/21/2025 3:20 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Peter Wilson and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue.

--

Peter Wilson
13-927 Kahukai Street
Pahoa HI 96778
808-557-8108

Kunani Nihipali
Ipo Nihipali
Lot B4 Maunaloa Highway
Hoolehua, Hi. 96729
(808) 349-6407
huliau2014@gmail.com

July 29, 2025

Chairperson Sharon Hurd
Board of Agriculture and Biosecurity
1428 South King Street
Honolulu, Hawaii 96814

**Petition for Interim Rulemaking to Prohibit the Transportation of Material That May
Introduce the Coconut Rhinoceros Beetle to the Island of Molokai**

Dear Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

This petition is made pursuant to section 4-1-23 Hawaii Administrative Rules (HAR) to request the Board of Agriculture and Biosecurity (BAB) and/or the Department of Agriculture and Biosecurity (DAB) adopt an interim rule under section 150A-9.5 Hawaii Revised Statutes (HRS) to prohibit the transportation of material that may introduce coconut rhinoceros beetle (*Oryctes rhinoceros*) (CRB) to the Island of Molokai.

CRB was first detected in Hawaii on the Island of Oahu in 2013.¹ Since that time, the Hawaii Department of Agriculture (referred to as DAB in this petition) and its partners worked to prevent the spread of CRB. Ultimately, those efforts were not successful, and CRB is now established and widespread on Oahu.² For the first 10 years, DAB was able to prevent the movement of CRB to other islands of the State. However, in 2023, CRB was detected on the Island of Kauai, where it is now widespread.³

In an attempt to contain CRB, DAB adopted interim rules under section 150A-9.5 HRS in June 2022, October 2023, and October 2024.⁴ These interim rules require a DAB permit for the movement of CRB host material, including palm plants in the genera *Cocos*, *Livistona*, *Phoenix*,

¹ <https://dab.hawaii.gov/pi/files/2013/01/npa-CRB-5-1-14.pdf>

² <https://www.civilbeat.org/2025/02/ravenous-beetles-go-urban-preying-on-honolulus-iconic-coconut-palms/>

³ <https://dab.hawaii.gov/blog/main/nr23-11crbonkauai/>

⁴ §4-23.1-1 HAR; <https://dab.hawaii.gov/wp-content/uploads/2018/05/CRB-Interim-Rule-10-11-2024.pdf>

Pritchardia, *Roystonea*, and *Washingtonia*; decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks from Oahu to other areas of the State. Unfortunately, during the period that these interim rules have been in effect, CRB has become widespread on the Island of Kauai and has been detected in two areas on the Island of Hawaii and in potted plants that are not covered by the interim rules on the Island of Lanai. Further, DAB's current CRB interim rule is set to expire on October 10, 2025.

In light of this dire situation, we believe the threat and likelihood of the spread of CRB to Molokai creates a situation dangerous to the public health and safety or to the ecological health of flora or fauna present in the State, on the Island of Molokai, which is so immediate in nature as to constitute an emergency. This petition respectfully requests BAB and/or DAB: convene a meeting of the Advisory Committee on Plants and Animals to consider an interim rule as proposed in Attachment A to protect Molokai from the spread of CRB; and if the Advisory Committee determines the proposed interim rule is necessary to address an emergency situation that the Chairperson of BAB be authorized to sign the proposed interim rule so that it may take effect at the earliest possible date.

Alternatively, if the BAB and/or DAB determines that this petition may not initiate an interim rule than we request BAB interpret this petition to request BAB and/or DAB initiate emergency rulemaking under sections 91-3(b) HRS and 4-1-30 HAR, and find that an imminent peril to the public health, safety, or morals, to livestock and poultry health, or to natural resources requires adoption of the emergency rule that includes the substance of the restrictions set out in Attachment A, upon less than thirty days' notice of hearing, and state in writing the reasons for such finding.

Statement of petitioner's interest in the subject matter of the proposed interim rule

We are residents of Hoolehua, Molokai. We farm sustenance and sustainable foods, including coconut on Molokai. Our agricultural interests include a uluniu (coconut grove). In addition to producing agricultural products, we work to restore the culture of ike niu on Molokai. If CRB were to be detected on Molokai, crown and injection pesticide treatments would cause substantial losses to the uluniu and severely impact our efforts to restore traditional practices and uses of coconut trees. If CRB were to become established on Molokai, we would lose the production of the uluniu and, as we are now seeing on Oahu, the trees themselves.

In addition to our direct interests in protecting the uluniu we created on Molokai, we have helped organize, and participated in, many community events, are active community members and strong supporters of Native Hawaiian rights and culture, and work to establish food and water security for Molokai and reestablish a loving relationship with niu, the tree of life.

For these reasons, we have substantial interest, including economic and cultural interests, in seeking the adoption of this interim rule to prevent the spread of CRB to Molokai.

Statement of reasons in support of the proposed interim rule

In Hawaii, counties and other units of local government are preempted from banning or regulating the movement of material to prevent the introduction of a pest or invasive species.⁵ That authority rests solely with DAB. This leaves Maui County and the Island of Molokai unable to require the quarantine or treatment of plants, soil, and other CRB host material moved to Molokai or to otherwise prevent CRB from reaching Molokai.

Further, at this time, there is no acceptable CRB treatment for potted plants and some other CRB host material. For much of the material that can move CRB, this leaves visual inspection at the island of export as the only prevention tool. Molokai does not have a DAB employee on-island to assist with visual inspections of arriving materials. Even if a DAB employee was assigned to Molokai, it would not be sufficient to prevent CRB from reaching the Island. Visual inspections and other requirements failed to prevent CRB from becoming established on the Island of Kauai or from reaching and spreading on the Island of Hawaii. The recent detection of CRB on the Island of Lanai in potted plants that are not typically considered hosts of CRB and that are not covered by the October 2024 CRB Interim Rule is of extreme concern. As DAB is aware, other pests such as cocoi frog, geckos, invasive plants such as miconia and fireweed, and other invasive species (including a gopher snake!) have been detected on Molokai moving in shipments of potted plants, large trees, and bags of soil, some of which had DAB inspection stickers.

Our coconut trees are used for subsistence and sustainable agriculture, including as part of our traditional Hawaiian cultural practices. These trees are not just for landscaping or aesthetic purposes. Molokai is a small island, approximately 260 square miles in size. If CRB is detected anywhere on Molokai, it could spread rapidly across the island, impacting agricultural interests. CRB establishment on Molokai would impact native and endemic palm species, including the rare loulu palm (*Pritchardia hillebrandii*), and other plants and crops of agricultural, ecological, and cultural value. Further, the people of Molokai, including ourselves, utilize coconut trees as an integral part of our economic and cultural life. Preventing CRB from reaching Molokai is an emergency situation, with CRB being established on Oahu, widespread on Kauai, spreading on Hawaii Island, and detected on Lanai. If CRB is detected on Molokai, the treatment of coconut trees will significantly impact the usability of our coconut trees and that of other coconut trees on Molokai, imperil native and endemic palms, and potentially interfere with important traditional and cultural practices.

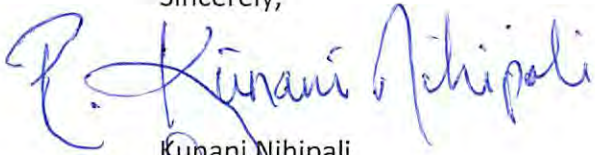
⁵ See *Atay v. Cty. of Maui*, 842 F.3d 688, 709 (9th Cir. 2016); *Syngenta Seeds, Inc. v. Cty. of Kauai*, 664 F. App'x 669, 673 (9th Cir. 2016); and *Hawaii Floriculture & Nursery Ass'n v. Cty. of Hawaii*, No. CIV. 14-00267 BMK, 2014 WL 6685817, (D. Haw. Nov. 26, 2014), *aff'd sub nom. Hawaii'i Papaya Indus. Ass'n v. Cty. of Hawaii*, 666 F. App'x 631 (9th Cir. 2016)

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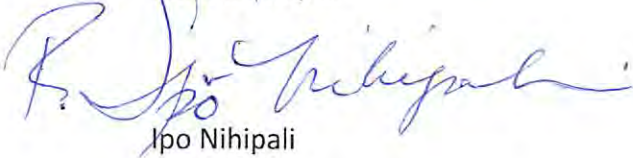
We respectfully request that BAB consider this petition at its August 2025 meeting and that BAB inform the petitioners of its decision on this petition within 30 days, as required by section 4-1-23(c) HAR. Further, we respectfully request that DAB utilize any authorities available to protect Molokai from CRB and other high-priority pests as quickly as possible and, if necessary, waive any filing or timing requirements not met by this petition, with good cause being shown as required by section 4-1-11 HAR, as the need to prevent CRB from reaching Molokai constitutes an emergency.

Thank you for your consideration of this petition and for all your efforts to protect Hawaii and the Island of Molokai from high priority pests, particularly CRB. Please contact us if we may provide any further information regarding this petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kunani Nihipali".

Kunani Nihipali

A handwritten signature in blue ink, appearing to read "Ipo Nihipali".

Ipo Nihipali

Attachment A - Draft Proposed Interim Rule

Attachment A

Draft Proposed Interim Rule

To Prohibit the Transportation of Plants, Soil, Gravel, and other CRB Host Material including Decomposing Plant Material Such as Compost, Wood or Tree Chips, and Mulch, Plant Propagation Media; and Other Items Comprised of Decomposing Organic Plant Material Such as Landscaping Material or Erosion Control Socks, to Prevent the Movement of **Coconut Rhinoceros Beetle**, *Oryctes rhinoceros*, to the Island of Molokai from Other Areas of the State

Under authorization granted in Section 150A-9.5, Hawaii Revised Statutes (HRS), the Hawaii Department of Agriculture and Biosecurity (Department) hereby establishes this interim rule to impose a quarantine on the movement of plants, soil, gravel, and other **coconut rhinoceros beetle** (CRB) host material, including decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks, to prevent the spread of the CRB, *Oryctes rhinoceros*, to the Island of Molokai, an island where CRB has not been detected.

The interim rule is needed to prevent the further spread of CRB to the Island of Molokai from other areas of the State. The residents of Molokai utilize the coconut tree (*Cocos nucifera*) and other palm species for subsistence, local food production, and cultural practices and the need to protect these natural resources on Molokai from the imminent peril of CRB constitutes an emergency. Further, CRB establishment on Molokai would impact native and endemic palm species, including the rare loulu palm (*Pritchardia hillebrandii*). CRB has been detected moving between islands of the State on potted plants that are not typically considered hosts of adult CRB and has been detected moving interisland despite the CRB interim rules issued by the Department that took effect on October 4, 2023 and October 11, 2024, that restrict the movement of CRB host material and palm plants in the genera *Cocos*, *Livistona*, *Phoenix*, *Pritchardia*, *Roystonea*, and *Washingtonia*; decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks, from the Island of Oahu to other areas of the State.

This interim rule prohibits the movement of potted or bare root plants and other CRB host material, which:

- (A) Includes decaying plant material, mulch, trimmings, fruit and vegetative scraps, wood, stumps, compost, plant propagation media in live planting, commercially bagged plant propagation media or landscaping materials that have been staged or stored in any area of the State, soil, and gravel; and
- (B) Does not include:

- (i) Plant products intended for consumption, such as coconuts, fruits, nuts, edible leaves, leaves used for cooking, and spices;
- (ii) Plant products preserved from decay by treatment or use, such as lumber, woven hats, dried and painted coconuts, wooden posts, wood carvings, and firewood;
- (iii) Seeds for planting,
- (iv) Cut flowers and foliage for decoration, such as lei, floral bouquets, or arrangements; and
- (v) Rock, coral, and sand, not mixed with any organic material.

Any person who violates this rule shall be guilty of a misdemeanor and fined not less than \$100. The provisions of HRS Section 706-640 notwithstanding, the maximum fine shall be \$10,000. For a second offense committed within five years of a prior conviction, the person(s), companies, or organization(s) shall be responsible for clean-up and decontamination fees to remove contaminated material and to fully eradicate any CRB that may have been caused by their violation of not following this Interim Rule. Also, they shall be fined not less than \$500 and not more than \$25,000.

This interim rule shall become effective on _____, 2025, and shall be effective for not more than one year from the effective date.

SHARON HURD
Chairperson, Board of Agriculture and Biosecurity

Kunani Nihipali
Ipo Nihipali
Lot B4 Maunaloa Highway
Hoolehua, Hi. 96729
(808) 349-6407
huliau2014@gmail.com

July 29, 2025

Chairperson Sharon Hurd
Board of Agriculture and Biosecurity
1428 South King Street
Honolulu, Hawaii 96814

**Petition for Interim Rulemaking to Prohibit the Transportation of Material That May
Introduce the Coconut Rhinoceros Beetle to the Island of Molokai**

Dear Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

This petition is made pursuant to section 4-1-23 Hawaii Administrative Rules (HAR) to request the Board of Agriculture and Biosecurity (BAB) and/or the Department of Agriculture and Biosecurity (DAB) adopt an interim rule under section 150A-9.5 Hawaii Revised Statutes (HRS) to prohibit the transportation of material that may introduce coconut rhinoceros beetle (*Oryctes rhinoceros*) (CRB) to the Island of Molokai.

CRB was first detected in Hawaii on the Island of Oahu in 2013.¹ Since that time, the Hawaii Department of Agriculture (referred to as DAB in this petition) and its partners worked to prevent the spread of CRB. Ultimately, those efforts were not successful, and CRB is now established and widespread on Oahu.² For the first 10 years, DAB was able to prevent the movement of CRB to other islands of the State. However, in 2023, CRB was detected on the Island of Kauai, where it is now widespread.³

In an attempt to contain CRB, DAB adopted interim rules under section 150A-9.5 HRS in June 2022, October 2023, and October 2024.⁴ These interim rules require a DAB permit for the movement of CRB host material, including palm plants in the genera *Cocos*, *Livistona*, *Phoenix*,

¹ <https://dab.hawaii.gov/pi/files/2013/01/npa-CRB-5-1-14.pdf>

² <https://www.civilbeat.org/2025/02/ravenous-beetles-go-urban-preying-on-honolulus-iconic-coconut-palms/>

³ <https://dab.hawaii.gov/blog/main/nr23-11crbonkauai/>

⁴ §4-23.1-1 HAR; <https://dab.hawaii.gov/wp-content/uploads/2018/05/CRB-Interim-Rule-10-11-2024.pdf>

Pritchardia, *Roystonea*, and *Washingtonia*; decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks from Oahu to other areas of the State. Unfortunately, during the period that these interim rules have been in effect, CRB has become widespread on the Island of Kauai and has been detected in two areas on the Island of Hawaii and in potted plants that are not covered by the interim rules on the Island of Lanai. Further, DAB's current CRB interim rule is set to expire on October 10, 2025.

In light of this dire situation, we believe the threat and likelihood of the spread of CRB to Molokai creates a situation dangerous to the public health and safety or to the ecological health of flora or fauna present in the State, on the Island of Molokai, which is so immediate in nature as to constitute an emergency. This petition respectfully requests BAB and/or DAB: convene a meeting of the Advisory Committee on Plants and Animals to consider an interim rule as proposed in Attachment A to protect Molokai from the spread of CRB; and if the Advisory Committee determines the proposed interim rule is necessary to address an emergency situation that the Chairperson of BAB be authorized to sign the proposed interim rule so that it may take effect at the earliest possible date.

Alternatively, if the BAB and/or DAB determines that this petition may not initiate an interim rule than we request BAB interpret this petition to request BAB and/or DAB initiate emergency rulemaking under sections 91-3(b) HRS and 4-1-30 HAR, and find that an imminent peril to the public health, safety, or morals, to livestock and poultry health, or to natural resources requires adoption of the emergency rule that includes the substance of the restrictions set out in Attachment A, upon less than thirty days' notice of hearing, and state in writing the reasons for such finding.

Statement of petitioner's interest in the subject matter of the proposed interim rule

We are residents of Hoolehua, Molokai. We farm sustenance and sustainable foods, including coconut on Molokai. Our agricultural interests include a uluniu (coconut grove). In addition to producing agricultural products, we work to restore the culture of ike niu on Molokai. If CRB were to be detected on Molokai, crown and injection pesticide treatments would cause substantial losses to the uluniu and severely impact our efforts to restore traditional practices and uses of coconut trees. If CRB were to become established on Molokai, we would lose the production of the uluniu and, as we are now seeing on Oahu, the trees themselves.

In addition to our direct interests in protecting the uluniu we created on Molokai, we have helped organize, and participated in, many community events, are active community members and strong supporters of Native Hawaiian rights and culture, and work to establish food and water security for Molokai and reestablish a loving relationship with niu, the tree of life.

For these reasons, we have substantial interest, including economic and cultural interests, in seeking the adoption of this interim rule to prevent the spread of CRB to Molokai.

Statement of reasons in support of the proposed interim rule

In Hawaii, counties and other units of local government are preempted from banning or regulating the movement of material to prevent the introduction of a pest or invasive species.⁵ That authority rests solely with DAB. This leaves Maui County and the Island of Molokai unable to require the quarantine or treatment of plants, soil, and other CRB host material moved to Molokai or to otherwise prevent CRB from reaching Molokai.

Further, at this time, there is no acceptable CRB treatment for potted plants and some other CRB host material. For much of the material that can move CRB, this leaves visual inspection at the island of export as the only prevention tool. Molokai does not have a DAB employee on-island to assist with visual inspections of arriving materials. Even if a DAB employee was assigned to Molokai, it would not be sufficient to prevent CRB from reaching the Island. Visual inspections and other requirements failed to prevent CRB from becoming established on the Island of Kauai or from reaching and spreading on the Island of Hawaii. The recent detection of CRB on the Island of Lanai in potted plants that are not typically considered hosts of CRB and that are not covered by the October 2024 CRB Interim Rule is of extreme concern. As DAB is aware, other pests such as cocoi frog, geckos, invasive plants such as miconia and fireweed, and other invasive species (including a gopher snake!) have been detected on Molokai moving in shipments of potted plants, large trees, and bags of soil, some of which had DAB inspection stickers.

Our coconut trees are used for subsistence and sustainable agriculture, including as part of our traditional Hawaiian cultural practices. These trees are not just for landscaping or aesthetic purposes. Molokai is a small island, approximately 260 square miles in size. If CRB is detected anywhere on Molokai, it could spread rapidly across the island, impacting agricultural interests. CRB establishment on Molokai would impact native and endemic palm species, including the rare loulu palm (*Pritchardia hillebrandii*), and other plants and crops of agricultural, ecological, and cultural value. Further, the people of Molokai, including ourselves, utilize coconut trees as an integral part of our economic and cultural life. Preventing CRB from reaching Molokai is an emergency situation, with CRB being established on Oahu, widespread on Kauai, spreading on Hawaii Island, and detected on Lanai. If CRB is detected on Molokai, the treatment of coconut trees will significantly impact the usability of our coconut trees and that of other coconut trees on Molokai, imperil native and endemic palms, and potentially interfere with important traditional and cultural practices.

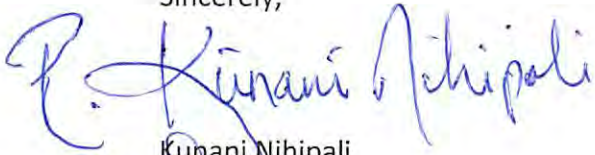
⁵ See *Atay v. Cty. of Maui*, 842 F.3d 688, 709 (9th Cir. 2016); *Syngenta Seeds, Inc. v. Cty. of Kauai*, 664 F. App'x 669, 673 (9th Cir. 2016); and *Hawaii Floriculture & Nursery Ass'n v. Cty. of Hawaii*, No. CIV. 14-00267 BMK, 2014 WL 6685817, (D. Haw. Nov. 26, 2014), *aff'd sub nom. Hawaii'i Papaya Indus. Ass'n v. Cty. of Hawaii*, 666 F. App'x 631 (9th Cir. 2016)

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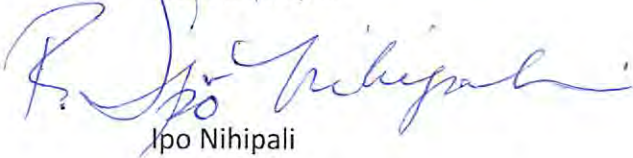
We respectfully request that BAB consider this petition at its August 2025 meeting and that BAB inform the petitioners of its decision on this petition within 30 days, as required by section 4-1-23(c) HAR. Further, we respectfully request that DAB utilize any authorities available to protect Molokai from CRB and other high-priority pests as quickly as possible and, if necessary, waive any filing or timing requirements not met by this petition, with good cause being shown as required by section 4-1-11 HAR, as the need to prevent CRB from reaching Molokai constitutes an emergency.

Thank you for your consideration of this petition and for all your efforts to protect Hawaii and the Island of Molokai from high priority pests, particularly CRB. Please contact us if we may provide any further information regarding this petition.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kunani Nihipali".

Kunani Nihipali

A handwritten signature in blue ink, appearing to read "Ipo Nihipali".

Ipo Nihipali

Attachment A - Draft Proposed Interim Rule

Attachment A

Draft Proposed Interim Rule

To Prohibit the Transportation of Plants, Soil, Gravel, and other CRB Host Material including Decomposing Plant Material Such as Compost, Wood or Tree Chips, and Mulch, Plant Propagation Media; and Other Items Comprised of Decomposing Organic Plant Material Such as Landscaping Material or Erosion Control Socks, to Prevent the Movement of **Coconut Rhinoceros Beetle**, *Oryctes rhinoceros*, to the Island of Molokai from Other Areas of the State

Under authorization granted in Section 150A-9.5, Hawaii Revised Statutes (HRS), the Hawaii Department of Agriculture and Biosecurity (Department) hereby establishes this interim rule to impose a quarantine on the movement of plants, soil, gravel, and other **coconut rhinoceros beetle** (CRB) host material, including decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks, to prevent the spread of the CRB, *Oryctes rhinoceros*, to the Island of Molokai, an island where CRB has not been detected.

The interim rule is needed to prevent the further spread of CRB to the Island of Molokai from other areas of the State. The residents of Molokai utilize the coconut tree (*Cocos nucifera*) and other palm species for subsistence, local food production, and cultural practices and the need to protect these natural resources on Molokai from the imminent peril of CRB constitutes an emergency. Further, CRB establishment on Molokai would impact native and endemic palm species, including the rare loulu palm (*Pritchardia hillebrandii*). CRB has been detected moving between islands of the State on potted plants that are not typically considered hosts of adult CRB and has been detected moving interisland despite the CRB interim rules issued by the Department that took effect on October 4, 2023 and October 11, 2024, that restrict the movement of CRB host material and palm plants in the genera *Cocos*, *Livistona*, *Phoenix*, *Pritchardia*, *Roystonea*, and *Washingtonia*; decomposing plant material such as compost, wood or tree chips, and mulch; plant propagation media; and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks, from the Island of Oahu to other areas of the State.

This interim rule prohibits the movement of potted or bare root plants and other CRB host material, which:

- (A) Includes decaying plant material, mulch, trimmings, fruit and vegetative scraps, wood, stumps, compost, plant propagation media in live planting, commercially bagged plant propagation media or landscaping materials that have been staged or stored in any area of the State, soil, and gravel; and
- (B) Does not include:

- (i) Plant products intended for consumption, such as coconuts, fruits, nuts, edible leaves, leaves used for cooking, and spices;
- (ii) Plant products preserved from decay by treatment or use, such as lumber, woven hats, dried and painted coconuts, wooden posts, wood carvings, and firewood;
- (iii) Seeds for planting,
- (iv) Cut flowers and foliage for decoration, such as lei, floral bouquets, or arrangements; and
- (v) Rock, coral, and sand, not mixed with any organic material.

Any person who violates this rule shall be guilty of a misdemeanor and fined not less than \$100. The provisions of HRS Section 706-640 notwithstanding, the maximum fine shall be \$10,000. For a second offense committed within five years of a prior conviction, the person(s), companies, or organization(s) shall be responsible for clean-up and decontamination fees to remove contaminated material and to fully eradicate any CRB that may have been caused by their violation of not following this Interim Rule. Also, they shall be fined not less than \$500 and not more than \$25,000.

This interim rule shall become effective on _____, 2025, and shall be effective for not more than one year from the effective date.

SHARON HURD
Chairperson, Board of Agriculture and Biosecurity

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Richard Furst <rfurst808@gmail.com>

Date Thu 8/21/2025 8:32 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Richard Furst and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Richard Furst



589 Maunaloa Highway || P.O. Box 650 || Kaunakakai, HI 96748
808-336-0387

August 11, 2025

Subject: Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

Aloha mai kakou Board of Agriculture and Biosecurity

I am Nani Kahinu, owner & operator of Na'ike LLC on the island of Molokai. My husband is the 4th generation of Kahinu's living in Kalamaula, Molokai & we started growing chili peppers to support our business and value added good sauce, Na'ike Shoyu Chili Pepper Blend since 2016. We actively started cultivating our homestead in 2021 & now grow staples such as kalo, banana, mango, coconut and other fruit trees. We faced many hardships in our soil biology & am proud to say in just July we harvested 150# of bananas! Farming is essential to our islands way of life being that so much is imported we must farm to supplement our meals.

I am writing this testimony with urgency to support this petition to prohibit transportation of material that may introduce the CRB to the island of Molokai. Seeing the rapid decline of coconut trees throughout the state of Hawaii is concerning and the fact that the beetle also consumes other staple such as Kalo, very alarming!

So please I urge you to support this petition and take emergency action to support efforts in stopping the spread of CRB .

Mahalo for your time and understanding.

Sincerely,

Jamesie Nani Kahinu
Owner, operator
Na'ike's Kine DBA Na'ike LLC
naike.ltd@gmail.com

Kuulei Alameida
PO Box 125
Maunaloa, HI 96770

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawai'i 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of Moloka'i**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i.

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawai'i on the Island of O'ahu in 2013. The Hawai'i Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kaua'i and has been detected on Hawai'i Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Moloka'i. Moloka'i is a small and interconnected island. If CRB arrives on Moloka'i, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Moloka'i for a 1-year period under an interim rule is the emergency measure needed now.

This issue matters to me personally because I live on Moloka'i and do not want the CRB to ravage our ecosystem or kill off our essential food sources. Our community relies on healthy niu and other plants for cultural, environmental, and food sustainability. Protecting Moloka'i from CRB is critical to safeguarding our way of life.

I urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible.

Thank you for the opportunity to provide this testimony and for your efforts to help protect Moloka'i and other islands of the State from the impacts of CRB.

Mahalo,



Kuulei Alameida

Ali Kaina
4350 Keonelele Ave.
Hoolehua, HI 96729
Hawaiian Homestead Resident

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of
Molokai**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the **Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the Coconut Rhinoceros Beetle
to the Island of Molokai.**

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaii on the Island of Oahu in 2013. The Hawaii Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauai and has been detected on Hawaii Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokai. Molokai is a small and interconnected island. If CRB arrives on Molokai, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokai for a 1-year period under an interim rule is the emergency measure needed now.

Molokai is unique and we are able to be self-sufficient. If CRB arrived on this island it would be devastating to our food source as coconut is incorporated into our lives on many many levels. It is also part of our culture as our ancestors planted many of these groves with intention based on what we need to survive. We treasure this resource, traditions and culture. We need to protect NUI.

I/We urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible. Thank you for the opportunity to provide this testimony and for your efforts to help protect Molokai and other islands of the State from the impacts of CRB.

Aloha,

Ali Kaina

[EXTERNAL] "Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai."

From Kunani Nihipali <huliau2014@gmail.com>

Date Sat 8/23/2025 5:30 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha

I would like to substitute this REVISED Testimony for "Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai."

Kunani a me Ipo Nihipali Testimony

Niu Now & Forever

Integrating 'Ike Niu-Hawaiian Coconut Knowledge, Food Security & Economic Sovereignty

Kunani a me Ipo Nihipali Testimony Niu Now is about ALOHA, hence our Pule: 'E aloha Mai'

is a loving prayer for this *hui*, to restore and reunite, collectively, our 'aina, land, *ka Po'e o Hawai'i*, people of Hawai'i and for the continuity of *niu*.

Kupu ka niu, Kupu ke Kanaka...When niu is planted, humanity grows.

Aloha ke Akua, na 'Aumakua, na Kupuna, na maka'ainana, a me na ho'aloa o Hawai'i.

Mahalo for allowing us to speak here today in behalf of our '*ike Kupuna*, traditional knowledge. To Director Sharon Hurd of the Department of Agriculture & Biosecurity, its Advisory Committee; our Molokai Legislative Representatives: Senator Lynn DeCoite, House Representative Mihana Poepoe, all Islands legislature representatives and friends.

We want to acknowledge and *mahalo* the 'founders' and 'core' members of our **Niu Now** movement, whose *kilokilo*, foresight, *hana nui*, hard work and *kako'o*, support of '*ike niu*, coconut knowledge have made our **Molokai Niu Now** a success: Dr. Manulani Meyer, *Kumu Niu Ai'a*, our teacher and Sri Lankan Brother, Indrajit Gunasekara, our *Alakai*, leaders Kekaula Hanohano & Jessie Mikasobe-Pilialoha Keali'iholomoku, *Niunates o ka pae 'aina o Hawai'i*, farmers, community supporters here to share their *mana'o*, expertise and voices today on this important matter: the protection, preservation & perpetuation of niu, our 'Tree of Life'.

In recorded history, our lives depended on niu, our '*tree of life*'. From childbirth to adulthood, niu has supported and connected Native people with our ancestral lands. As a symbol of abundance, unity, and fertility niu ensures our well-being with its nutritional and traditional medicinal properties. Niu is still a sacred plant of our *nohona*, lifestyle, island diet, sustenance, shelter, material and ceremonial needs, but most our food security. Thus, niu's subsistence and sustainability is more than just landscaping, aesthetic or commercial purposes. We see *kumu la'au niu* planted everywhere: for developments, hotels, parks, schools, landscaping or just for nostalgic ambience. The irony is: *dey wen hemo da lahos, da olos! Cut 'em off! NO NUTS! No coconuts!* Our *tree of life* and food source was reduced to a *liability* that we can *make*, die from in modern Hawai'i.

Hawai'i has the dubious distinction as **the** invasive capital of the world. The **introduced CRB, the coconut rhinoceros beetle** has devastated our Islands. Molokai is a small island. If the CRB is detected **anywhere** on Molokai, it could spread rapidly impacting native and endemic palm species like the rare *loulou* (*Pritchardia hillebrandii*). The CRB is known also to affect other plants and crops of ecological, cultural, agricultural, commercial and economic value. Thus **preventing the CRB from reaching Molokai constitutes an emergency situation**. The CRB is well established on Oahu, widespread on Kauai, spreading on Hawaii Island, and has been detected on Lanai. The chemical treatment used today is a non-solution. **That**, will imperil our native and endemic palms, **significantly impact the usability** of our niu, and further **erode** our food security as Native Hawaiians with traditional and cultural practices aforementioned.

On Molokai, we've identified two ancient *uluniu wahipana*, sacred coconut groves with **genetic and generational niu** on Molokai: one on the east side, the *Uluniu o Mapulehu*, and the infamous *Uluniu o Kapu'aiwa* at *Kalamaula* planted in the mid 1860s. **Their purpose**: for maintaining our health and *mana* of our Molokai Island Kanaka community. **Prince Lot Kapu'aiwa, Kamehameha V** in 1866, planted over a thousand trees to represent that number of warriors. Thus, the CRB is not only cause of **botanical ecological grief**, but a form of introduced **ethnocide** that **would be an erasure of our royal legacy of Hawaiian 'ike niu**, ancestral knowledge of coconut! It is all our sacred kuleana to *malama na uluniu*. It the highest calling for us Kanaka Maoli Hawai'i, literally rooted, generationally in our heritage-based knowledge society. We must continue to protect, maintain, preserve, perpetuate and rejuvenate our Niu Now and Forever. **Aloha'Aina Malama'Aina, love** the land, it'll take care of you.

It's been 12 years and millions of dollars since the CRB has spread to every Island, unchecked. Whose kuleana is it to protect us from this desecration? We know the Federal government is complicit, but that *kuleana* is the State of Hawai'i, as are our benefactors, our representatives, our servants of these *wahipana*, sacred Native and Public Trusts. **As Beneficiaries, we** are the voices of our Kupuna. The State's kuleana is to *kako'o*, support and *kokua*, facilitate **all the proper measures** to address this *pilikia* to help us **protect our Molokai Island**. It is not enuf to prevent the commercial loss by the CRB of our environment, ecology, our food and economic security, but our culture, our lifestyle, our legacy of 'ike niu. The genetic wealth of our uluniu **will be devastated generationally**. *E 'olu'olu*, please, support this Petition we have filed; ensure we are here not asking in vain, that when we leave today we can be assured that tomorrow's generations are protected. Do not let this appeal fall to the wayside and cracks. The ask is easier than the task. *Minamina*, shame, that we Beneficiaries have **to continue to beg** for the tools and resources. *Hewa!* We've seen and felt the '*eha*, the *kaumaha*, the pain and **grief** of our Ohana on **all** infected Islands by this CRB. *A'ole pono...that's not right!*

In summary, potted plants and other CRB **host material** are only visually inspected **at the island of export**. Molokai **does not have an on-island DAB employee to assist with visual inspections of arriving materials**. There are trained canine that can also be used. The threat and likelihood of the spread of CRB to Molokai creates a dangerous situation to our historic, public and ecological health and safety of our flora & fauna of Molokai. In order to prevent the CRB on Molokai, we encourage this Advisory Committee to consider, and authorize the **signing of this proposed interim rule, so that it may take effect at the earliest possible date**. **Please, consider this urgent enough to constitute an emergency declaration**. **Niu Now** is about Reconciliation. It is a **reminder** of our inter-dependency between our people, our 'aina, our ancestors and our future generations that we **must never again lose site of**: our *Tree of Life*. *Ho'omakaukau*, let's *ho'ala hou* the **legacy** of the Niu Now and **FOREVER!** "*Mau ka pono o ka niu, mau ke 'ea o ka 'aina*. When niu is planted, we have our freedom of our land. *Mahalo!*

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity

I am strongly supporting the Interim Rule to Prohibit the Transportation of Material that may Introduce CRB to the Island of Moloka'i. Since biological control is not yet feasible, I presently don't see another way to stop CRBs from also getting a foothold in Moloka'i.

Well-documented, uncontrolled breeding sites on agricultural land where green waste is accepted and where thousands of CRBs are escaping from every month are well known to the Department of Agriculture but not controlled/shut down.

If your time permits, please join me for a quick tour of, for example, Waimanalo on Oahu where such breeding sites continue uncontrolled near surrounding nurseries that incur great financial losses and are often blamed for spreading the CRB's. Many others are also affected as they still depend on coconuts and related crops destroyed by CRBs for food security and self-sufficiency.

Let us all work together by side-stepping ineffective rules and regulations that largely permitted the uncontrolled spread of CRBs. If so, we can perhaps still accomplish the impossible while waiting for breakthrough research on biological control.

Sincerely yours,

Klaus Radtke, Ph.D.
Wildland Resource Sciences



Coconut Rhinoceros Beetle Family Reunion

(in a two-foot section of a five months old, downed coconut tree).

1. Eggs. 2. Young larva.
3. Large 3rd instar larva ready to pupate (*the larval body, enclosed in a protective cocoon or chrysalis, breaks down and is reorganized by special cells into the body of the adult insect*).
4. Female CRB completed laying eggs.

[EXTERNAL] Subj Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introdu

From Alexa Dudoit <kupeke50@gmail.com>

Date Mon 8/25/2025 11:12 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Alexa, and Reyn I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo,

Alexa and Reyn Dudoit



SIERRA CLUB OF HAWAI'I

Testimony to Board of Agriculture and Biosecurity

August 26, 2025

9:00 AM

PQB Conference Room

Agenda Item IV.C.1

In SUPPORT of the Petition for an “Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka‘i”

Aloha mai e Chair Hurd and members of the Board of Agriculture and Biosecurity,

The Sierra Club of Hawai'i strongly urges you to SUPPORT the interim rulemaking petition to temporarily protect Moloka'i, including its present and future generations of residents, from the **devastating agricultural and environmental impacts and cultural erasure** that would result from the introduction and establishment of coconut rhinoceros beetles (CRB).

The petition before you today asks for a common-sense, temporary prohibition on the import of high-risk vectors for the interisland spread of CRB to Moloka'i, namely potted plants, mulch, and similar organic material, with exemptions for non- or low-risk items such as edible fruits and flowers.

Such added protections are urgently needed as CRB continues to spread largely unchecked across O'ahu – **including within agricultural districts that host landscaping and nursery businesses known to off-ship their products** – and as tremendous time and resources are being spent to combat infestations in West Hawai'i, Maui island, and Kaua'i.

The introduction and subsequent spread of CRB on Moloka'i from plants and other host material imported from these other islands may have particularly devastating impacts not just to its niu, but also on local agriculture (e.g. maia (banana), kalo, etc.) and native and in some cases highly endangered species (e.g. hala, loulou, etc.). This in turn would cause deep and potentially irreversible harm to Moloka'i's food security, economy, and ecological and cultural integrity. Notably, Moloka'i does not have the capacity and resources that other islands may have in detecting and eradicating new CRB infestations, making preventative measures such as the proposed interim rules that much more critical.

Unfortunately, the current interim CRB rules set to expire in October – which apply only to O‘ahu, and implement a permitting system for off-shipping plants and other high-risk host material – are clearly not sufficient, as demonstrated by recent CRB introductions to Lāna‘i, and further indicated by recurring detections on the neighbor islands. Accordingly, and in consideration of the particular depth of harm that CRB would inflict on Moloka‘i, an additional layer of blanket protection as proposed here can and must be implemented as soon as possible.

The Sierra Club notes that the staff submittal suggests the interim rule **may** run afoul of the Commerce Clause of the U.S. Constitution. This is highly speculative and dubious at best, particularly in light of the recent Supreme Court ruling in National Pork Producers et. al. v. Ross, 598 U.S. 356 (2023), which upheld a California state law that, by prohibiting the sale of pork grown in inhumane conditions, had allegedly unduly burdened interstate commerce. However, the Supreme Court ruled that since this law did not explicitly discriminate against out-of-state products in favor of in-state products, and in practice did not demonstrate such a discriminatory intent, it did not violate the Commerce Clause.

The proposed interim rule here does not explicitly discriminate against out-of-state products and is obviously solely intended to protect Moloka‘i from the devastating agricultural, ecological, and cultural effects of invasive CRB. Even if a challenge to the rule was resolved before its one year expiration date, given this recent Supreme Court precedent, it is highly unlikely that such a challenge would succeed. The submittal’s dubious and vague legal speculation should not be a basis for denying this interim rule petition.

In contrast, the Hawai‘i State Constitution does contain provisions that would heavily favor the Board’s support of the interim rule petition:

- The public trust doctrine under Art. XI Sec. 1, which imposes upon all agencies fiduciary obligations to “conserve and protect Hawai‘i’s natural beauty and all natural resources . . . [and] to promote the development and utilization of these resources in a manner consistent with their conservation and in furtherance of the self-sufficiency of the State”;
- Art. XI Sec. 3, which requires the state to “promote diversified agriculture [and] increase agricultural self-sufficiency”; and
- Art. XII Sec. 7, which requires the state to “protect all rights, customarily and traditionally exercised for subsistence, cultural, and religious purposes and possessed by ahupua‘a tenants who are descendants of the Hawaiian Islands prior to 1778, subject to the right of the State to regulate the same” (i.e. Native Hawaiian traditional and customary rights).

The failure to adopt the proposed interim protections and to stand idly by while the natural resources, diversified agriculture, agricultural self-sufficiency, and Native Hawaiian traditional and customary rights of Moloka‘i remain under such clear and present threat of harm would fly in the face of these constitutional provisions -

provisions that the Board has taken an oath to uphold.

While the Sierra Club does acknowledge that more tailored longer-term solutions may be warranted, as also suggested in the staff submittal, the robust interim protection provided by this rule petition would provide the time needed to explore and develop such solutions. Meanwhile, failing to adopt the proposed interim protections would only increase the risk of CRB introductions and spread on Moloka'i, which would severely limiting what options may be available, and vastly increase their respective costs.

Finally, the Sierra Club notes that the submittal's contention that the Board's support of the petition would force its hand in supporting all petitions prohibiting the movement of commodities, regardless of their biosecurity risk, has zero basis in logic or the law.

In closing, the Sierra Club expresses its deep appreciation to the community members who have brought this petition forward, and who have endeavored to ensure that Moloka'i residents, farmers, and businesses understand the importance of this initiative. **The Sierra Club urges the Board to take advantage of the opportunity that this petition now provides you, to fulfill your constitutional, statutory, and generational kuleana, and to SUPPORT the adoption of the proposed interim rules.**

Mahalo nui for the opportunity to testify.

[EXTERNAL] Protecting Molokai from the Coconut Rhinoceros Beetle

From Barbara Kalipi <lhkalipi@gmail.com>

Date Mon 8/25/2025 11:13 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Board members,

My name is Barbara Kalipi and I am a life-long resident of Molokai. The threat of the coconut rhinoceros beetle to our island community's agricultural resources is real and will be catastrophic. My son is a taro and avocado farmer, and we also have other fruit trees and gardens to supplement our table and share with our ohana and friends. A subsistence economy is alive and well on Molokai, and we rely on what we grow and the natural resources we gather to not just survive, but to thrive in the lifestyle we choose. This subsistence economy is a real part of our livelihood to feed our families, and we need your support to take all measures to prevent the coconut rhinoceros beetle from invading our 'āina. We are also making a concerted effort to increase our agricultural production through the support of University of Hawaii's CTAHR and the University of Hawaii Maui College, as well as nonprofit organizations like Sust'ainable Molokai and Maui Economic Opportunity, and our own Maui County Department of Agriculture. It is also noted that all our elementary schools have school gardens where students have real life application of their math, science, and other subjects - not to mention that they eat what they grow.

The fact that this one insect may have the capacity to destroy not only our precious coconut trees, but other crops as well really scares me for the future of Molokai. Many of our young people have returned to Molokai to live and raise their children, and to help build a culturally grounded, values-based economically resilient future for the generations to come. Food sovereignty and sustainability is one of our goals.

I don't know about or can comment on the commerce laws that your staff has concerns about. I hope you can find a solution to mitigate their concerns, and if not, that you collaborate with as many partners as possible to put the resources in place that are needed to protect our island from this threat to our economic future and lifestyle.

Mahalo.

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Bianca Isaki <bianca.isaki@gmail.com>

Date Sat 8/23/2025 9:47 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

--

Bianca Isaki, Ph.D., Esq.
Law Office of Bianca Isaki
1720 Huna St. 401B

Honolulu, Hawai'i 96817
mobile 808.927.5606

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[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Chai Blair-Stahn <chai.blairstahn@gmail.com>

Date Mon 8/25/2025 9:14 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Chai Blair-Stahn and I am writing in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Chai

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Charles and Barbara Bostwick <pacifictplants@gmail.com>

Date Mon 8/25/2025 1:51 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Please do not send any plant material or mulch from Oahu to Moloka'i. It is to risky.

Charles & Barbara Bostwick

Pacific TransPlants Export Nursery

pacifictplants@gmail.com

(808) 987-4770

Former President of Hawaii Export Nursery Association (HENA)

Current Secretary for Hawaii Floriculture Nursery Association (HFNA)

[EXTERNAL] STRONG SUPPORT - Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Choon James <choonjameshawaii@gmail.com>

Date Sun 8/24/2025 11:51 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>; Wayne Tanaka <wayne.tanaka@sierraclub.org>

STRONG SUPPORT for Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Choon James. I'm one of thousands of small farmers in Oahu who have planted coconut trees at our farm during the past 20 years or so. Just about 100 of our coconut trees have succumbed in this continuing Hawaii Coconut Rhinoceros Beetle (CRB) epidemic.

This Hawaii CRB Disaster on our islands' coconut trees and others is a continuing monumental blight with immeasurable negative consequences for Hawaii on so many levels.

What is Hawaii WITHOUT coconut palms in its landscape? Many areas in Hawaii now look like war-zones with these dying coconut trees.

On the Ag level, many farmers have suffered irreparable harm from losing their capital investments in growing these coconut trees. Now, farmers have to spend more money trying to save them. Most times, these efforts are without success because CRB knows no boundaries. It does not work when one farmer is able to try to protect or treat their coconut trees while other farmers do not.

Coconut trees are being destroyed before our eyes as many owners and farmers do not have the resources to fight against CRB.

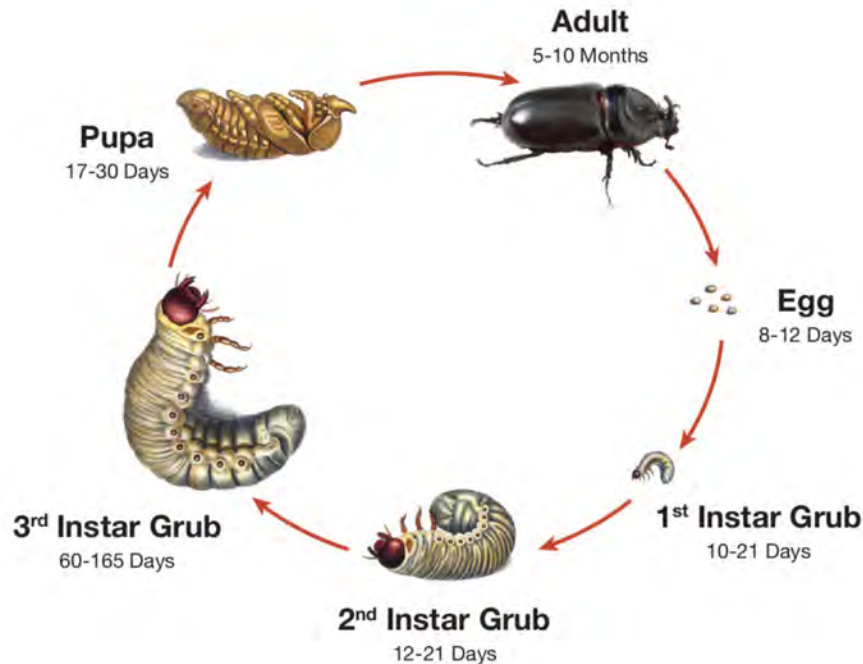
Residents are no longer able to drink from their coconuts nor can they eat the meat of the nut when a tree is treated. In addition, there is no organized system of verifying or managing public health as consuming tourists or residents do not have any idea whether their coconuts are from treated trees or not.

It's unfortunate that Hawaii has reached this disastrous stage of decimation from the CRB.

Let's do what we can to help Molokai prevent and control widespread decimation of Hawaii's coconut trees.

I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

Private farmers are incapable of stemming this CRB Epidemic. It requires the strong arm of the government to protect Hawaii and its resources. Containing this CRB Epidemic requires committed and continuing strategic leadership.



I also concur with the the Sierra Club's advocacy, including the following:

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative

that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today."

Choon James
Kahuku, Oahu

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Cora Currier <coracurrier@gmail.com>

Date Mon 8/25/2025 1:13 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Cora Currier and I am a Molokai resident.

I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo,

Cora Currier

[EXTERNAL] CRB

From Cory <333cory@gmail.com>

Date Sun 8/24/2025 8:45 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha,

I am in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. CRB destroys plants and crops of great cultural, ecological, and economic importance--niu, oulu, maia, kalo, and more. And Moloka'i has few resources to fight CRB if they appear.

mahalo,

Cory Harden, Hilo

August 24, 2025

Kainalu Ranch
9759 Kamehameha V Hwy
Kaunakakai, HI 96748

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of
Molokai**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the **Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the Coconut Rhinoceros Beetle
to the Island of Molokai.**

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaii on the Island of Oahu in 2013. The Hawaii Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauai and has been detected on Hawaii Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokai. Molokai is a small and interconnected island. If CRB arrives on Molokai, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokai for a 1-year period under an interim rule is the emergency measure needed now.

The impacts of invasive species have and continue to be the primary threat to Kainalu Ranch's productivity, and, unfortunately, we are not alone. Despite its legacy, Molokai is no longer the agricultural hub it once was, and the establishment of

invasive species is primarily to blame. The Department has an opportunity to protect Molokai from CRB, which poses a significant threat – please heed the call.

We urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to approve the interim rule. Thank you for the opportunity to provide this testimony and for your efforts to help protect Molokai and other islands of the State from the impacts of CRB.

Aloha,

Stephanie Dunbar-Co
Owner, Kainalu Ranch

[Godfrey Akaka Jr. | (808) 213-1013]

Board of Agriculture and Biosecurity

August 26, 2025 – 9:00 a.m.

Plant Quarantine Branch

1849 Auiki Street

Honolulu, Hawaii 96819

Testimony in Support of the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle (CRB) to the Island of Molokai

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing in strong support of the Petition for Interim Rulemaking to prohibit the transportation of materials that may introduce the Coconut Rhinoceros Beetle (CRB) to the Island of Molokai.

As noted in the Petition, CRB was first detected in Hawai'i on O'ahu in 2013. For a decade, the Department of Agriculture and Biosecurity (DAB), in partnership with community and state agencies, successfully contained the pest to O'ahu. Unfortunately, CRB has since spread to Kaua'i and has now been detected on Hawai'i Island. This presents an urgent and immediate threat of further spread.

Molokai is a small and tightly connected island community. If CRB were to arrive, it would likely spread rapidly, causing devastating impacts to our agricultural industry, native ecosystems, and cultural resources. Preventing CRB from reaching Molokai is not just important—it is essential.

I strongly support prohibiting, for a one-year period under an interim rule, the movement of potted plants, soil, gravel, mulch, and other CRB host materials to Molokai. This emergency measure is necessary to strengthen protections at this critical time. Every major island in Hawai'i is now affected by CRB except Molokai. Stricter regulations are needed immediately to ensure Molokai does not become the next island to face this destructive pest.

I respectfully urge the Board of Agriculture and Biosecurity to direct the Department of Agriculture and Biosecurity to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule, and to approve it without delay.

Mahalo for the opportunity to provide this testimony, and for your continued efforts to protect Molokai and the State of Hawai'i from the severe impacts of CRB.

With Aloha,

Godfrey Akaka Jr.

Ane Bakutis
Molokai Plant Extinction Prevention Program
PO BOX 698
Kaunakakai, HI 96748

Board of Agriculture and Biosecurity
August 26, 2025
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony in Support of the Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the CRB to the Island of
Molokai**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

I am writing to support the **Petition for Interim Rulemaking to Prohibit the
Transportation of Material That May Introduce the Coconut Rhinoceros Beetle
to the Island of Molokai.**

As the Petition states, Coconut Rhinoceros Beetle (CRB) was first detected in Hawaii on the Island of Oahu in 2013. The Hawaii Department of Agriculture and Biosecurity (DAB), working with its partners, was able to keep CRB from spreading to other islands of the State for 10 years. However, CRB is now widespread on Kauai and has been detected on Hawaii Island. There is an immediate threat of it spreading further.

New tools are needed to keep CRB out of Molokai. Molokai is a small and interconnected island. If CRB arrives on Molokai, it may spread very quickly, seriously impacting agricultural, natural, and cultural resources. Prohibiting the movement of potted plants, soil, gravel, mulch, and other CRB host material to Molokai for a 1-year period under an interim rule is the emergency measure needed now.

There are 4 species of endemic Loulu fan palm to Molokai. One species is down to 1 individual remaining in the wild. My team and I have worked tirelessly to save this species from extinction as well as collect and grow the three other more common Loulu. Loulu populations of different species are being decimated on Oahu by CRB. I

urge you to pass this ruling and not allow any type of organic material CRB larva can be in to come to Molokai.

I/We urge the Board of Agriculture and Biosecurity to direct DAB to convene a meeting of the Advisory Committee on Plants and Animals to consider the interim rule described in the Petition and approve the interim rule as quickly as possible
Thank you for the opportunity to provide this testimony and for your efforts to help protect Molokai and other islands of the State from the impacts of CRB.

Aloha,

Ane Bakutis

To: DAB.BOARD.TESTIMONY@HAWAII.GOV

Subject: *Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai*

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Lori Buchanan** and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Molokai is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Molokai. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Molokai with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lānai.

The establishment of CRB on Molokai would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Molokai.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo plenty for your consideration of this matter.

Lori Buchanan
Molokai Resident
(808) 658-6706

[EXTERNAL] CRB mitigation

From Dave and Kathleen <jonellipacific@yahoo.com>

Date Mon 8/25/2025 12:57 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Acknowledging the inevitability of CRB infestation is not the same as not trying to delay -- or frankly hastening -- its reality. In this way, it is not unlike death: we know it is coming for all of us, but we practice caution and do not actively seek it. We have seen the devastation to the niu already caused by CRB on Oahu, where I live. If we can forestall the invasion a bit longer, if the costs are not too great, why not try? Let one more generation enjoy the beauty and bounty of the coconut palm. Who knows? Maybe industry will find the solution tomorrow. Don't concede prematurely.

David Jones, M.D.

[Yahoo Mail: Search, Organize, Conquer](#)

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit Transportation of Material that May Introduce CRB to Moloka'i

From dave mulinix <davidraymulinix@gmail.com>

Date Sun 8/24/2025 8:50 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is David Mulinix, Statewide Organizer for Greenpeace Hawaii and on behalf of our thousands of members and supporters statewide I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I strongly urge you to SUPPORT the interim rule proposal before you today.

Mahalo nui for your consideration of this matter.
David Mulinix, Statewide Organizer, Greenpeace Hawaii

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai

From davidsher@juno.com <davidsher@juno.com>

Date Sun 8/24/2025 8:17 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Sherry Pollack and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the coconut rhinoceros beetle (CRB) to the Island of Molokai.

Hawaii Island, Oahu, Kauai, Maui, and Lanai already know too well the catastrophe that invasive species create. Here on Oahu, we are greatly suffering from infestations of CRBs and Little Fire Ants (LFAs), just to name a couple. My own neighborhood is in the process of hopefully eradicating a LFA infestation. **These infestations should never have happened.** They are the results of a broken system that you have the responsibility to fix. The spread of invasive species must be stopped and Islands like Molokai must be protected. That is your kuleana.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Molokai is not a reason to reject them. DO NOT let these illogical and disingenuous reasons be the basis for not providing Molokai with the enhanced temporary protection that it needs and deserves.

We know the impacts that the CRB may have on not just our iconic and culturally vital nui, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others. We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawaii Island, Maui, and most recently, Lanai.

The establishment of CRB on Molokai would be devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Molokai.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Molokai is unacceptable. We cannot allow this to happen. DO YOUR JOB and make the right decision on the petition before you today.

I strongly urge you to SUPPORT the interim rule proposal before you today.

Sherry Pollack
Ahuimanu

[EXTERNAL] Testimony- Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From More Molokai- Ke Nani Kai Condo <moremolokai@gmail.com>

Date Sun 8/24/2025 9:54 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Debbie Millikan and I am a part-time resident and farmer on Molokai and Oahu. I am writing to share my **STRONG SUPPORT** of the Interim Rule that will prevent the transportation of materials to Moloka'i.

The impacts of CRB have been devastating and with Moloka'i as the last main island to NOT have CRB, it really is absolutely essential that we do all we can to prevent its spread. There really can be no excuse for preventing the transmission of this incredibly invasive and destructive beetle. Moloka'i is home to critically important niu groves, not to mention the many residents and farmers who in recent years have been planting niu. Niu is a food-producing plant not an ornamental- we must protect our right to grow niu on Molokai.

I respectfully but strongly urge you to SUPPORT the interim rule proposal. Mahalo nui for the opportunity to submit testimony on this critically important issue.

Debbie Millikan
2702 Kaluakoi Rd
Maunaloa, Moloka'i

--

[EXTERNAL] TESTIMONY - PROTECT MOLOKAI

From Debbie Misajon <debbie@thecoconuttraveler.com>

Date Mon 8/25/2025 9:01 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Good morning,

Please find my testimony in support of restricting the movement of potted plants, and other CRB breeding materials, from Oahu to other islands – specifically Molokai. Potted plants being the very loophole that allowed beetles to reach Lanai. Set aside the Commerce Clause during this extremely dangerous time for the islands and protect Molokai, a community that has done so much to retain Hawaiian cultural heritage and values.

Thank you.

Warm regards and aloha,
Debbie

DEBBIE MISAJON

FOUNDER OF THE COCONUT TRAVELER

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[EXTERNAL] Testimony for Agenda item IV.C.1

From Debbie Ward <cordylinacolor@gmail.com>

Date Mon 8/25/2025 9:24 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

To: DAB.BOARD.TESTIMONY@HAWAII.GOV

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Deborah J Ward and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

I am farming ten acres on the island of Hawai'i. I have had to alter how I grow my crops, including kalo, 'ulu, and 'uala, and I have had to abandon some, due to feral pigs, African snails, Erythrina gall wasp, Banana Bunchy Top Virus, stinging nettle caterpillar, little imported fire ants (LFA), Plumeria Longhorn Beetle, Queensland Longhorn Beetle, Puccinia Rust, Rapid 'Ohi'a Death (ROD) and more. Imported pests and diseases severely affect my ability to provide nutritious food to my community. This is not (only) a landscape issue, **this is a food security issue!** I pay taxes, and I contribute food to the Hawaii Food Basket. I cannot convince my son to keep farming, as he sees the obstacles as insurmountable. We, as farmers, put so much effort into feeding our community, with VERY little support from our government; the least our government can do is limit the risk! MUCH MUCH more must be done to prevent the introduction of pests to our islands!!!!

I agree with the Sierra Club that the reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Sincerely,
Deborah Ward
Laiku Farm
P.O. Box 918
Kurtistown HI 96760
8-08-769-2403
cordylinecolor@gmail.com

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Boisvert-Jorgensen <infofordenise@yahoo.com>

Date Mon 8/25/2025 7:42 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The CRB has been allowed to spread over the years thanks to government inaction, interminable procrastination, and selfish business interests.

Doing everything possible - - even anything possible - - immediately to protect Moloka'i is better than the utter failure of the status quo.

The success rate of how well the CRB has spread forces a little private citizen to wonder whose side you are on.

Mahalo for your consideration of doing the right thing.

Denise Boisvert

Honolulu

Please confirm receipt of this testimony.

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Dennis Kanahale <puuhonua13@icloud.com>

Date Mon 8/25/2025 6:43 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc Kunani Nihipali <huliau2014@gmail.com>

 1 attachment (435 KB)

Moloka'i.CRB.8.25.25.pdf;

Aloha Chair Sharon Hurd, members of the Biosecurity Advisory Committee and our legislative representatives

I would like to submit my testimony in support of Protecting Molokai from the Coconut Rhinoceros Beetle. Mahalo Nui, pu'uhonua

[EXTERNAL] Agenda IV.C.1- Interim rule on CRB

From Diane Ware <volcanogetaway@yahoo.com>

Date Sun 8/24/2025 1:05 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Diane Ware and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. Most invasive species can at best only be controlled. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Diane Ware
808-967-8642
P. O. Box 698
99-7815 Kapoha

Volcano HI 96785

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Manulani Aluli Meyer <manulani@hawaii.edu>

Date Mon 8/25/2025 9:35 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

 1 attachment (262 KB)

Niu Now Letter.pdf;

Aloha mai Board of Agriculture and Biosecurity,

I am writing with aloha and support for the interim rule to prohibit the transportation of unsafe materials that may introduce CRB to the island of Molokai.

My letter is attached.

me ka na'au 'oia'i'o,

Dr. Manu Aluli Meyer

Niu Now @ UH West Oahu

phone: 808-954-2531

manulani@hawaii.edu

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Pulama Lima <pulama@kaipumakanichc.org>

Date Sun 8/24/2025 10:37 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Dr. Pūlama Lima**, Executive Director of **Ka Ipu Makani Cultural Heritage Center**, and I write on behalf of our organization in **strong support** of the interim rule to prohibit the transport of materials that may introduce the coconut rhinoceros beetle (CRB) to Moloka'i.

Moloka'i is the last major Hawaiian island free from CRB, and the importance of keeping it that way cannot be overstated. Our island has limited capacity to detect, contain, or eradicate new infestations, and the arrival of CRB would threaten not only agriculture but also cultural practices and ecological systems that sustain our community. The loss of niu, loulou, mai'a, kalo, and other canoe crops central to our identity and livelihood would have devastating, long-lasting effects.

Arguments suggesting that this rule is not worthwhile because it does not *eliminate* all risk overlook the urgent need to at least reduce the threat. Protecting Moloka'i from CRB is not about economic isolation—it is about safeguarding fragile ecosystems and cultural lifeways that cannot be replaced once lost. The interim rule is narrowly tailored, temporary, and necessary.

We have already seen how quickly CRB spreads between islands through infested mulch, compost, and nursery products. The pattern of repeated detections on Hawai'i Island, Maui, and now Lāna'i underscores that prevention is far more effective and less costly than response.

For Moloka'i, this is an issue of survival—of food security, cultural continuity, and ecological resilience. We therefore **urge the Board to approve the interim rule** and give Moloka'i the protection it needs and deserves.

Mahalo nui for your leadership on this critical matter.

Respectfully,

Dr. Pūlama Lima

Executive Director

Ka Ipu Makani Cultural Heritage Center

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Genasis Kalawe <gmkalawe@gmail.com>

Date Mon 8/25/2025 8:56 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha,

My name is Genasis Melia Kalawe and I am a 7 generation resident of our beautiful island of Moloka'i. I am writing to you in full support of prohibiting the transportation of material that may introduce the Coconut Rhinoceros Beetle to this island of Moloka'i - an island that we, the community, have kept in protection and preservation for generations to come.

This rule would not only stop the introduction of Coconut Rhinoceros Beetle to our environment here, but it will also benefit our continued efforts in keeping Moloka'i as is. We have seen the massive destruction of the Beetle to not only Niu (coconut) but other native plants that are vital for cultural traditions and practices. This rule would protect our delicate ecosystem so that we can continue to live in harmony with nature.

Please consider this prohibition as a step towards saving whats left of our true Hawaiian ecological system.

Mahalo

Me ka 'oia'i'o,
Genasis Melia Kalawe

[EXTERNAL] Testimony re IV.C.1

From Georgia Acevedo <gacevedo@hawaii.edu>

Date Sun 8/24/2025 6:10 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Georgia Avedo and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo, Georgia Acevedo

[EXTERNAL] Molokai CRB Petition

From gregory kahn <geekahn@gmail.com>

Date Mon 8/25/2025 9:47 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

I support the petition to protect Molokai from the infestation of the Coconut Rhinoceros Beetle.

Gregory Kahn
Molokai

[EXTERNAL] Testimony in SUPPORT of Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka'i

From Hannah Rozendo <hrozendo@hawaii.edu>

Date Sun 8/24/2025 7:22 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kākou,

I am submitting this testimony in SUPPORT of passing an **Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i**, with hopes that this effort amplifies to all the islands. CRB is one of our greatest invasive species threats in Hawai'i (and there are many) because it jeopardizes traditions, culture, resources, and most importantly, food security and an abundant future for us. I am in full support of halting any movement of materials that may host CRB grubs, adults, or eggs between islands, especially this rule to protect Moloka'i. Please make this quick decision with a huge and lasting impact for healthier life in Hawai'i.

Mahalo nui,
Hannah Rozendo

[EXTERNAL] Testimony in SUPPORT of Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka'i

From Hannah Rozendo <hrozendo@hawaii.edu>

Date Sun 8/24/2025 7:21 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kākou,

I am submitting this testimony in SUPPORT of passing an **Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i**, with hopes that this effort amplifies to all the islands. CRB is one of our greatest invasive species threats in Hawai'i (and there are many) because it jeopardizes traditions, culture, resources, and most importantly, food security and an abundant future for us. I am in full support of halting any movement of materials that may host CRB grubs, adults, or eggs between islands, especially this rule to protect Moloka'i. Please make this quick decision with a huge and lasting impact for healthier life in Hawai'i.

Mahalo nui,
Hannah Rozendo

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Haunani O'Sullivan <haunanimolokai@yahoo.com>

Date Mon 8/25/2025 3:08 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Haunani Madela and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

[EXTERNAL] Testimony supporting Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Hi'ilei Kawelo <Hiilei@paepaeoheeia.org>

Date Sun 8/24/2025 8:13 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Hi'ilei Kawelo and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo, Hi'ilei Kawelo

--

Hi'ilei Kawelo

Executive Director
Paepae o He'eia
Ph:(808)236-6178
Fax:(808)234-1999
P.O. Box 6355
Kaneohe, HI 96744
www.paepaeoheeia.org

[EXTERNAL] Agenda Item IV.C.1. Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka'i

From Hina Ka'ōpua-Canonigo <hina@hapahi.org>

Date Mon 8/25/2025 11:57 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Members of the Board of Agriculture and Biosecurity,

On behalf of Hawai'i Alliance for Progressive action (HAPA), I am writing to express our strong **support for measure Agenda Item IV.C.1**. This community driven proposal to enact an interim rule to prohibit the transportation of material that could potentially introduce CRB to Moloka'i, protects the environment and biosecurity of the entire island of Moloka'i. Therefore it is the responsibility of this Board to take action and pass this measure.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

CRB has decimated entire areas across the Pae 'Āina, leaving behind barren patches where decades-old kumu niu once flourished. We are now seeing the results on Kaua'i, O'ahu, Lāna'i, Maui, and Hawai'i of the lack of urgency to address this issue. Now is the time for this committee to be proactive and potentially prevent this aggressive issue from impacting an entire island. The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Additionally we are now aware that the CRB is not exclusive to impacting iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

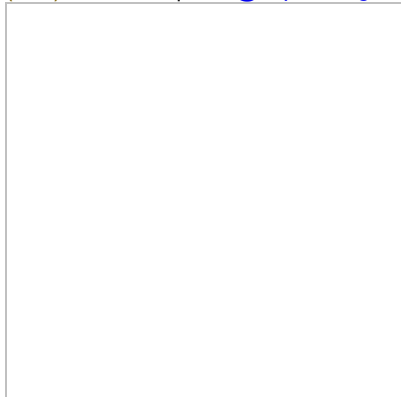
It is essential for the Board to support the ongoing fight against CRB in our Pae 'Āina, and take preventative measures to ensure the preservation of our natural and cultural resources. We are in strong **support of measure Agenda Item IV.C.1**, and urge the Board to do the same.

Me ke Aloha 'Āina,

Hina Ka'ōpua-Canonigo
Lead Community Organizer

--

Hina Ka'ōpua-Canonigo (*she/her/'o ia*)
Lead Community Organizer | [HAPA](#)
(808) 445-5787 | hina@hapahi.org



"To catalyze community empowerment and systemic change towards valuing people and 'āina ahead of corporate profits." - The HAPA Mission

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Indrajit Samarasingha Gunasekara <indrajit@hawaii.edu>

Date Sun 8/24/2025 3:36 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha e Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Indrajit Gunasekara, Co-Founder of Niu Now and Director of the Hawai'i Community Coconut Project. I am here today to testify in **strong support** of the interim rule to prohibit the transportation of material that may introduce the coconut rhinoceros beetle (CRB) to the island of Moloka'i.

The staff's recommendation to reject this temporary, one-year measure is deeply concerning. The argument that the rule should be dismissed simply because it may only *reduce*, and not *eliminate*, the risk of CRB introduction is illogical. Risk reduction is precisely the goal of biosecurity—especially when the stakes are this high.

The interim rule does **not** violate the Commerce Clause—it does not discriminate against interstate commerce or favor in-state products. Its intent is purely protective: to prevent the introduction of a highly destructive invasive species that could devastate Moloka'i's agricultural systems, cultural practices, and natural ecosystems.

Moreover, concerns that passing this rule would somehow set a precedent for future overreaches are unfounded. Evaluating any future proposals on their own merits is always the Board's prerogative. Let's not allow speculative concerns about hypothetical future rules to justify inaction today.

We know the threat CRB poses—not just to our cherished and culturally significant niu (coconut), but also to other vital species such as loulu (*Pritchardia*), maia (banana), and kalo (taro). These plants are foundational to Hawai'i's Indigenous cultural heritage and local food systems. We also know how easily CRB spreads via the movement of infested plants, mulch, and other organic materials, especially between islands. The recent detections on Hawai'i Island, Maui, and Lāna'i make this clear.

Moloka'i remains the last major Hawaiian island free from CRB. With limited capacity on the island for detection, response, or eradication, the establishment of CRB would be catastrophic. Failing to enact temporary, preventative measures would be tantamount to allowing a crisis to unfold—one that threatens not just crops, but the cultural identity and ecological integrity of the island.

Standing by while this pest spreads is, quite simply, a form of cultural erasure. I urge you not to let that happen.

For all these reasons, I respectfully and strongly urge you to adopt the interim rule and give Moloka'i the temporary protection it urgently needs and deserves.

Mahalo nui for your time and thoughtful consideration.

Me ke aloha,

Indrajit Gunasekara

Co-Founder, Niu Now

Director, Hawai'i Community Coconut Project

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Nani Kahinu <naike.ltd@gmail.com>

Date Sat 8/23/2025 11:30 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

 1 attachment (291 KB)

Testimony (1).pdf;

Aloha mai kakouu Chair Hurd and Members of the Board of Agriculture and Biosecurity,

Please see my letter of strong support of the Interim Rule to Prohibit the Transportation of Materials that may Introduce the CRB to the Island of Moloka'i.

I respectfully strongly urge you to support the interim rule proposal before you today. Please help save the last island, it is looked to as a food source for so many, and CRB will be devastating if there is no action to try and prevent it from happening on Molokai.

Mahalo for your time.

Jamesie "Nani" Kahinu

808-336-0387

<https://naikeskine.com/>



Naike's Kine



Naike.LLC

Creating sweet and savory sauces and foods featuring Molokai grown produce for the retail market throughout the pae 'aina to support our local economy!

Reduce, Reuse, Recycle, Repeat

Save on landfill space, compost your food waste

[EXTERNAL] Testimony in support of Molokai Community to "Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai."

From Jim Albertini <ja@malu-aina.org>

Date Mon 8/25/2025 7:11 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aug. 25, 2025

7AM

Aloha DAR Board,

Our organization supports the Moloka'i community petition for a one-year interim rule to "[Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai.](#)"

We have been farming here on Hawaii Island for more than 45 years. We have seen the terrible impact of invasive species first hand, Our organization "Malu 'Aina" -- Land of Peace, was named by Bernard Punikaia of Kalaupapa , Molokai.

We all need to do everything possible to reduce and eliminate the potential for CRB to be introduced to Moloka'i. This is a step in the right direction, but we need to do more on every island.

Mahalo.

Jim Albertini, president of Malu 'Aina

--

Jim Albertini Malu 'Aina Center For Non-violent Education & Action P.O. Box 489
Ola'a (Kurtistown) Hawai'i 96760

Phone 808-966-7622 Email ja@malu-aina.org Visit us on the web at www.malu-aina.org

August 25, 2025

To: DAB.BOARD.TESTIMONY@HAWAII.GOV

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

Please add my name, **John L. Reppun** to the already well-written input as follows, logical, a timely preventative measure that should be a "no brainer" to the DOA, now formally tasked with the additional name that includes "Biosecurity". Past failure to timely respond to threat has (rightfully) tarnished our State of Hawaii Ag Departments reputation. Let's Change that!

I was born on the island of Molokai and, while I too seldom get a chance to visit – I and my extended 'ohana have a continuing interest and love for the island and its families who strive to be as self-sustaining as possible while also helping the rest of the State to fashion critical stewardship processes, more important now than ever before as we face the increasing spread of invasives.

To this end:

"My name is **John Reppun** testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Molokai is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Molokai. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Molokai with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Molokai would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Molokai.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Molokai is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today.

Mahalo nui for your consideration of this matter."

John L Reppun
Waiahole Valley, Ko'olaupoko, O'ahu
farmer and resident
(808)277-8686; jreppun@gmailcom

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Joseph Wat <joew@keyproject.org>

Date Mon 8/25/2025 2:54 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Joe Wat and I am testifying in **STRONG SUPPORT** of the interim rule to prohibit the transportation of material that may introduce the CRB to the Island of Molokai.

The Department of Agriculture has so far not demonstrated any capacity to manage Coconut Rhinoceros Beetles once established on an island in Hawai'i. With an incredible cultural heritage tied to this plant and the many resources it contributes (food, fiber, leaves for weaving, wood for pahu and other materials), the state **MUST** take action to protect against the continued expansion of the Coconut Rhinoceros Beetle.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

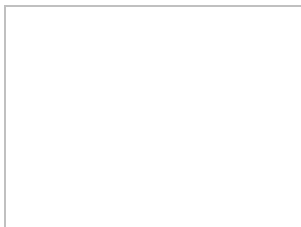
Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

I respectfully but strongly urge you to **SUPPORT** the interim rule. Mahalo for your consideration.

Aloha no,

- Joe

--



Joe Wat

Community Development Coordinator
KEY Project

☐ 808 239 5777

☐ **keyproject.org**



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[EXTERNAL] CRB on Molokai

From Judy Mick <ppchawaii@yahoo.com>

Date Sun 8/24/2025 6:10 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha- It's imperative that we prevent CRB from getting to Molokai. We have not done enough to protect our other islands and the results are devastating.
Please override commerce rules and protect Molokai. Mahalo. Judith Mick, Oahu

[EXTERNAL] Rhinoceros Beetle

From Judy Mertens <judymertens@gmail.com>
Date Mon 8/25/2025 11:38 AM
To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

to Sarah, Mahealani, Zhantell, kahenawai3@yahoo.com, haunanimolokai@yahoo.com, me, info@molokaihistoryproject.org, aloharose@cox.net, geekahn@gmail.com, tylor@bujified.com, bostwickb7@icloud.com, cpactol@hawaiipublicradio.org, editor@themolokaidispatch.com, parrandassociates@gmail.com, rahowden@gmail.com, dinoakaiinc@gmail.com, ryartzoff@sonic.net, trags808@gmail.com, kupeke50@gmail.com, likowallace@gmail.com, faypacheco@yahoo.com, leilanichow@gmail.com, leilaanasazi@gmail.com, paubaranch@gmail.com, ryanbruno650@gmail.com, soulek.alice@gmail.com, deanchowdc@gmail.com, bahar.yaghoubi@gmail.com, kalehuasproat@yahoo.com, hcmanooga@gmail.com, keaka1298@yahoo.com, Tehani, hina@sustainablemolokai.org, jasonbsykes@gmail.com, malianolan@gmail.com, rockpipe@aol.com, haleomana@gmail.com, harmoncew@gmail.com, lopez808@gmail.com, carlaleolani@gmail.com, Jason, meledudoit@gmail.com, jkarla@yahoo.com, Keani, Kauai, palmeraki76@gmail.com, snakikeikicare@hawaiiantel.net, molokaihuntingclub@gmail.com, wailanitanaka@gmail.com, audnewman@gmail.com, steviechaikin@gmail.com, mercyritte@gmail.com, molokaimatt@gmail.com, oshea.greg@gmail.com, myrosebudscreations@gmail.com, kelleyt@hawaii.edu, sventin1@yahoo.com, mahie.mcpherson@gmail.com
 <https://mail.google.com/mail/u/0/images/cleardot.gif>

Moloka'i needs our kōkua!

To: DAB.BOARD.TESTIMONY@HAWAII.GOV

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Judy Mertens and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo, Judy Mertens

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai

From Kanoelani Davis <molokainuiahina@gmail.com>

Date Mon 8/25/2025 8:28 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Kanoelani Davis, and I am submitting my testimony in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle (CRB) to the island of Moloka'i.

I come from generational roots on Molokai. My 'ohana has lived and thrived here for many generations, grounded in a deep relationship with the 'āina and our natural resources. We are farmers, gatherers, educators, and practitioners of this land, not just for ourselves, but for those who came before us and those who will come after. This kuleana is one I carry with unwavering commitment.

The arguments made by staff to oppose this interim rule do not hold up under scrutiny. To say that the rule should be rejected simply because it will only reduce, but not entirely eliminate, the risk of CRB introduction is a dangerous and short-sighted position. Protection is not an all-or-nothing proposition; it is about doing what we can now to prevent irreversible harm. The interim rule is narrowly tailored, does not violate interstate commerce, and most importantly, offers a necessary layer of protection for our vulnerable island.

The coconut rhinoceros beetle is not just a threat to agriculture, it is a threat to our culture, our identity, and our way of life. The niu, loulou, mai'a, and kalo are not just plants; they are our kupuna, our food systems, our ceremony, and our mo'okū'auhau. These plants connect us to our kupuna and sustain our lāhui today. Should CRB be allowed to establish on Molokai, it would devastate not only our ecosystems but the cultural practices that rely upon them, many of which are still actively and uniquely perpetuated on our island.

Molokai remains the only main Hawaiian island not yet impacted by CRB. But we know from recent detections on Hawai'i Island, Maui, and most recently Lāna'i, that this pest travels easily with the movement of mulch, green waste, and other organic materials. And unlike larger islands, Moloka'i does not have the infrastructure or resources to manage large-scale eradication efforts. Prevention is our best, and perhaps only, line of defense.

We must do everything in our power to protect Molokai from this invasive pest. It is our kuleana to mālama this 'āina so that our keiki and mo'opuna will inherit a land that still feeds, teaches, and shelters them. This is not merely a regulatory matter, it is a matter of cultural survival, environmental justice, and intergenerational responsibility.

I respectfully urge you to pass this interim rule and stand with Molokai in **taking proactive, protective action.**

Mahalo nui for your time, for your consideration, and for honoring the voices of those who continue to aloha 'āina.

Me Ka Ha'aha'a,

Kanoelani Davis

Molokainuiahina

[BOOK MY CALENDAR](#)



Kanoelani Davis
Kumu | Kahupono | Executive Director

📞 Ho'ākā Mana - Native Hawaiian Organization

✉️ PōMahina Designs

👤 Molokainuiahina

🌐 hoakamana.org | PoMahinaDesigns.com

Mālama kekahi i kekahi me ka hō'ā mālama. Strengthening indigenous identity as a community to thrive sustainably through skill sets, self-sovereignty, and healing.

[EXTERNAL] Testimony supporting Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity, My name is [your name] and I am testi...

From Kapua Kawelo <jobykapua@gmail.com>

Date Sat 8/23/2025 1:10 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Kapua Kawelo and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo, Kapua Kawelo

[EXTERNAL] Rhinoceros beetle

From Kauai Manera <kauimanera@gmail.com>

Date Mon 8/25/2025 12:54 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kakou,

My name is Deldrine Kauinohea Kapuni Manera. I am a lifelong resident of Moloka'i.

We've heard devastating stories of how the rhinoceros beetle destroyed so much vegetation in Hawaii and recently on Maui. It just cannot come to Moloka'i. Your board has the power to stop this from happening. Supposedly being an economic threat that you have no real concrete measures to confirm at this point, we can confirm that the rhinoceros beetle would devastate Moloka'i's vegetation and trees. It's devastation would bypass any economic threat. Already the lauhala scales have decimated majority of the pūhala on the east end. we don't need more invaders on our island

Please consider my plea. I am a 70 year old Kupuna begging the board to use your na'au to guide you. This is a pestilence. It is your kuleana to protect Moloka'i.

Lord have mercy.

Kau'i

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Keala Fung <kealadancer@gmail.com>

Date Sun 8/24/2025 10:56 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Keala Fung and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

Keala Fung
Honolulu, HI

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Keith Neal <windrider4002@yahoo.com>

Date Fri 8/22/2025 8:12 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Keith Neal and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that will likely introduce the Coconut Rhinoceros Beetle (CRB) to the Island of Moloka'i.

Impacts of the Coconut Rhinoceros Beetle are clearly known. This destructive pest can spread through the movement of infested plants, mulch, and other products between islands as demonstrated by repeated new infestations on Hawai'i Island, Maui, and Lāna'i.

The preventable import of the CRB destructive pest on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. Moloka'i island is not currently impacted by CRB. This community is ill prepared with resources to detect, respond, and eradicate this invasive pest! It is imperative that all measures necessary are taken to prevent the introduction of CRB to Moloka'i.

I respectfully, and strongly urge you to **SUPPORT** the interim rule proposal of the Interim Rule to Prohibit the Transportation of Material.

Mahalo nui for your consideration.

-Keith Neal
Waimea

[EXTERNAL] Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From keri zacher <zacherk@hotmail.com>

Date Sat 8/23/2025 1:43 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Keri Zacher and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue.

Sincerely,
Keri Zacher

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Kilia Purdy-Avelino <kpurdyavelino@gmail.com>

Date Sat 8/23/2025 5:28 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Kilia Purdy-Avelino. I am a 4th-generation Ho'olehua Homestead Farmer. My dad started a small family agri-business in 1982, Nā Hua o ka 'Āina, dba Purdy's Nut Farm. We grow and produce macadamias, kukui, and coconuts along with other fruit and food trees.

I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

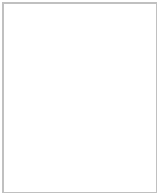
We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

*ke aloha o ka 'āina,
Kilia Purdy-Avelino*

*"A'ole hana nui ke alu 'ia!"
No task is too great when done together!*



[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Waikiki - Hawaii Condo <hawaiicondo@yahoo.com>

Date Mon 8/25/2025 7:54 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha,

I am submitting testimony in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The CRB can has been kicked so far up the palm tree that future generations will be shaking their heads wondering what the heck were we thinking!

They'll ask how was it possible to spread so quickly and with so little and so belated government intervention when the experts were warning you and advising you how to prevent it the entire time?

Please don't make the same mistake for Moloka'i that was made for the other infested islands.

Mahalo,
Kim Jorgensen
O'ahu

[EXTERNAL] 08/26/2025 BAB agenda item IV.C.1

From La'a Poepoe <poepoelaa@gmail.com>
Date Mon 8/25/2025 8:21 AM
To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Dear Board of Ag and Biosecurity members,

Thank you for accepting this testimony in support of the petition's intent as a starting point for The Dept of Ag and Biosecurity to take quick, decisive action to do absolutely anything at this point to prevent CRB from being transported to Molokai by all the ways possible.

The analysis and staff recommendation presented in PQB's submittal to the board in response to the Nihipali petition describes some of the concerns from PQB, and appears to acknowledge the potential for an environmentally, culturally and economically devastating biological crisis, while offering reasons for denial through rebuttals in defense of the department's lack of meaningful preventative action thus far. The worst method of prevention is 'no prevention', or just waiting for an infestation to happen to begin eradication operations.

I recommend that the interim rule presented in the petition be supported and implemented.

Thank you,

La'a Poepoe
Molokai resident
DHHL Pala'au homesteader
Native Hawaiian cultural practitioner
Small-farm business owner

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Laurel Nakanishi <laurel.nakanishi@gmail.com>

Date Mon 8/25/2025 10:32 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Laurel and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

me ka ha'aha'a,

Laurel

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Leanna Bair <leannagfparkerbair@gmail.com>

Date Mon 8/25/2025 10:55 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Leanna and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Olan Leimomi Fisher <oleimomimo@gmail.com>

Date Mon 8/25/2025 12:22 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

I am Lei Fisher testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

I live on the north shore of O'ahu where the CRB have been devastating the niu and mai'a populations. Even in my own yard I have witnesses these bugs killing established trees, and it is such a helpless feeling not being able to do anything at this point.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Lei Fisher,
O'ahu, Hawai'i

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material That May Introduce the CRB to the Island of Moloka'i

From Leilani Lindsey Kaapuni <lkaapuni@gmail.com>

Date Mon 8/25/2025 9:55 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and members of the Board of Agriculture and Biodiversity,

My name is Leilani Lindsey Kaapuni and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that may Introduce the Coconut Rhinoceros Beetle to the island of Moloka'i. Moloka'i deserves your highest concern and regard on this issue. The ancient and storied Uluniu o Kapuaiwa, Oneali'i and many other sites of ancient coconut groves that are still in use today would be devastated by the introduction of the CRB. It would not only lead to the loss of natural resources but of historic, sacred and culturally significant sites of Native Hawaiians. Please **SUPPORT** this **INTERIM RULE!** We are following your decision on this matter very closely.

Me ka mahalo,
Leilani Lindsey Kaapuni

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Leimana RC <leimanarc@gmail.com>

Date Sat 8/23/2025 8:12 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Leimana Lukela Ritte-Camara and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

I was born and raised on Moloka'i, where I witnessed my parents and kūpuna dedicate their lives to protecting our island's unique lifestyle, resources, and traditions of sustainability. For generations, Moloka'i has stood up against threats to our way of life, always with the future of our children in mind. I share this not only for myself, but for the generations yet to come.

*On Moloka'i, we know how to live with less, and we understand the value of sacrifice when it comes to protecting what we love. That is why, regarding the CRB, if there is even the slightest chance that something being transported could bring the beetle to our island, our answer must be firm: **'A'OLE. NO!***

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Leo Nahe Smith <its.leonahe@gmail.com>

Date Mon 8/25/2025 8:29 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Leo Nahe Smith** and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Liz Wiggans <elizabethmwiggans@gmail.com>

Date Mon 8/25/2025 5:06 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

 1 attachment (18 KB)

Testimony - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i - Wiggans, Liz - 8.25.2025.docx;

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

Please see the attached testimony in support of the interim rule to prohibit the transportation of material known to carry the invasive Coconut Rhinoceros Beetle, also pasted below.

Mahalo for the opportunity to testify, and for all of your work for Hawai'i.

Sincerely,
Liz Wiggans

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

I strongly urge you to **support the interim rule proposal** to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. This rule is a practical, low-cost, prophylactic mitigation strategy prevent cultural and economic devastation. Below I provide two key reasons for this support: first, to safeguard the substantial public investment in Moloka'i's unique and irreplaceable food and ecological systems; and second, to avoid the far greater costs and challenges of eradicating CRB once established

First, much state and federal funds have been invested in Moloka'i's food production system.^[1] This growing system of integrated seed production, native species protection, and investment in irreplaceable endangered plants and animals cannot be risked with transferring the breeding ground of destructive CRB. Annually, invasive species cost \$21 billion in damages to agricultural product and ecosystem damage.^[2]

Second, eradication of established CRB populations, even with early and rapid techniques, is difficult and costly.^[3] In FY2017, approximately \$3.0 billion in federal funds were spent managing invasive species across jurisdictional agencies, those agencies have seen a dramatic decrease in workforce and funding in the past six months.^[4]

As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, Moloka‘i must be protected against the culturally and economically costly impacts of CRB.

Please support the interim rule proposal before you today.

Mahalo for the opportunity to testify, and for your work for Hawai‘i.

Sincerely,
Liz Wiggans

[1] Press Release: “Hirono Secures Several Key Priorities for Hawaii in Senate Agriculture Committee’s Farm Bill.” *Senator Mazie Hirono*, 10 May 2024.
<https://www.hirono.senate.gov/news/press-releases/hirono-secures-several-key-priorities-for-hawaii-in-senate-agriculture-committees-farm-bill>.

[2] Sheridan, Kerry. “Invasive Species Cost the US \$21 Billion per Year, Study Finds.” *WUSF*, 4 Jan. 2022, WUSF Public Media. <https://www.wusf.org/local-state/2022-01-04/invasive-species-cost-the-us-21-billion-per-year-study-finds>.

[3] United States Forest Service. *Forest Insect and Disease Leaflet 191*. U.S. Department of Agriculture, Apr. 2023.

[4] Sheikh, Pervaze A. “Invasive Species: A Brief Overview.” Congressional Research Service, In Focus, IF11011, 26 Oct. 2018. <https://www.congress.gov/crs-product/IF11011>.

[EXTERNAL] Agenda IV.C.1 Interim Rule to prohibit transportation of material to Molookai

From Lori Buchanan <molokailori@gmail.com>

Date Mon 8/25/2025 9:02 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc Lori Buchanan <molokailori@gmail.com>

 1 attachment (14 KB)

CRB testimony Lori online.docx;

Dear DAB Board,

Please accept my testimony in **SUPPORT** of the interim rule submitted by Kubani and Ipo Nihipali

Mahalo,

Lori Buchanan
(808) 658-6706

[EXTERNAL] Agenda IV.C.1 Interim Rule to Prohibit

From Lori Buchanan <molokailori@gmail.com>

Date Mon 8/25/2025 8:53 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc Godfrey Akaka <88akaka@gmail.com>

 1 attachment (61 KB)

CRB Interim Rule Testimony- Revised Akaka.pdf;

Please find my testimony in **SUPPORT** of the petition by Kunani and Ipo Nihipali

Thank you,

Mr. Godfrey Akaka

Molokai Resident and Homesteader

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Luana Neff <alakukui@aol.com>

Date Mon 8/25/2025 8:59 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and members of the Boarf of Agriculture and biodiversity.

My name is Luana Busby Neff and I am testifying in STRONG SUPPIRT of the Interim Rule to Prohibit the transportation of Material that may Introduce the CRB to the Island of Moloka'i! Moloka'i deserves your highest concern and regard on this issue, pleaseSUPPORT THE INTERIM RULE TO PROHIBIT the Transportation of Materials that may introduce the CRB to the Island of Moloka'i...

Molokai Nui A Hina! keep Moloka'i safe!

"Molokai no kaheke"

Sincerely o'ia i'o,

Luana Busby Neff



[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Madison Owens <owensmadison138@gmail.com>

Date Mon 8/25/2025 8:12 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Madison Owens and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Standing idly by and refusing to adopt temporary protections against the introduction of CRB to Moloka'i is nothing less than facilitating cultural erasure. We cannot allow this to happen - please make the right decision on the petition before you today.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

*Mahalo,
Madison Owens*

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Malia Nolan <malianolan@gmail.com>

Date Mon 8/25/2025 1:07 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Malia, and I am writing in **strong support** of the Interim Rule to prohibit transporting materials that could bring the coconut rhinoceros beetle (CRB) to Moloka'i.

The reasons presented for rejecting this temporary, one-year rule don't hold up. Even if the rule only reduces—rather than completely eliminates—the risk of CRB introduction, that is still a meaningful and necessary step. Protecting Moloka'i is worth taking every precaution. The Commerce Clause is not an issue here, as this rule does not favor Hawai'i products over out-of-state products—it simply safeguards against a devastating pest. And adopting this interim rule does not bind the Board to approve any future bans or broad restrictions.

We know what's at stake. CRB threatens not only our culturally significant and iconic niu (coconut), but also loulu, maia, kalo, and other plants that hold cultural, ecological, and economic importance. Once CRB decimate coconuts, they move on to bananas, papaya, and mango. We produce the majority of the papaya for the state of Hawaii. That would be catastrophic. We also know how quickly CRB can spread through the movement of mulch, green waste, and nursery products, as seen in recent detections across Hawai'i Island, Maui, and most recently, Lāna'i.

If CRB were to establish on Moloka'i, the consequences would be severe for agriculture, cultural practices, and the island's fragile ecosystems. Moloka'i is the last main Hawaiian island not yet impacted, and with limited resources to respond if CRB arrives, prevention is our best— and ONLY — real option.

For these reasons, I urge you to **support this interim rule** and give Moloka'i the protection it urgently needs and deserves.

Mahalo nui for your time and thoughtful consideration.

Malia Blissard Nolan

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Martha Ross <mrosshawaii@gmail.com>

Date Mon 8/25/2025 8:12 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

My name is Martha Ross and I testify in strong support of the Interim Rule to Prohibit the transportation of materials that may introduce the Coconut Rhinoceros Beetle (CRB) to Moloka'i.

Please take every policy action possible now to reduce and/or eliminate CRB infestation and devastation. CRB is a crisis emergency for Hawai'i now. Approve this Interim Rule to be proactive to protect Moloka'i now, and follow-up by convening with other policy makers to lead additional policy actions needed for the reduction as well as the elimination of CRB throughout Hawai'i.

History will show you did not wait until it is too late to take all possible actions to reduce and/or eliminate CRB. Hawai'i, Hawai'i keiki today and future generations will benefit.

Approve this Interim Rule. Mahalo for your time.

Martha Ross

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Mary Spadaro <mlspadaro@yahoo.com>

Date Sat 8/23/2025 9:31 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Mary Spadaro. I STRONGLY SUPPORT the one-year interim rule to "[Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai](#)", the last of the main islands without infestation by this devastating pest.

It seems absolutely unconscionable to me that the Department of Agriculture and Biosecurity staff are recommending that the Board reject the petition. I have read it and the reasoning for rejecting it does not make sense and sounds very disingenuous. I know you are hearing the specifics of this from the Sierra Club and I am in agreement with them.

Have you driven around the N Shore of Oahu and seen the dead coconut trees that have been killed by this pest? This has all been happening very fast and soon all the coconut trees on all main islands will look like those on Oahu's North Shore. THIS IS HAWAII! Coconuts are important to us culturally and economically! This even more true for the island of Moloka'i.

Far too many opportunities have been lost to protect our unique and fragile environment from invasives. The record is dismal. Please don't add another lost opportunity to this record. Commercial interests must be balanced with environmental health. We already know that in the long view, that economic interests are also harmed by an unhealthy environment.

Respectfully,
Mary Spadaro

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Matt Yamashita <molokaimatt@hotmail.com>

Date Sun 8/24/2025 2:40 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Matt Yamashita and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. I am a 4th generation Moloka'i resident, entrepreneur, hunter and fisherman, backyard farmer, community volunteer, and an Emmy Award winning filmmaker.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

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We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo!

Matt Yamashita

Owner, [Quazifilms Media](#)

808.442.2740 cell

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Matthew Lynch <matthewklynch@gmail.com>

Date Mon 8/25/2025 9:26 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board,

My name is Matthew Kamakani Lynch and I urge you to adopt this interim rule to give Moloka'i the protection it urgently needs.

In keeping with the precautionary principle, we must act now to prevent harm rather than wait until it is too late to protect Moloka'i. Reducing risk is not meaningless - it's absolutely necessary.

The staff's objections are misguided. The rule does not violate the Commerce Clause, nor does it obligate the Board to adopt future broad bans. To reject it on these grounds is illogical and irresponsible.

Moloka'i is the last main Hawaiian island free of CRB. Its arrival would devastate agriculture, culture, and ecology—threatening niu, loulu, maia, kalo, and more. With limited local capacity to detect and eradicate new infestations, prevention is our only real defense.

I strongly support the Interim Rule to prohibit transport of materials that may introduce CRB to Moloka'i.

Mahalo nui,

Matthew Kamakani Lynch
+1 (808)-386-8470

Connect on LinkedIn: <https://www.linkedin.com/in/matthewklynch>

[EXTERNAL] AGENDA IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Matthias Asano <miksasano@gmail.com>

Date Mon 8/25/2025 8:51 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Kakou - Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Matthias Asano and everyone here on island knows me as Sumu. I am here to testify in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that may introduce the CRB to our island Moloka'i.

Moloka'i depends on it's Natural Resources and have been doing so for generations. We are a small knit community who Malama our Aina and is a proof to all that here, Nature still reigns. We cannot afford to lose our Coconut Trees, our Kalo, Papaya's, Hala, and many more.

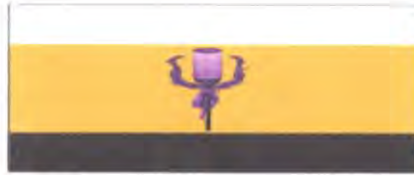
Should CRB reach our island it will surely be devastating and our island will founder. Plants and crops vital to us will have a great impact should CRB reach our shores.

Please give us the protection that we deserve and put a halt to this. We, the people of Moloka'i always have and will continue to keep our Aina safe.

I Strongly Urge you to Support the Interim Rule and help Keep Moloka'i (one of the last Hawaiian Islands) Safe from CRB. Mahalo nui for your consideration of this matter.

Mahalo,

Matthias "Sumu" Asano
Kapa'akea Homesteader & Concerned Citizen



Nation of Hawaii

Date: Monday, August 25, 2025

Testimony of the Nation of Hawai'i

in Support of Protecting Molokai from the Coconut Rhinoceros Beetle (CRB)

Aloha e Chair, Director Sharon Hurd, members of the Biosecurity Advisory Committee, and our legislative representatives,

The Nation of Hawai'i submits this testimony in strong support of protecting Molokai from the devastating threat of the Coconut Rhinoceros Beetle (CRB).

For generations, niu has been our **Tree of Life**—a sacred source of food, medicine, shelter, ceremony, and abundance. On Molokai, this kuleana carries even greater weight with the historic uluniu groves at Mapulehu and Kapu'aiwa, planted under Kamehameha V as a living legacy of health, mana, and resilience for the Hawaiian people.

The arrival of CRB on Molokai would not only destroy these sacred groves and food security, but also amount to a cultural and ecological erasure of ancestral knowledge—an ethnocide of 'ike niu.

Molokai currently has no Department of Agriculture staff dedicated to inspections, leaving the island vulnerable. Existing CRB treatments are inadequate, and prevention remains the only viable path forward. We urge this committee to adopt the proposed **interim rule as an emergency measure** to protect Molokai before it is too late.

This is not only about stopping an invasive pest. It is about honoring our kuleana to our ancestors, safeguarding the cultural and ecological wealth of Molokai, and ensuring that future generations inherit living groves of abundance rather than the silence of their loss.

On behalf of the Nation of Hawai'i, we ask for your immediate action. Niu is reconciliation. Niu is life. Protect Molokai. Protect our future.

Me ka ha'aha'a,

Pu'uhoŋua Dennis K. B. Kanahele
Head of State, **Nation of Hawai'i**

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Morgan Tooch <morgantooch@gmail.com>

Date Sat 8/23/2025 11:33 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Morgan Tooch and I write in **strong support** of the proposed interim one-year rule to restrict the movement of high-risk materials that may introduce the coconut rhinoceros beetle (CRB) to Moloka'i.

The reasons cited by staff to reject this proposal are deeply flawed. It has been argued that because these rules would only *reduce*, and not *eliminate*, the risk of CRB introduction, they should not move forward. This reasoning is *unsound*. Risk reduction—even if not absolute elimination—is at the very heart of pest prevention and quarantine policy. Every added safeguard matters when we are dealing with an invasive pest capable of *devastating entire ecosystems and economies*.

Concerns about the Commerce Clause are equally misplaced. That constitutional protection exists to prevent state-level economic favoritism against out-of-state products. This interim rule does no such thing—it applies evenhandedly across counties and is intended solely to prevent environmental harm and economic losses caused by CRB. Likewise, adoption of this temporary measure would not obligate the Board to adopt any future proposals restricting commodities in a blanket fashion. Suggesting otherwise is both misleading and unfounded.

We already know what is at stake. The coconut rhinoceros beetle has the potential to damage not only our culturally iconic and sacred *niu* (coconut palm), but also crops and plants vital to Moloka'i's way of life, including *loulou*, *maia*, *kalo*, and others. The beetle has spread swiftly between islands—Hawai'i Island, Maui, and most recently Lāna'i—largely through movement of infested mulch, compost, plants, and green waste. Without stricter preventative measures, Moloka'i will certainly be next.

Moloka'i is the last main Hawaiian island free of CRB. Its agriculture is small-scale, tightly interwoven with subsistence and cultural practices, and highly vulnerable to disruption. The island does not have the same level of resources that larger counties might deploy for detection and eradication. To allow CRB to establish there would be devastating not only to Moloka'i's food security, economy, and ecosystems, but to its cultural integrity and resilience.

For all these reasons, **it is imperative that we act now**. A strong, temporary, precautionary rule is both justified and urgently needed. Once CRB takes hold, eradication becomes virtually impossible. Prevention is the only real solution.

Therefore, I respectfully but firmly urge you to adopt this interim rule and provide Moloka'i with the protection it deserves.

Mahalo nui for your time and thoughtful consideration.

Morgan Tooch

707-567-0681

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Morgan Dobbins <morganndobbins@gmail.com>

Date Mon 8/25/2025 1:51 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha!

My name is Morgan Dobbins and I want to deeply encourage the Board to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle (CRB) to the Island of Moloka'i.

I have been working with Niu Ola Kaiāulu Action Initiative on Kaua'i for the past few months as we address the tremendous threat that CRB poses to all our food plants. I have worked hours sifting through mulch and felt the devastation of uncovering hundreds of larvae in Po'ipū, Wailua and Līhu'e. I've seen the decaying coconut trees along our coconut coast. There is evidence CRB target not only coconut trees but also banana and papaya trees, as well as kalo. As an island community largely reliant on food shipments, the threat of a super invasive and resilient beetle that could eradicate all our attempts at any food sovereignty has driven me to do all I can to help in the fight to eradicate these beetles here on Kaua'i.

The fact that these pests have not yet reached Moloka'i is not only a miracle but a hope for the continued life and cultivation of coconut trees in Hawai'i and other Pacific islands decimated by this beetle. There may be a future where we need to replace trees across Hawai'i and possibly the Pacific with those that are safely grown on Moloka'i. Please act swiftly to protect your island. Please act now with the thought of your sister islands and what a future with no coconut trees could mean. Protect these ancestral and cultural plants that are slowly dying painful, horrific deaths and are crying out for our help. **Your** help.

Coconut trees provide drinkable water in the event that any of the fresh water gets contaminated and they are a staple food source for many residents of and visitors to Hawai'i. To lose this deeply spiritual and cultural resource is a heartbreaking reality observed on other pacific islands like Guam. It doesn't have to become a reality for Moloka'i.

I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Please consider the future of this plant and the future of all our islands as you make your decision today.

Mahalo nui for your consideration of this matter.

With all the Aloha 'Āina,
Morgan

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Nancy McPherson <nanimcp7684@gmail.com>

Date Sun 8/24/2025 8:08 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Nancy McPherson** and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet

impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

I strongly support the work that Ipo and Kunani Nihipali and the Niu Now Moloka'i project are doing, as well as the heroic, decades-long efforts of Lori Buchanan and MoMISC to keep Molokai free of damaging invasive species.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

Ke aloha no, Nancy McPherson

PO Box 2164. Aiea, HI 96701



Aloha mai e Board of Agriculture and Biosecurity,

August 25, 2025

We are “Niu Now” – a community inspired movement of people dedicated to cultural agroforestry – specifically formed to grow niu, or coconut trees. For the last ten years we have gathered thousands of people together to re-learn, restore and rejuvenate our understanding of ‘ike niu – coconut knowledge. Our teacher, Mr. Indrajit Gunasekara, is from Southern Sri Lanka but has been in Hawai‘i for 20+ years. He is now the Director of the Hawai‘i Coconut Community Project for the Kaulunani Urban Forestry Program. We are fortunate to have his ‘ike niu.



We have been helping communities, especially Molokai, understand processes to care for their niu and how to stave off CRB attacks. The learning curb is steep, but we are communicating with each other, and we’re committed to developing Niu Nurseries and giving out healthy and diverse coconuts so that uluniu, coconut groves, can grow and feed us once again in Hawai‘i.

I am writing with aloha and support for the interim rule to prohibit the transportation of unsafe materials that may introduce CRB to the island of Molokai. We know firsthand here in the West Side of Oahu the effects of CRB on our uluniu, our coconut groves. Now we are alerting all of Hawai‘i to prepare in the best ways possible. Mahalo for your care and foresight.

Kupu ka niu kupu ke kanaka.

When coconuts grow, humanity flourishes.

Dr. Manu Aluli Meyer
University of Hawai‘i West Oahu
Niu Now Co-Founder
manulani@hawaii.edu

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Paul Hanley <pauljhanley95@gmail.com>

Date Sun 8/24/2025 11:16 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

To: DAB.BOARD.TESTIMONY@HAWAII.GOV

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Paul Hanley and I am a resident of Molokai. I STRONGLY SUPPORT the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Paul Hanley

Kualapuu Molokai

808-213-5511

[EXTERNAL] RCB PREVENTATIVE MEASURES FOR MOLOKAI-TESTIMONY

From Pohai Ryan <pohair@oha.org>

Date Mon 8/25/2025 1:15 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc Kunani Nihipali <huliau2014@gmail.com>; Luana Alapa <luanaalapa@gmail.com>; Luana Alapa <luanaa@oha.org>; Sommer Soares <sommers@oha.org>

RCB CONTROL MEASURES FOR MOLOKA'I

Testimony submitted by: Trustee Luana Alapa, Office of Hawaiian Affairs, Trustee representing Molokai & Lanai.

Position: State Department of Agriculture and Biosecurity officials, support Moloka'i's request to halt shipments of high-risk materials such as potted plants, mulch, compost, soil, and gravel to Moloka'i for one year as a preventative measure to stop the invasion of RCB on the last island to not be affected to date by this invasive species.

I humbly submit this testimony to the State of Hawaii Department of Agriculture and Biosecurity Board in support of Molokai's efforts to protect our island from invasive takeover by the invasive coconut rhinoceros beetle and to stop it from reaching our shores.

Recent media reports show that residents of Molokai is asking the state to halt shipments of high-risk materials such as potted plants, mulch, compost, soil, and gravel to Moloka'i for one year. They say these materials are prime breeding grounds for the destructive beetle, which has already devastated areas across O'ahu and has begun spreading on Kaua'i, and Hawai'i Island.

This year, two CRB hitched a ride in potted plants from O'ahu to Lāna'i. The beetles were spotted during quarantine on Lāna'i and killed. Molokai does not want to experience the same fate.

On Maui, detections in compost and a rotting coconut stump triggered emergency removals in 2023. Moloka'i is the only island CRB has not been found on.

Recent media reports indicate community members and groups say Moloka'i's heavy reliance on its own resources makes the threat especially concerning.

"CRB establishment on Moloka'i would fundamentally impact not just coconuts, but also bananas, kalo, and other important crops," said Wayne Tanaka, Sierra Club of Hawai'i Director. "At risk is cultural integrity, food security, the local economy, and a way of life."

Moloka'i residents like Kunani Nihipali, who is part of Niu Now and proposed the emergency ask, warn the beetle could wipe out coconut and hala trees along with crops central to the islands culture.

"This is an emergency situation for us," he said. "What if you come to Hawai'i and there are no coconut trees anymore, no hala, no papaya?"

Others, including Moloka'i and Maui invasive species coordinator Lori Buchanan, who is also a Moloka'i resident, testified in a hearing last month that the island is already under pressure, with large landscaping imports tied to upcoming hotel renovations.

According to Hawaii News Now, currently, an emergency rule restricts the movement of certain CRB breeding materials from O'ahu to other islands, but it does not include potted plants—the very loophole that allowed beetles to reach Lāna'i. State agriculture and biosecurity officials, however, are recommending the Board deny Moloka'i's request. They argue the proposed ban could violate the Commerce Clause, would block proven treatment methods such as fumigation or heat treatment, and includes items like gravel that have not been shown to spread CRB.

I strongly urge The State of Hawaii Department of Agriculture Biosecurity voting Board members to consider the fragility of the situation, also at threat is the ancient Kapuaiwa Coconut Grove in Kalama`ula planted by King Kamehameha V. Please support Molokai's efforts to protect our island from this most dangerous invasive species.

Mahalo,
Trustee Luana Alapa/pr

[EXTERNAL] Testimony in SUPPORT of Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka'i

From Rafaell Rozendo <rafaellrozendo@gmail.com>

Date Mon 8/25/2025 8:51 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kākou,

I am submitting this testimony in SUPPORT of passing an **Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i**, with hopes that this effort amplifies to all the islands. CRB is one of our greatest invasive species threats in Hawai'i (and there are many) because it jeopardizes traditions, culture, resources, and most importantly, food security and an abundant future for us. I am in full support of halting any movement of materials that may host CRB grubs, adults, or eggs between islands, especially this rule to protect Moloka'i. Please make this quick decision with a huge and lasting impact for healthier life in Hawai'i.

Mahalo nui,

Rafaell Rozendo

[EXTERNAL] Testimony in SUPPORT of Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka'i

From Rafaell Rozendo <rafaellrozendo@gmail.com>

Date Mon 8/25/2025 8:49 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kākou,

I am submitting this testimony in SUPPORT of passing an **Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i**, with hopes that this effort amplifies to all the islands. CRB is one of our greatest invasive species threats in Hawai'i (and there are many) because it jeopardizes traditions, culture, resources, and most importantly, food security and an abundant future for us. I am in full support of halting any movement of materials that may host CRB grubs, adults, or eggs between islands, especially this rule to protect Moloka'i. Please make this quick decision with a huge and lasting impact for healthier life in Hawai'i.

Mahalo nui,
Rafaell Rozendo

Testimony Submission for 8/26/25 BOA Meeting, Agenda Item IV.C.1

From Rep. Mahina Poepoe <reppoepoe@capitol.hawaii.gov>

Date Mon 8/25/2025 7:57 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

 1 attachment (139 KB)

Testimony_BOA_082625_RepPoepoe.pdf;

Aloha, Please accept the attached PDF document as testimony for the 8/26/25 meeting of the Board of Agriculture relating to agenda item IV.C.1, Request for Review of the Petition From Kunani and Ipo Nihipali to Initiate Administrative Rule Making to Implement an Interim Rule Pursuant to Hawaii Revised Statutes §150A-9.5

Please let me know if you have any questions or need additional information.

Mahalo, Mahina

Rep. Mahina Poepoe

House District 13

[EXTERNAL] Testimony: (Interim rule to prohibit the transportation of material that may Introduce the coconut rhinoceros beetle to Molokai)

From Daniel Gorsich <permafarm@gmail.com>

Date Sat 8/23/2025 4:51 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

We are farmers on Molokai, keeping destructive pests of this island is extremely important to us. It might be convenient to buy mulch or potted plants from other Islands, but we don't. We don't want to bring little fire ants or coqui frogs to Molokai,, and we don't want anyone bringing in coconut rhinoceros beetles or their eggs or larvae either.

Please support this interim rule

Robin and Dano Gorsich

Sent from my iPad

[EXTERNAL] Agenda IV.C.1 Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Robin Kaye <rkayelny@gmail.com>

Date Sun 8/24/2025 10:41 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

My name is Robin Kaye, and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

I live on the island of Lāna'i, where we have only recently discovered the coconut rhinoceros beetle's (CRB) attempt to establish a presence on this small, previously untouched island. Similar to the limited on-island resources on Lana'i to detect and eradicate new populations of this pest, it is critical that we do what it takes to prevent its introduction to Moloka'i. We must be vigilant to protect and preserve our threatened home islands.

Aloha,

Robin Kaye

--

Robin Kaye

P.O. Box 631313

Lana'i City, HI 96763

808-559-6124 (m)

rkayelny@gmail.com

[EXTERNAL] CRB

From Ruth Ann Howden <rahowden@gmail.com>

Date Mon 8/25/2025 12:04 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Ruth Ann Howden and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

"Freedom is something that dies unless it's used."
— Hunter S. Thompson

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Sharde Freitas <skmfreitas@gmail.com>

Date Sat 8/23/2025 10:44 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Sharde Freitas and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Sincerely,

Sharde Freitas

[EXTERNAL] Agenda 1V.C.1

From Stacy Helm Crivello <stacy.c63@gmail.com>

Date Sun 8/24/2025 8:49 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Others,

My name is Stacy Helm Crivello. I am a lifelong resident of Kalamaula, Molokai. I am testifying in strong support of the Interim Rule to prohibit the transportation of material that may introduce the CRB to the island of Molokai. Please accept your kuleana to prevent entry of CRB to Molokai. Mahalo.

[EXTERNAL] Testimony for BAB Meeting on 8i26

From Stephanie Easley <pseasley@hawaii.edu>

Date Sun 8/24/2025 2:48 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc christym <christym@rocketmail.com>

 1 attachment (117 KB)

CGAPS Testimony 08.26.25 Submitted.docx;

Aloha,

Attached please find our testimony for the Board of Agriculture and Biosecurity meeting on Tuesday, August 26.

Thank you,

Stephanie Easley

testimony for B



KO'OLAUPOKO HAWAIIAN CIVIC CLUB

Ko'olaupoko Hawaiian Civic Club
P.O. Box 664
Kāne'ohe, HI 96744

August 21, 2025

Board of Agriculture and Biosecurity
1849 Auiki Street
Honolulu, Hawaii 96819

Re: Testimony in Support of Efforts to Protect Moloka'i from the Coconut Rhinoceros Beetle (CRB)

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,,

The Ko'olaupoko Hawaiian Civic Club of O'ahu strongly supports efforts to protect the island of Moloka'i from the threat of the invasive Coconut Rhinoceros Beetle (CRB). As a Native Hawaiian civic organization, we are deeply concerned about the devastating impacts this pest can have on our natural environment, cultural practices, and local food systems.

Coconut trees and other native and Polynesian-introduced palms are an integral part of Hawai'i's landscape and lifeways. These trees provide food, shade, weaving materials, and cultural significance that connect us to our ancestors. The arrival of CRB to Moloka'i would endanger not only the health of the island's ecosystem but also the cultural resources that are vital to the identity and well-being of the Moloka'i community.

We commend the agencies, community organizations, and individuals who have worked tirelessly to monitor, contain, and control CRB infestations on O'ahu and other islands. However, Moloka'i's unique vulnerability calls for proactive, urgent measures. We encourage the Legislature to support increased funding and resources for prevention, monitoring, rapid response, and education to ensure that CRB does not take hold on Moloka'i.

Protecting Moloka'i from CRB is not only about safeguarding trees. It is about honoring kuleana to 'āina, protecting cultural traditions, and ensuring the resilience of our lāhui.

Mahalo for the opportunity to testify in **strong support** of these important measures.

Me ka ha'aha'a,

Charles Naumu, President
Ko'olaupoko Hawaiian Civic Club

The Ko'olaupoko Hawaiian Civic Club was established in 1937 and is one of the largest in the Association of Hawaiian Civic Clubs nationwide. Ko'olaupoko HCC is a not-for-profit community organization dedicated to preserving and perpetuating the history, heritage and culture of Native Hawaiians and providing leadership and scholarships. Its membership is open to people of Hawaiian ancestry and those who kāko'o.

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Queen Maile <alohahaloa@gmail.com>

Date Sun 8/24/2025 2:38 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Tanya Naehu, and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today.

Mahalo nui for your consideration of this matter.

Tanya Marie Mailelani Naehu

Kumu/Educator, Performer, Consultant, Hawaiian Cultural Arts

Owner/Co-founder of Ka Hale Hoaka | School of Hawaiian Knowledge

Program Director for Hui o Kuapā 501c3

Kūmimi, Moloka'i, Hawai'i
<https://www.kahalehoaka.com>
<http://www.huiokuapa.org/>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

I strongly urge you to **support the interim rule proposal** to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka‘i. This rule is a practical, low-cost, prophylactic mitigation strategy prevent cultural and economic devastation. Below I provide two key reasons for this support: first, to safeguard the substantial public investment in Moloka‘i’s unique and irreplaceable food and ecological systems; and second, to avoid the far greater costs and challenges of eradicating CRB once established

First, much state and federal funds have been invested in Moloka‘i’s food production system.¹ This growing system of integrated seed production, native species protection, and investment in irreplaceable endangered plants and animals cannot be risked with transferring the breeding ground of destructive CRB. Annually, invasive species cost \$21 billion in damages to agricultural product and ecosystem damage.²

Second, eradication of established CRB populations, even with early and rapid techniques, is difficult and costly.³ In FY2017, approximately \$3.0 billion in federal funds were spent managing invasive species across jurisdictional agencies, those agencies have seen a dramatic decrease in workforce and funding in the past six months.⁴

As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, Moloka‘i must be protected against the culturally and economically costly impacts of CRB.

Please support the interim rule proposal before you today.

Mahalo for the opportunity to testify, and for your work for Hawai‘i.

Sincerely,
Liz Wiggans

¹ Press Release: “Hirono Secures Several Key Priorities for Hawaii in Senate Agriculture Committee’s Farm Bill.” *Senator Mazie Hirono*, 10 May 2024. <https://www.hirono.senate.gov/news/press-releases/hirono-secures-several-key-priorities-for-hawaii-in-senate-agriculture-committees-farm-bill>.

² Sheridan, Kerry. “Invasive Species Cost the US \$21 Billion per Year, Study Finds.” *WUSF*, 4 Jan. 2022, WUSF Public Media. <https://www.wusf.org/local-state/2022-01-04/invasive-species-cost-the-us-21-billion-per-year-study-finds>.

³ United States Forest Service. *Forest Insect and Disease Leaflet 191*. U.S. Department of Agriculture, Apr. 2023.

⁴ Sheikh, Pervaze A. “Invasive Species: A Brief Overview.” Congressional Research Service, In Focus, IF11011, 26 Oct. 2018. <https://www.congress.gov/crs-product/IF11011>.



589 Maunaloa Highway || P.O. Box 650 || Kaunakakai, HI 96748
808-336-0387

August 22, 2025

Subject: Agenda IV.C.1 Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

Aloha mai kakou Board of Agriculture and Biosecurity,

I am Nani Kahinu, owner & operator of Na'ike LLC on the island of Molokai. My husband is the 4th generation of Kahinu's living in Kalamaula, Molokai & we started growing chili peppers to support our business and value added good sauce, Na'ike Shoyu Chili Pepper Blend since 2016. We actively started cultivating our homestead in 2021 & now grow staples such as kalo, banana, mango, coconut and other fruit trees. We faced many hardships in our soil biology & am proud to say in just July we harvested 150# of bananas! Farming is essential to our island's way of life being that so much is imported we must farm to supplement our meals.

I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today.
Mahalo nui for your consideration of this matter.

Mahalo for your time and understanding.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jamesie', with a long, sweeping horizontal line extending to the right.

Jamesie Nani Kahinu
Owner, operator
Na'ike's Kine DBA Na'ike LLC
naike.ltd@gmail.com



P.O. Box 1662
Honolulu, HI 96806

Mālama Learning Center is a non-profit organization based in West Oahu. Our mission is to inspire communities to care for Hawai'i by perpetuating conservation, culture, and sustainability through education.

TESTIMONY IN SUPPORT

Emergency Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle to the Island of Moloka'i

Department of Agriculture and Biosecurity
Plant Quarantine Branch
1849 Auiki Street, Honolulu, HI

Meeting Date: August 26 at 9 am

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity:

My name is Pauline Sato and on behalf of the Mālama Learning Center (MLC), I am testifying in Support of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i submitted by Kunani and Ipo Nihipali (Agenda item IV.C.1).

As a conservation education organization, MLC has been involved in direct community outreach and education about the Coconut Rhinoceros Beetle (CRB) on the island of O'ahu since 2016. Working closely with the Department of Agriculture's Coconut Rhinoceros Beetle Response Team, we reached out to Leeward O'ahu schools, educated teachers, ran community workshops, developed and aired student-made PSAs and professionally created video stories on television, and much more. (See our [website resources](#).) By the time we ended our USDA grant-funded projects in 2020, the CRB detections were very low and we were breathing a sigh of relief. Little did we know that the CRB populations were quietly growing and has since spread rapidly across the island of O'ahu and now detected and growing on all main inhabited islands of Hawai'i except for Moloka'i.

MLC has been working with educators and students on Moloka'i for the past two years on CRB prevention and coconut (niu) seed nut collection and eventual planting with the aim of preserving special varieties of niu that may cease to exist should the CRB get to the island. The community is beginning to mobilize, realizing that once the CRB becomes established, it will be too late. Unlike O'ahu, niu trees with nuts are abundant on Moloka'i, and they are used for food, water, and fiber on a daily basis. The wood and leaves are also heavily utilized. Niu is revered as a kupuna. Life without niu, especially the varieties that are connected to family stories and traditions, is unimaginable.

But we all know it does not take much imagination to see the destruction and devastation that will occur with CRB on Moloka'i. The Emergency Interim Rule that is proposed is one very important step toward controlling the main way that CRB may get to Moloka'i. It is proposed for just one year, which in the mean time, other strategies should be researched and employed. If friendly amendments are needed to move this forward, let that happen swiftly.

There is literally no time to waste. We respectfully and strongly urge you to support the passage of the interim rule proposal. Mahalo for the opportunity to provide testimony on this vitally important matter.

Aloha,

Executive Director



The Senate Ka 'Aha Kenekoa

STATE CAPITOL
HONOLULU, HAWAII 'I 96813

August 25, 2025

The Honorable Sharon Hurd, Chair
Board of Agriculture and Biosecurity
Department of Agriculture and Biosecurity
1428 South King Street
Honolulu, Hawai'i 96814

Re: Testimony in Strong Support – Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle (CRB) to Moloka'i

Aloha Chair Hurd and Members of the Board,

Mahalo for the opportunity to provide testimony in **strong support** of the proposed interim rule to prohibit the transportation of materials that may introduce the Coconut Rhinoceros Beetle (CRB) to the island of Moloka'i.

As the State Senator for District 7 which includes Hāna, East & UpCountry Maui, Moloka'i, Lāna'i, Kaho'olawe and Molokini, I cannot overstate the urgency of this action. The CRB poses a serious threat not only to our native and cultural resources, but also to the fragile agricultural economy of Moloka'i. Its spread would bring devastating and irreversible consequences to our community, culture, and way of life.

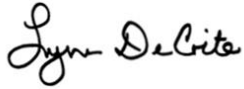
The CRB attacks coconut trees, iconic and culturally significant symbols in Hawai'i, as well as other important plants such as *maia* (banana) and *kalo* (taro). These species are vital to Hawaiian traditions, identity, ecology, and economy. Recent detections of CRB on Hawai'i Island, Maui, and Lāna'i show how easily this pest can spread through the movement of mulch, compost, and plant materials between islands.

Moloka'i remains the only main Hawaiian island not yet impacted by CRB. With limited local capacity to detect, contain, or eradicate an infestation, **prevention is our strongest line of defense**. Once established, the beetle would be nearly impossible to eradicate and extremely costly to manage. This interim rule is not only prudent, it is essential to protect Moloka'i's agricultural integrity and cultural heritage.

I respectfully urge the Board to adopt the proposed interim rule without delay. In doing so, you will be taking a critical step to safeguard not only Moloka'i, but also Hawai'i's broader food security, cultural practices, and environmental sustainability.

Mahalo Nui for the opportunity to provide testimony on this urgent matter.

Respectfully with Aloha,



Lynn DeCoite

Chair, Senate Committee on Economic Development and Tourism.
Hawaii State Senate
7th District

Senator Lynn DeCoite
Assistant Majority Floor Leader

Chair, Senate Committee on Economic Development and Tourism (EDT)

District 7: Makawao (Sprecklesville, Pukalani, Makawao, Olinda, Pulehu, Kula, Waiohuli, Keokea, Ulupalakua, portion of Keoneoio, Paia, Lower Paia, Haiku, Pauwela, Ulumalu, Huelo, Kailua), Wailuku (portion of Kahului), Hana (Keanae, Wailua, Nahiku, Hana, Hokuula, Hamoa, Puuki, Haou, Muolea, Kipahulu, Kaupo); Islands of

Kaho'olawe, Molokini, Lana'i, Moloka'i
State Capitol, Room 230, Honolulu, HI 96813
Phone: (808) 587-7225 Fax: (808) 587-7230
Email Address: sendecoite@capitol.hawaii.gov

Testimony

Nākai‘elua Villatora
Ho‘oilina Hawai‘i,
Mokupuni ‘o Kaua‘i, Moku ‘o Kona, Ahupua‘a ‘o Kalāheo

Agenda Item : IV.C.1 Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Moloka‘i

Aloha ‘o Nākai‘elua Villatora ko‘u inoa, no ka mokupuni ‘o Kaua‘i mai au. I am the Po‘o Pani (Vice President) of E Ola Kākou Hawai‘i ‘Ahahui Waiwai ‘Ole (non-profit organization) based on the mokupuni of Kaua‘i and I am the Lead Organizer of Niu Ola Kaiāulu Action Initiative, a community based and led Coconut Rhinoceros Beetle (CRB) response effort on Kaua‘i. I have physically witnessed the devastating effects of CRB and the reactive response measures to “manage” CRB here on Kaua‘i. I am in support of the lāhui on Moloka‘i to demand that the Board of Land and Natural Resources uphold their fiduciary duties to protect and preserve all natural resources that we as ho‘oilina Hawai‘i have inherited by our kūpuna and our ‘āina. The prohibiting of transportation of potential breeding materials to Moloka‘i can create a pu‘uhonua for niu. CRB poses a detrimental risk to our waiwai Hawai‘i; mea kanu kūpuna niu, critically endangered loulu (pritchardia) and other plant species, wai, ‘āina, hana no‘eau and mo‘omeheu Hawai‘i. Stricter biosecurity protocols should be in place for all of our Pae ‘Aina Hawai‘i to preserve our kumu waiwai for the next seven to twenty-one generations of kanaka Hawai‘i.

CRB is a highly destructive and an adaptive invasive species of scarab beetle that feeds on sap/liquid sugar from fresh young coconut leaf fronds and other fleshy plants. They are capable of damaging the entire structure of the tree by feeding and habitation. CRB has already targeted niu, loulu, hala, kalo, kō, mai‘a, papaya, pineapple and zucchini on O‘ahu, Maui, Kaua‘i and Moku ‘o Keawe. Reactive measures like the use of neonic injections and aerial pesticide sprays have created greater risk to our environment from ‘āina, wai to kai and the safety and well being of our people. I demand that the Board uphold their duties to kāko‘o our kanaka Hawai‘i that are perpetuating the ways of our kūpuna through mālama ‘āina.



HOUSE OF REPRESENTATIVES

Hale o nā Luna Makaʻāina

STATE OF HAWAII

STATE CAPITOL

415 SOUTH BERETANIA STREET

HONOLULU, HAWAII 96813

August 26, 2025

Board of Agriculture and Biosecurity

Hawaiʻi Department of Agriculture

1428 South King Street

Honolulu, HI 96814

Agenda Item IV.C.1 Relating to a Request for Review of the Petition From Kunani and Ipo Nihipali to Initiate Administrative Rule Making to Implement an Interim Rule Pursuant to Hawaii Revised Statutes §150A-9.5

Aloha Chair Hurd and Board Members,

Please accept this testimony in support of the petition which seeks to implement interim rules prohibiting the movement of coconut rhinoceros beetle (CRB)-host materials to the island of Molokai. I would also like to address several of the concerns raised by the Plant Quarantine Branch (PQB) in its response to the petition.

In its response, The PQB acknowledges that quarantine restrictions are preventative in nature, and not absolute. It is important to recognize that prevention, in any biosecurity context, is never absolute, but that is not a reason to avoid taking action. We wear seatbelts to prevent injury or death in car accidents, understanding that they are not a guarantee. The fact that seatbelts do not eliminate all risk does not diminish their value. In fact, it underscores the importance of using every available measure to reduce risk where possible.

The same principle applies here. The fact that the proposed interim rules may not eliminate CRB risk entirely should reinforce, not undermine, the need for strong, precautionary measures. It is precisely because prevention cannot be guaranteed that it must be maximized.

The point that CRB may have originally entered Hawaiʻi as a hitchhiker on an aircraft does not justify the continued, largely unregulated movement of high-risk materials such as mulch, compost, and potted plants to Molokai. On the contrary, given the well-documented lack of enforcement at entry points on Molokai, it is essential to minimize the potential pathways for introduction until they can be reliably managed. This does not need to take years. With adequate

Representative Mahina Poepoe
415 S. Beretania Street, Room 331
Honolulu, HI 96813
(808) 586-6790 reppoepoe@capitol.hawaii.gov

political will, departmental, and administrative commitment, stronger measures to meaningfully reduce CRB risk to Molokai could be implemented in a matter of weeks or months.

Regarding the concern that the proposed rules may potentially violate the Commerce Clause by restricting certain commodities without providing treatment exemptions, it is important to emphasize that the proposed restrictions are grounded in legitimate, science-based biosecurity considerations. At present, Molokai lacks the necessary treatment, fumigation, and quarantine capabilities to safely manage these commodities. In the past, the U.S. Supreme Court has upheld state-level environmental and quarantine protections when they were narrowly tailored, grounded in science, and in the public interest. The petition and proposed interim rules meet those criteria. Therefore it is extremely unlikely that a suit alleging a violation of the Commerce Clause will be brought, and even less likely that such a claim would succeed.

Moreover, the proposed rules are temporary in nature. During its limited duration, permanent solutions should be implemented to enable the safe movement of affected commodities through appropriate treatment, inspection, and quarantine protocols, both prior to and following entry. Support should also be directed toward developing commercial composting, mulching, and plant nursery facilities on Molokai, which would reduce reliance on importing high-risk materials as well as support economic development.

This petition emerged from the grassroots level of the Molokai community. While it may not be perfect, its intent is clear, and its concerns are valid. The question should not focus on whether or not the petition is flawless, but rather how we can urgently build and implement the biosecurity systems necessary to preserve one of the last remaining CRB-free areas in the state.

If the proposed interim rules are not accepted, what concrete, equally or more effective, timely alternatives and commitments is the department putting forward to prevent the introduction of CRB to Molokai?

CRB has spread exponentially across the state, with a clear trend of increasing establishment once detected. Even goods inspected and cleared by the DAB have previously served as vectors for pests reaching Molokai. Molokai now represents a critical opportunity as a stronghold for preserving agricultural and traditional resources that are being decimated elsewhere by CRB. However, once CRB is introduced on Molokai, eradication will be virtually impossible.

We've seen the same pattern time and again. We wait, the problem worsens, and when it finally reaches a crisis point, we say it's too late, too expensive, too complex to manage. That approach is unacceptable. A higher, more protective standard is not only warranted but urgently needed to protect Molokai, which in turn helps to protect the entire state from complete loss.

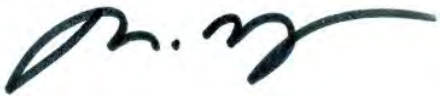
In biosecurity, where consequences are often irreversible and cumulative, the burden of proof must fall on those asserting safety, not those advocating caution. Exclusion of materials like

bare-root plants, cuttings, or gravel on the grounds that they have not been proven CRB vectors is based on a reactive standard of evidence. I urge the DAB to adopt a precautionary rather than reactive approach, which aligns with recognized biosecurity best practices and industry standards.

The Department must also consider its constitutional obligations under Article XII, Section 7 of the Hawai‘i State Constitution, which requires the State to “protect all rights, customarily and traditionally exercised for subsistence, cultural, and religious purposes” by Native Hawaiians.

The introduction of CRB to Molokai directly threatens native ecosystems and traditional cultural, subsistence, and agricultural practices. Niu, kalo, mai’a, ulu, hala, loulou and other culturally and ecologically critical plants vital to Native Hawaiian subsistence and cultural practices are threatened by CRB. Damage caused by CRB to these resources could be permanent, and such harm may constitute a violation of protected traditional and customary rights. Refusal to take adequate preventative action in the face of credible biological threats, despite knowing the risks, and despite having every opportunity to take action could be interpreted as a dereliction of ones constitutional duty.

In conclusion, I strongly urge the Board to adopt the interim rules proposed by this petition. Following adoption of the interim rules, I urge the DAB to work collaboratively with the community, the petitioners, and relevant agencies and stakeholders to expeditiously develop and implement permanent and effective protective measures that reflect the seriousness of the threat CRB poses to Molokai.



Representative Mahina Poepoe

Hawai‘i State House of Representatives, District 13

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jana Ireijo <janaireijo@gmail.com>

Date Mon 8/25/2025 4:58 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Jana Ireijo, and I'm writing in strong support of the Interim Rule to stop the transport of materials that could bring the coconut rhinoceros beetle (CRB) to Moloka'i.

CRB threatens not just coconuts, but also important plants like loulu, maia, and kalo. We've already seen how quickly it spreads between islands.

Moloka'i is still CRB-free, but with limited resources to fight an outbreak, it's critical we act now to prevent one. This temporary rule gives the island a better chance.

Mahalo for your time and consideration.

Jana

Artist

Vanishing Murals

www.vanishingmurals.com

IG: [@janaireijo](https://www.instagram.com/janaireijo)

(805) 291-9405

"Let the murals vanish so our endangered species do not."

[EXTERNAL] Coconut Rhinoceros

From Walter Ritte <walter@ritte.org>

Date Mon 8/25/2025 6:53 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Hawaii Board of Biosecurity (and Agriculture),

My name is Walter Ritte and I am in strong support of creating an Interim Rule to prohibit the transportation of materials that may introduce the CRB TO THE ISLAND OF MOLOKAI.

MOLOKAI'S FOOD SECURITY IS BEING THREATENED BY THE COCONUT RHINOCEROS.

It is your new mandate and kuleana to kokua in anyway you can by doing everything in your power to prevent this bug from getting to Molokai.

Walter Ritte

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jacqueline (Poppy) Hudson <raphudson@gmail.com>

Date Mon 8/25/2025 7:49 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board,

I am testifying in **strong support** of the Interim Rule to prohibit the transport of material that may introduce the Coconut Rhinoceros Beetle (CRB) to Moloka'i.

The reasons given to oppose this rule do not hold up. Even if it only reduces risk, that is still essential protection. This rule is not about commerce—it is about safeguarding Moloka'i's agriculture, culture, and ecosystems.

CRB threatens our niu, loulou, maia, kalo, and more. We have already seen how quickly it spreads between islands. Moloka'i, the last main island not yet impacted, does not have the resources to fight an infestation. Prevention is our only real chance.

I urge you to adopt this interim rule and give Moloka'i the protection it needs and deserves.

Mahalo nui loa,

Jacqueline (Poppy) Hudson

raphudson@gmail.com

(808) 269-0295

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Gregory O'Shea <oshea.greg@gmail.com>

Date Mon 8/25/2025 4:02 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc Keomailani H. Hirata <Keomailani.Hirata@mauicounty.us>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Gregory O'Shea and I am testifying to offer my SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Molokai.

Molokai stands at a critical juncture. The Coconut Rhinoceros Beetle (CRB), already entrenched on O'ahu, and on it's way to fixed in place on Kaua'i, Maui, and West Hawai'i Island, has devastated thousands of palms, altered landscapes, and disrupted both ecological and cultural resources. To date, Molokai remains free of this invasive pest—but only if we act decisively can it remain so.

Unlike the other Hawaiian Islands, Molokai has successfully resisted unchecked development and the mass visitor industry. Its people have fought hard to preserve a way of life rooted in subsistence, culture, and the careful stewardship of 'āina. The loss of healthy palms on Moloka'i would represent far more than just economic harm—it would endanger cultural practices, subsistence uses, and the very landscape that the island's people have worked so hard to protect from outside exploitation.

This proposed rule—a one-year temporary stop on incoming materials most likely to carry CRB—is a modest, measured, and entirely reasonable safeguard. Yet the Department of Agriculture and Biosecurity staff have chosen to oppose it. Their reasoning is not only short-sighted but also factually incorrect. To downplay the real and present risk to Molokai in the name of convenience or bureaucratic efficiency is irresponsible at best, and destructive at worst.

Molokai deserves better. The island has made clear its desire to remain self-sustaining and culturally grounded, and the state has an obligation to uphold that vision by protecting Molokai from preventable harm. Rejecting this rule now all but ensures the eventual arrival of CRB, with irreversible consequences.

Mahalo!

Gregory O'Shea

Kaunakakai, Molokai

[EXTERNAL] Regarding the Interim Rule to Prohibit the Transportation of Material that may introduce CRB to the island of Moloka'i

From Ila Nako <in6807@princeton.edu>

Date Mon 8/25/2025 11:26 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

My name is Ila P. Nako and I am testifying today, requesting that the Board of Agriculture and Biosecurity and/or the Department of Agriculture and Biosecurity implement an interim rule under Section 150A-9.5 of the Hawaii Revised Statutes (HRS), prohibiting the transportation of material that may considered the Coconut Rhinoceros Beetle (CRB) to the island of Molokai.

The introduction of CRB to Molokai would detrimentally affect the cultural, ecological, and agricultural landscape of Molokai, and implementing said rule would ensure protections for the island's resources from the CRB, which has been found on majority of the remaining Hawaiian.

Molokai has been able to maintain much of its natural balance, and preventing CRB from arriving is far easier and less costly than trying to fight it later. Protecting these resources now is critical.

Sincerely,
Ila Nako

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jayelyn F <jayelyn.finn@gmail.com>

Date Mon 8/25/2025 7:32 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Jayelyn Finn-Imamoto and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

[EXTERNAL] SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jenah Yamamoto <missgypsyone@gmail.com>

Date Tue 8/26/2025 2:34 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Jenah Yamamoto** and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Jenah Yamamoto

e| MissGypsyOne@gmail.com

c| +14157489442

www.GypsyOne.com

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jocelyn Doane <jocelynmdoane@gmail.com>

Date Mon 8/25/2025 7:25 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha kākou,

I am emailing to urge you to pass the interim rule to prohibit transportation of material that risks CRB introduction to the island of Molokai.

We have seen the devastating impacts of the coconut rhinoceros beetle (CRB) across Ka Pae 'Āina, including vast areas on O'ahu that literally look like niu (coconut) and loulu graveyards.

We know how easily CRB spreads between our islands. New detections have occurred on Hawai'i Island, Maui, and even now, Lāna'i.

As the last main island where we have not yet detected CRB, we must take swift and meaningful action to protect the iconic niu groves on Moloka'i, as well as the other plants and crops that the subsistence communities on Moloka'i rely on to supplement their incomes, for food, and to exercise their traditional and customary practices.

Moloka'i is not just another island in Hawai'i. It is an island where with the highest concentration of Native Hawaiians. A place where Native Hawaiian traditions and customs are actively practiced and evolving. We must protect its resources in order to protect the culture associated with those resources, not only for its people but for all of the people of Hawai'i.

I strongly urge you to SUPPORT the interim rule proposal before you.

Mahalo,

Jocelyn Doane

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Jonathan Simonds <jonathan.s.simonds@gmail.com>

Date Mon 8/25/2025 10:27 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair and Members of the Board,

I am writing from Hawaii Island where the handful of CRB detections have farmers across the island at the edges of their seats wringing the hands hoping and praying that it doesn't come our way because of the devastation it would bring to our farms. Farmers have just planted coconut trees that have to be in the ground for years before they will bear fruit, hoping their investments will still pay off.

Molokai doesn't have to go through this.

Our islands make us unique. This can present challenges if we fight it, trying to be like the continent and drive our barges like they drive semi trucks. But if we embrace it and use our natural isolation like the asset it is, we can grow things that are nearly impossible elsewhere in the world and with fewer chemicals. Let's let Molokai lean in to their island status and plant their niu free of CRB.

Sincerely,
Jonathan Simonds
Hilo, HI 96720

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From K G <kgunderson91@gmail.com>

Date Tue 8/26/2025 3:47 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Ku'ulei Gunderson, and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

Ku'ulei

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Kalei Stormcrow <kaleiheanaapohaku@gmail.com>
Date Tue 8/26/2025 1:23 AM
To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Kaleiheana Stormcrow** and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.



Testimony Before The
Hawai'i Department of Agriculture and Biosecurity
Board of Agriculture and Biosecurity
IN SUPPORT OF Agenda Item IV.C.1

Interim Rule to Prohibit the Transportation of Material that May Introduce CRB to Molokai

August 26, 2025, 9:00 a.m., Plant Quarantine Branch, Honolulu

We are Olan Leimomi Fisher and Kevin Chang, Kua'āina Advocate and Executive Director, respectively, testifying on behalf of [Kua'āina Ulu 'Auamo \(or KUA\)](#). "Kua'āina Ulu 'Auamo" stands for "grassroots growing through shared responsibility," and our acronym "KUA" means "backbone." **Our mission is to connect and empower communities to improve their quality of life through the collective care for their biocultural (natural and cultural) heritage, serving as a "backbone organization" that supports creative and community-driven solutions to problems stemming from environmental degradation.** Hawai'i's biocultural resources continue to be negatively impacted by political, economic, and social changes, and the increasing dangers of climate change make fostering and empowering resilient communities acutely critical.

Currently KUA supports three major networks of: (1) over 40 mālama 'āina (caring for our 'āina or "that which feeds") community groups collectively referred to as E Alu Pū (moving forward together); (2) over 60 loko i'a (fishpond aquaculture systems unique to Hawai'i) and wai 'ōpae (anchialine pool systems) sites in varying stages of restoration and development, with numerous caretakers, stakeholders, and volunteers known as the Hui Mālama Loko I'a ("caretakers of fishponds"); and (3) the Limu Hui made up of over 50 loea (traditional experts) and practitioners in all things "limu" or locally-grown "seaweed." **Our shared vision is to once again experience what our kūpuna (ancestors) referred to as 'ĀINA MOMOMA – abundant and healthy ecological systems that sustain our community resilience and well-being.**

KUA strongly supports Agenda Item IV.C.1 as a necessary, proactive defense against CRB as called for by Molokai community leaders, and an essential safeguard to ensure 'āina momona on Molokai for present and future generations.

Communities we work with are intimately familiar with the impacts that invasive species can have on every aspect of life in Hawai'i — jeopardizing native ecosystems, food security, cultural practices, public health, fire safety, climate resiliency, economy, and overall quality of life.

Devastation caused by the Coconut Rhinoceros Beetle (CRB) on five of the main Hawaiian Islands is hard to ignore, and the impacts may also be irreversible once CRB are established. **Loss of a significant cultural and food resources like niu (coconut), ulu (breadfruit), mai'a (banana), kalo (taro), hala (pandanus), and others would erode cultural practices and resources that Native Hawaiian and local communities cherish, perpetuate, and regenerate in furtherance of cultural integrity, food self-sufficiency, and connections to 'āina and each other.**

Further, we do not agree with the reasons given by staff to reject the temporary rule, which could be perceived as indolent. First, reducing the possibility of CRB infestation in Molokai is reason enough to support this rule, especially with recent populations found on Lānaʻi as well. Second, our understanding of the Commerce Clause is to prevent laws that discriminate against or excessively burden interstate commerce. We do not see this proposed interim rule as discriminating against any out-of-state products in favor of in-state products – it is an *emergency* rule designed to prevent the spread of CRB on Molokai. Third, the argument that this rule would cause “large swaths of commodities” to be banned outright and without careful consideration seems to be a vast overstatement. Please do not ignore the fact that Molokai is especially vulnerable with little on-island resources to detect and eradicate CRB. Any “commodities” that do not care about (or even want to consider) this real vulnerability should not be encouraged to conduct business on the island (or any Hawaiian Island), anyway. **Continued inaction upholding the status-quo without *any* protections, or even *temporary* protections, seems irresponsible when considering the continued, rapid spread and devastation across our islands.**

Organizations and initiatives in our networks have long dedicated considerable energy and resources to educate the public to act in defense of our islands from invasive species. Several leading Molokai voices among them. Despite community efforts to raise awareness, centralized policy (or lack of policy) which fails to consider the voices of communities closest to the impact *themselves* overlooks the power of a collaborative citizenry and community. People “on the ground” are not only the most knowledgeable about what they actually need, but are also the most impacted by the active *mistakes* of others (like their experience with gorilla ogo and the recent introduction of CRB on Lānaʻi). **We implore you to listen to the people of Molokai and take *real action* to support our biosecurity systems by supporting this interim rule *before it is too late*.** ‘Āina Momona is not achievable without prioritizing the urgent protection from these invasive pests to protect our precious biocultural resources and those that intimately love and care for them.

Mahalo nui loa for considering our testimony in support. Please **SUPPORT** the interim rule proposal before you today.

Aloha ‘Āina Momona no nā kau ā kau.

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Melissa Tomlinson <mel_tomlinson@ymail.com>

Date Tue 8/26/2025 4:49 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

i realize i have missed the written testimony deadline, but i cannot testify on zoom today as i will be working at that time. i stand in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. As someone who has been witnessing the decimation of neighboring islands in Hawai'i brought by the introduction of CRB via imports it would behoove the most logical, appropriate, and necessary step in protection would be to stop allowing them to get imported. Protecting Moloka'i from the harm these invasives cause is of upmost importance, period. Anyone who does not support that, is in someway profiting by exploitation. We have seen the harm they cause and the futures they are consuming. Please prohibit materials that could bring CRB to Moloka'i!

Mahalo,

Melissa Tomlinson
Lafayette, CA

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Merlyn Ruddell <peacefulkauai@gmail.com>

Date Tue 8/26/2025 5:47 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Merlyn Ruddell, and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i. I live on Kauai, and CRB is out of control here in just the two short years since it first was accidentally imported, reportedly in contaminated soil sold in bags that arrived from Oahu!

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by

repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

Mahalo nui for taking action on this critical issue!

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With best wishes,

Merlyn W. Ruddell 

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Mialisa Otis <mialisa808@gmail.com>

Date Mon 8/25/2025 8:39 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha board members,

As a farmer in Waimanalo, I have seen the destruction that the CRBs have done to nearby nurseries. I monitor my farm very carefully because I grow kalo, papaya, banana and hala - the very plants that CRBs feast on.

When I think of Moloka'i, I think of sustainability. Moloka'i has effectively fought off the invasion of commercialism and tourism. It's not about how the island looks with its cultural coconut groves and Lo'i, it's about the heart.. the heart of being self-sufficient.. the heart of the people.. the heart of the Lā'au.

Please save Moloka'i from the infiltration of the most destructive pest to the people and 'Āina.

Mahalo,

Mialisa Otis

[EXTERNAL] Regarding the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the island of Moloka'i

From Kahakuhailoa Poepoe <backupkahaku@gmail.com>

Date Mon 8/25/2025 9:43 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha nui,

I am Kahaku Poepoe from the island of Moloka'i, where my family comes from for many generations, and I am submitting testimony today requesting that the Board of Agriculture and Biosecurity and/or the Department of Agriculture and Biosecurity (DAB) adopt an interim rule under Section 150A-9.5 of the Hawai'i Revised Statutes (HRS) that prohibits the transportation of material that may contain Coconut Rhinoceros Beetle (*Oryctes rhinoceros*) to the island of Moloka'i.

Moloka'i is the only main Hawaiian island that is currently void of the Coconut Rhinoceros Beetle, and it is crucial that we keep it that way, because, as seen on other islands, once said species is introduced they tend to spread rapidly and kill the plants they burrow in, which is what will inadvertently bring negative effects to Moloka'i's cultural, ecological, and agricultural landscape if the CRB were allowed to be introduced. CRB are known primarily to attack coconut trees, which is not only a vital resource to the Hawaiian people, but also a symbol of Moloka'i itself as we are home to one of Hawaii's most famous coconut groves planted by Lot Kamehameha V himself, known by his name "Kapuāiwa". Along with coconuts, CRB are also known to attack culturally important plants such as hala (pandanus), taro, sweet potato, and bananas, and also ecologically important endemic species such as our native loulu palm, which is already at risk. It is known that CRB is travelling interisland primarily through agricultural materials being sold in department stores, such as the recent example of CRB being found on Lāna'i, and by continuing to allow said materials to be shipped to Moloka'i, you are allowing for the spread of an invasive species that will bring detrimental changes to our island.

I ask that you hear my plea, and consider implementing an interim rule that will protect Moloka'i and its resources from the potential introduction of an invasive species that is currently plaguing Ko Hawai'i Pae 'Āina from the island of Hawai'i all the way to Kaua'i. I also thank the Board of Agriculture and Biosecurity and the Department of Agriculture and Biosecurity for hearing this issue, and for their continued efforts to protect Hawai'i by upholding the proper biosecurity measures.

'O wau iho nō me ka ha'aha'a,
Na Kahakuhailoa Poepoe

[EXTERNAL] Regarding the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the island of Moloka'i

From Kira Kai Yamazaki-Gray <kyamazakigray@gmail.com>
Date Mon 8/25/2025 9:47 PM
To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha nui,

I am Kira Kai Nā'eha Yamazaki-Gray and I am submitting testimony today requesting that the Board of Agriculture and Biosecurity and/or the Department of Agriculture and Biosecurity (DAB) adopt an interim rule under Section 150A-9.5 of the Hawai'i Revised Statutes (HRS) that prohibits the transportation of material that may contain Coconut Rhinoceros Beetle (*Oryctes rhinoceros*) to the island of Moloka'i.

Moloka'i is the only main Hawaiian island that is currently void of the Coconut Rhinoceros Beetle, and it is crucial that we keep it that way, because, as seen on other islands, once said species is introduced they tend to spread rapidly and kill the plants they burrow in, which is what will inadvertently bring negative effects to Moloka'i's cultural, ecological, and agricultural landscape if the CRB were allowed to be introduced. CRB are known primarily to attack coconut trees, which is not only a vital resource to the Hawaiian people, but also a symbol of Moloka'i itself as we are home to one of Hawaii's most famous coconut groves planted by Lot Kamehameha V himself, known by his name "Kapuāiwa". Along with coconuts, CRB are also known to attack culturally important plants such as hala (pandanus), taro, sweet potato, and bananas, and also ecologically important endemic species such as our native loulu palm, which is already at risk. It is known that CRB is travelling interisland primarily through agricultural materials being sold in department stores, such as the recent example of CRB being found on Lāna'i, and by continuing to allow said materials to be shipped to Moloka'i, you are allowing for the spread of an invasive species that will bring detrimental changes to our island.

I ask that you hear my plea, and consider implementing an interim rule that will protect Moloka'i and it's resources from the potential introduction of an invasive species that is currently plaguing Ko Hawai'i Pae 'Āina from the island of Hawai'i all the way to Kaua'i. I also thank the Board of Agriculture and Biosecurity and the Department of Agriculture and Biosecurity for hearing this issue, and for their continued efforts to protect Hawai'i by upholding the proper biosecurity measures.

'O wau iho nō me ka ha'aha'a,
Na Kira Kai Nā'eha Yamazaki-Gray

[EXTERNAL] SUPPORT for Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Olan Leimomi Fisher <olan@kuahawaii.org>

Date Mon 8/25/2025 10:40 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Cc KUAHAWAII-Kevin <kevin@kuahawaii.org>

 1 attachment (163 KB)

KUA Support Item IV.C.1 Rule CRB Molokai HDOAB 08.26.2025.pdf;

Aloha mai kākou,

Please find Kua'āina Ulu 'Auamo's (KUA's) testimony in **SUPPORT** of Agenda Item IV.C.1, and let us know any questions.

Mahalo nui loa,

Olan

Olan Leimomi Fisher (she/her/'oia), Esq.

Kua'āina Advocate

olan@kuahawaii.org

Kua'āina Ulu 'Auamo (KUA)

grassroots growing through shared responsibility

www.kuahawaii.org

[EXTERNAL] NO CRB ON MOLOKAI

From William W. Steiner <wwmsteiner@gmail.com>

Date Mon 8/25/2025 5:36 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Dr. William Moekahi Steiner, former Dean of CAFNRM UH Hilo and former Director of USGS-BRD-PIERC now retired. I now work as Founder and General Manager of Hawaii Oil Seed Producers (HOSPRO), a 501(c)5 ag cooperative of 42 small farmers seeking to establish the first commercial vegetable oil system in the Islands using hybrid oil palms grown on underutilized former sugar cane land. Our proof-of-concept growing dwarf palms with increased fertility and drought tolerance produced an average of 600 gallons/acre, 10x that of soybeans on the mainland. This new crop system has great potential for new industries fostering new businesses and jobs and a new bioeconomy in the face of rising oceans and loss of tourism. I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

I respectfully and strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

William "Bill" Steiner, Ph.D.
Hawaii Oil Seed Producers

--

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Dr. Jmi Lilinoe Asam <drasam@pdishawaii.com>

Date Tue 8/26/2025 8:49 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board,

My name is Dr. Jmi Asam, and I live on Oahu but my true home is on Molokai. This 'āina is my home, my heart, and my responsibility. I love it here.

I'm writing in strong support of the Interim Rule to prohibit the transportation of material that may bring the Coconut Rhinoceros Beetle (CRB) to Moloka'i. Even if this rule only reduces the risk, that matters. For Moloka'i, every bit of protection counts. Once CRB arrives, there is no undoing it—and the losses to our culture, our food systems, and our fragile ecosystems would be immeasurable.

Niu is more than a tree to us—it is family, it is ancestry, it is connection. So are kalo, maia, and loulou. To lose them would be to lose part of ourselves. We already see what's happening on other islands: Hawai'i Island, Maui, Lāna'i. We know how quickly CRB spreads, and we know how impossible it is to contain once it takes hold.

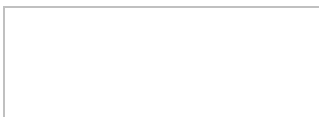
Moloka'i is the last major island still free from CRB. We don't have the resources or infrastructure to fight it if it comes. That's why we need this rule now—for prevention, for protection, for the future of this 'āina and the generations who will live here after us.

With deep respect and urgency, I ask you to pass this interim rule. Please stand with Moloka'i, and help us keep our island safe.

Mahalo nui loa,
Jmi Lilinoe Bassett Asam, D.M.D.

Prosthodontist

Pacific Dental & Implant Solutions
4211 Waiālae Ave, Suite 102
Honolulu, Hawaii 96816
P: 808.737.6150
www.PDISHawaii.com



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[EXTERNAL] Crb Molokai

From Kamuela Akeo <kakeo3@hawaii.edu>

Date Tue 8/26/2025 8:24 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Dear BOA,

I think the halt of the importation of hazardous materials carrying CRB is important and I recommend the Board consider the measure to protect Molokai.

Kamuela Akeo

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Robin Asam <robinasam@gmail.com>

Date Tue 8/26/2025 8:45 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is **Robin Asam** and I am a homeowner on Molokai. I love this `aina. Please protect us.

Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i, and I am testifying in **strong support** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the Coconut Rhinoceros Beetle (CRB) to Moloka'i.

Rejecting this rule on the basis that it only reduces—but does not eliminate—the risk of CRB introduction is misguided. Even partial risk reduction is critical when the stakes are as high as they are for Moloka'i. The Commerce Clause is intended to prevent discrimination against interstate commerce. This interim rule does no such thing; it does not favor in-state over out-of-state products. Its purpose is to protect Moloka'i from the devastating ecological, cultural, and economic harm that CRB would cause. Moreover, adopting this temporary measure in no way obligates the Board to enact future blanket bans on commodities.

We already know the dangers CRB poses—not just to niu, which holds deep cultural significance, but also to loulu, maia, kalo, and other vital crops and plants. We also know how easily this pest spreads through the movement of mulch, green waste, and other infested materials. The repeated detections on Hawai'i Island, Maui, and most recently Lāna'i, show how real this threat is.

If CRB were to become established on Moloka'i, the impacts on the island's agriculture, cultural practices, and fragile ecosystems would be severe. As the last major Hawaiian island still free from CRB—and with limited resources to detect or eradicate new infestations—Moloka'i urgently needs this enhanced, temporary protection.

For these reasons, I respectfully but strongly urge you to **support the proposed interim rule**. Mahalo nui for your consideration.

Sincerely,
Robin Asam

[EXTERNAL] CRB Petition for Interim Rule

From Rogerene Arce <Rogerene.Arce@co.maui.hi.us>

Date Tue 8/26/2025 10:39 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Board of Agriculture and Biosecurity Members,

I am a resident of Molokai and providing testimony as the Director of the County of Maui Department of Agriculture. The County of Maui Department of Agriculture is in support of the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai. Since the confirmed findings of CRB in Kihei in 2023, the Maui County Department of Agriculture established the CRB Working Group of which it administers to prevent CRB coming to Molokai and Lana'i and to stop it's spread on Maui. The CRB Working Group is a collective of agencies with the Maui County Department of Agriculture and include representation from the Hawaii Department of Ag. and Biosecurity, the UH CRB Response Team, the Maui and Molokai Invasive Species Committees, and the County of Maui Department of Environmental Management's Environmental Protection & Sustainability Division.

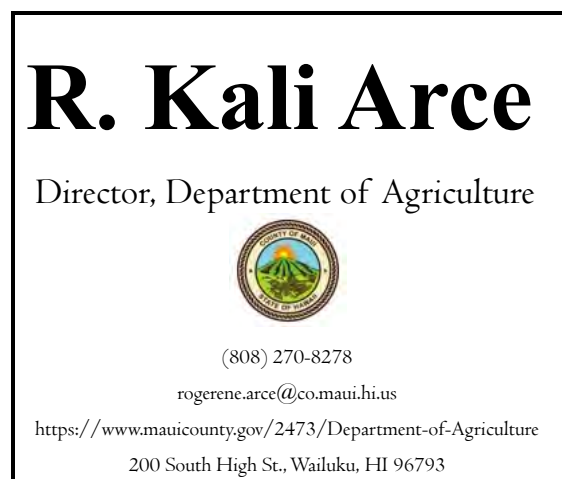
Maui Department of Agriculture recognizes that Molokai does not have HDOAB inspectors. The CRB Working Group provides added efforts in the prevention and awareness of CRB through educational campaigns, CRB identification and awareness workshops and installation of monitoring traps including in the Kalawao County in Kalaupapa. The County of Maui Department of Environmental Management's Environmental Protection & Sustainability Division is supporting soil remediation for farmers to reduce need to bring in compost.

CRB would greatly impact Molokai's food security. Niu is cultivated by our Hawaiian Homestead farmers on Molokai for food security and diversifying our agriculture. Other CRB host plants include banana, sugarcane, ulu,

and, pineapple which are grown by many residents as food sources that support our subsistence and sustainable lifestyle. Niu is culturally important as well as evident of the 160 year plus old Kapuaiwa Grove. CRB would also greatly change the ecosystem including the remote locations such as Kalaupapa and the inaccessible shores on the North side plateaus. Hala, a CRB host plant also grows in these remote locations.

The interim rule will provide an extra barrier to prevent CRB entering into Molokai. It is the only island in the state that is CRB free and it's vital it be kept that way. I respectfully ask the HDOAB and Board of Agriculture support the request.

Mahalo,



[EXTERNAL] Corrected testimony for CRB Interim Rule

From Rogerene Arce <Rogerene.Arce@co.maui.hi.us>

Date Tue 8/26/2025 10:44 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

August 26, 2025

Aloha Board of Agriculture and Biosecurity Members,

I am a resident of Molokai and providing testimony as the Director of the County of Maui Department of Agriculture. The County of Maui Department of Agriculture is in support of the Petition for Interim Rulemaking to Prohibit the Transportation of Material That May Introduce the Coconut Rhinoceros Beetle to the Island of Molokai. Since the confirmed findings of CRB in Kihei in 2023, the Maui County Department of Agriculture established the CRB Working Group of which it administers to prevent CRB coming to Molokai and Lana'i and to stop it's spread on Maui. The CRB Working Group is a collective of agencies with the Maui County Department of Agriculture and include representation from the Hawaii Department of Ag. and Biosecurity, the UH CRB Response Team, the Maui and Molokai Invasive Species Committees, and the County of Maui Department of Environmental Management's Environmental Protection & Sustainability Division.

The Maui County Department of Agriculture recognizes that Molokai does not have HDOAB inspectors. The CRB Working Group provides added efforts in the prevention and awareness of CRB through educational campaigns, CRB identification and awareness workshops and installation of monitoring traps including in the Kalawao County in Kalaupapa. The County of Maui Department of Environmental Management's Environmental Protection & Sustainability Division is supporting soil remediation for farmers to reduce need to bring in compost.

CRB would greatly impact Molokai's food security. Niu is cultivated by our Hawaiian Homestead farmers on Molokai for food security and diversifying our agriculture. Other CRB host plants include banana, sugarcane, ulu, and, pineapple which are grown by many residents as food sources that support our subsistence and sustainable lifestyle. Niu is culturally important and evident of the 160 year plus old Kapuaiwa Grove. CRB would also greatly change the ecosystem including the remote locations such as Kalaupapa and the inaccessible shores on the North side plateaus. Hala, a CRB host plant also grows in these remote locations.

The interim rule will provide an extra barrier to prevent CRB entering into Molokai. It is the only island in the state that is CRB free and it's vital it be kept that way. I respectfully ask the HDOAB and Board of Agriculture support the request.

Mahalo,

R. Kali Arce

Director, Department of Agriculture



(808) 270-8278

rogerene.arce@co.maui.hi.us

<https://www.maui-county.gov/2473/Department-of-Agriculture>

200 South High St., Wailuku, HI 96793

RICHARD T. BISSEN, JR.
Meia o Ke Kalana o Maui

J. KAPONO'AI MOLITAU
Po'o o Ka 'Oihana Kumuwaiwai 'Ōiwi

KEKAI ROBINSON
Hope Po'o o Ka 'Oihana Kumuwaiwai 'Ōiwi



KA 'OIHANA KUMUWAIWAI 'ŌIWI
DEPARTMENT OF 'ŌIWI RESOURCES
KE KALANA O MAUI, COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAI'I 96793
pūnaewe: www.mauicounty.gov leka uila: oiwi@co.maui.hi.us

26 'Aukake 2025

Chair Hurd and Members of the Board of Agriculture and Biosecurity
1428 South King Street
Honolulu, HI 96814-2512
Via e-mail: DAB.BOARD.TESTIMONY@HAWAII.GOV

RE: TESTIMONY IN SUPPORT OF INTERIM RULE TO PROHIBIT THE TRANSPORTATION OF MATERIAL THAT MAY INTRODUCE THE COCONUT RHINOCEROS BEETLE (CRB) TO THE ISLAND OF MOLOKAI

Aloha e ka Luna Ho'omalū Hurd a me nā lālā o ka Board of Agriculture and Biosecurity,

Thank you for the opportunity to testify in SUPPORT of this important measure. The request for review of the petition to initiate administrative rulemaking to implement an interim rule pursuant to Hawaii Revised Statutes §150A-9.5, to prohibit the transportation of plants, soil, gravel, and other Coconut Rhinoceros Beetle (CRB) host material including decomposing plant material such as compost, wood or tree chips, and mulch, plant propagation media and other items comprised of decomposing organic plant material such as landscaping material or erosion control socks, to the island of Moloka'i from any other area in the State to prevent the spread of CRB.

We SUPPORT this measure for the following reasons:

1. CRB is spread primarily via human vector, specifically through the movement, import, and export of various high risk host plant materials, mainly mulch, propagation media, and soil. Molokai is seeking proactive solutions to mitigate and prevent the introduction of this invasive pest species by prohibiting the transportation of CRB host materials from other areas of the State of Hawai'i. O'ahu's current level of infestation is devastating to their agriculture and CRB are now detected and infesting Kaua'i, Lāna'i, Maui, and Hawai'i Island. Authorities have been working on

eradicating and managing CRB spread for over a decade and Molokai is one of the last islands to detect CRB. We need to support this measure to limit exposure and infestation on Molokai.

2. The inconvenience and disruption of regular commercial activities through the implementation of meaningful biosecurity measures is a small price to pay to protect and perpetuate food secure systems, agricultural economic opportunities, and the overall cultural integrity of our island homes on Molokai.

3. CRB is a direct and active threat to our culturally significant mea kanu, plants, like our niu, loulu, maia, and kalo.

4. Furthermore, we support the extension of Plant Quarantine Interim Rule 24-2, as part of a multi layered approach to preventing the spread of CRB from the infested island of O'ahu, where CRB populations have been established. This additional rule should be extended until Hawai'i Department of Agriculture and Biosecurity finalizes a permanent rule, which should have been developed and considered nearly a year ago.

For the foregoing reasons, we SUPPORT this measure.

Sincerely,



Director John Kaponohai Molitau
Department of 'Ōiwi Resources, County of Maui

[EXTERNAL] Aug 26, 2025 - Agenda Item Plant Quarantine C-1

From Lu Ann Mahiki Lankford-Faborito <kaluhiokalanik@aol.com>

Date Tue 8/26/2025 10:37 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Our Ho'olehua Homesteader's Association fully support the testimony to protect Molokai from CRB in every way possible. Our member Kunani Nihipali has provided strong reasons why the transporting of potential plants can cause serious harm.

Please continue to protect Molokai with very strict rules and guidelines for transporting plants, soil, or other possible material.

Lu Ann Mahiki Lankford-Faborito

[EXTERNAL] Subject: Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From Peter Pale <ppale808@gmail.com>

Date Tue 8/26/2025 9:21 AM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Peter Pale and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

--

Mahalo

Peter Pale

808-286-6654

[EXTERNAL] Agenda IV.C.1 - Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i

From surabhi1234567@gmail.com <surabhi1234567@gmail.com>

Date Thu 8/28/2025 8:42 PM

To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Surabhi Agrawal and I am testifying in **STRONG SUPPORT** of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

The reasons given by staff to reject this temporary, one-year interim rule simply do not make sense. Just because the rules will only reduce, and not eliminate, the chances of CRB introductions to Moloka'i is not a reason to reject them. The Commerce Clause prohibits discrimination against interstate commerce, to prevent economic isolationism by the states - the interim rule does not discriminate against out-of-state products in favor of in-state products and is intended to prevent the devastating impacts of CRB on Moloka'i. Finally, the adoption of this rule would in no way force the Board to adopt any future rule proposal that "bans large swaths of commodities, regardless of their risk of spreading particular pests." Please do not let these illogical and disingenuous reasons be the basis for not providing Moloka'i with the enhanced temporary protection that it needs and deserves.

We know the impacts that the coconut rhinoceros beetle (CRB) may have on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulou, maia, kalo, and others.

We also know how easily this pest can spread through the movement of infested plants, mulch, and other products, including between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

Accordingly, I respectfully but strongly urge you to **SUPPORT** the interim rule proposal before you today. Mahalo nui for your consideration of this matter.

26 August 2025

Testimony in SUPPORT of Interim Rule for Moloka'i

Aloha Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Owana Ka'ōhelelani Salazar and I am testifying in STRONG SUPPORT of the Interim Rule to Prohibit the Transportation of Material that May Introduce the CRB to the Island of Moloka'i.

We are well aware of the impacts that the coconut rhinoceros beetle (CRB) has on not just our iconic and culturally vital niu, but on other plants and crops of great cultural, ecological, and economic importance, including loulu, maia, kalo, and others. We are also fully aware of how easily the CRB has already spread throughout our islands via the movement of infested plants, mulch, and other products, especially between islands - as illustrated by repeated new detections on Hawai'i Island, Maui, and most recently, Lāna'i.

The establishment of CRB on Moloka'i would be particularly devastating to the island's agriculture, cultural practices, and ecological integrity. As the last main Hawaiian island not yet impacted by CRB, and with little on-island resources to detect and eradicate new populations of this pest, it is imperative that we do what it takes to prevent its introduction to Moloka'i.

There are EXCEPTIONS to every rule! This one-year interim must be perceived as your and our GOLDEN OPPORTUNITY to preserve our food and natural resources. This is the very reason for the existence of the DLNR and BLNR. It is ultimately YOUR RESPONSIBILITY to do all that is necessary PROTECT and PRESERVE, and KEEP HAWAII SAFE FROM INVASIVE SPECIES.

Accordingly, I respectfully but strongly urge you to SUPPORT the interim rule proposal before you today.

Please heed this emergency situation and assert right action on this critical issue!

Mahalo nui,

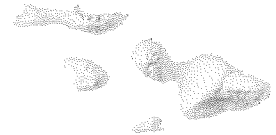
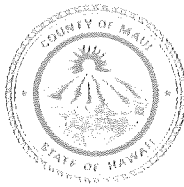
Owana Ka'ōhelelani Salazar

Owana Ka'ōhelelani Salazar
Owana.Salazar@mac.com

RICHARD T. BISSEN, JR.
Meia o Ke Kalana o Maui

J. KAPONO'AI MOLITAU
Po'o o Ka 'Oihana Kumuwaiwai 'Ōiwi

KEKAI ROBINSON
Hope Po'o o Ka 'Oihana Kumuwaiwai 'Ōiwi



KA 'OIHANA KUMUWAIWAI 'ŌIWI
DEPARTMENT OF 'ŌIWI RESOURCES
KE KALANA O MAUI, COUNTY OF MAUI
200 SOUTH HIGH STREET
WAILUKU, MAUI, HAWAI'I 96793
pūnaewe: www.mauicounty.gov leka uila: oiwi@co.maui.hi.us

26 'Aukake 2025

Chair Hurd and Members of the Board of Agriculture and Biosecurity
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Via e-mail: DAB.BOARD.TESTIMONY@HAWAII.GOV

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For the foregoing reasons, we SUPPORT this measure.

Sincerely,

A handwritten signature in black ink, appearing to read "John Kaponohai Molitau", with a long horizontal flourish extending to the right.

Director John Kaponohai Molitau
Department of 'Ōiwi Resources, County of Maui