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[EXTERNAL] Testimony on items C-2 and C-3 Biosecurity Action Alert: Protect Moloka'i and the Rest of Hawai'i from Invasive Pests

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From BARBARA DOFA <bdofa1@aol.com>

Date Sun 4/26/2026 9:48 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 Barbara Dofa and I am a resident of Maui county. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from**

**or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years.

**Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Barbara "Barbie"

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3**

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**From** Benton Kealii Pang <mokumanamana@gmail.com>  
**Date** Mon 4/27/2026 9:32 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 Benton Kealii Pang. I am a resident of Kaimukī, Honolulu, and a retired biologist with 26 years of federal service at the U.S. Fish and Wildlife Service's Pacific Islands Fish and Wildlife Office. During my career, I worked extensively on invasive species response across the Pacific, including coconut rhinoceros beetle. I also served on the Plant and Animal Committee of what was then the Department of Agriculture, and I know many of the dedicated staff who have worked tirelessly to protect Hawai'i from invasive threats.

I urge you to REJECT the staff recommendations in items C-2 and C-3.

On C-2: The Kalaupapa petition asks you to create an exception to protections the Moloka'i community fought hard to win. CRB has now been detected on Moloka'i for the first time. This is the worst possible moment to loosen importation rules or divert attention from active rapid response. The petitioner's outreach consisted of a self-designed survey circulated among a few dozen people, nearly all from Kalaupapa. That is not community consultation. Reject this petition and send it back for genuine, broad engagement with Moloka'i residents.

On C-3: Locking in pest designations based on a 2008 species list is a serious mistake. The queensland longhorn beetle, two-lined spittlebug, and hala scale were not on anyone's radar 18 years ago. They are serious threats today. I respect the staff doing this work. I have worked alongside many of them. But this proposal reflects the pattern I have seen repeatedly over my career: well-meaning staff constrained by leaders who cycle through without developing the deep commitment to Hawai'i's environment that the work demands. The people on the ground know better. Give them the time and direction to get this right.

Please send DAB staff back to consult with scientists and community members who are actively fighting these battles today.

Mahalo nui,

Benton Kealii. Pang, Ph.D.

Retired Supervisory Biologist, U.S. Fish and Wildlife Service

Kaimukī, Honolulu

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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**From** Bobbie Foster <hawaiiobbie@gmail.com>

**Date** Mon 4/27/2026 7:11 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 Bobbie and I am a resident of Oahu. I urge you to REJECT the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to **C-2**, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule. Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. Much more community conversation and dialogue is needed before you even consider this controversial ask.

With multiple recent detections of CRB on Moloka'i for the first time ever, now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.

Second, with regards to **C-3**, as someone who volunteers for the Hawaii Ant Lab and native plant restoration projects, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.

Mahalo nui for your consideration of this matter.

Sincerely,  
Roberta (Bobbie) Foster



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[EXTERNAL] MONDAY, April 27, 2026, Testimony on Agenda Items C-2 and C-3 scheduled for 4/28/26

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From Bobby Camara <kuabay@hawaiiintel.net>  
Date Mon 4/27/2026 11:10 AM  
To DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>  
Cc Wayne Tanaka <wayne.tanaka@sierraclub.org>

Welina mai Chair Hurd and Members of the Board of Agriculture and Biosecurity,

My name is Bobby Camara. I reside in Kea'au ma kai on Hawai'i, am a kama'āina of Honoka'a, Hāmākua, and retired after 30 years at Hawai'i Volcanoes National Park.

I write urging you to DENY Staff Recommendations for the above agenda items, described below.

- 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year.
- 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, it is deeply perplexing that there are not Rules for the entire State. Why does EACH island or District need to go through laborious and time-consuming processes, repeatedly, to protect our wildlife and 'āina? WHY?

I note that as far as I can tell, the Noxious Weeds List was last updated 6/18/92, and the Injurious Wildlife List on 11/1/14. If your Department is abiding by our Constitutional Mandates, WHY aren't these lists updated annually?

There appears to be absolutely no sense of urgency when dealing with new introductions, and then, when populations become established, nothing to try to eliminate them. You folks should be ashamed and embarrassed at the dismal state of our environment. But, apparently you are not. Why is beyond my ken. Employees are complacent, lazy, shackled to desks, uninformed, and worst of all, ignorant of critical damage wrought by noxious, invasive species. If any of you care, I can't see it, though of course there are those in Government who do indeed care. But invariably they are unsupported by bureaucrats and cubicle dwellers. Field work is thankless.

I do see: Miconia spreading on windward Hawai'i, albizia spreading everywhere as we wait in dread for the next windstorm or hurricane to fell trees and cut electrical power off for many days. Not a great scenario when one is bedbound to a hospital bed, dependent on electricity to move and readjust. I see sheep and goat populations exploding on Maunakea and along Saddle Road. WHY? Hundreds of animals crossing at a time, being hit by and damaging vehicles. WHY? Sheep and goats eat everything in sight here, and on Maui, Lāna'i, Moloka'i, Axis deer do the same. What little topsoil is left on denuded slopes washes ma kai during heavy rains, ending up in Kīhei and in the sea, where

mud coats corals stressed by extreme ocean temperatures. WHY? Chameleons and lizards proliferate, alien birds multiply, mosquitoes thrive, and precious endemic birds suffer. WHY? Gorse spreads unfettered on Maunakea slopes on lands supposedly managed by DHHL. WHY? Yellow-flowered fireweed spreads, spittlebugs kill kikuyu pasturage, Morella faya continues to invade, and now we see the scourge of fountaingrass, once mostly found blanketing over a hundred fifty thousand acres in North Kona and South Kohala, during the past 20 years has spread to drape pali faces from Pololū to Waipī'o. WHY? Countless species of alien grasses choke native habitats, all adding to extreme fire hazards. WHY? Everyone laments the loss of Lahaina and the over 100 killed there by wildfire. WHY? I'm waiting for Waikōloa Village to burn. Waikōloa. Thousands of residents. WHY? Zero sense of urgency, lots of finger-pointing, and only ONE road in or out. WHY? Even in National Parks, weeds and alien creatures spread. Fire ants, coqui frogs, 'ekoa going wild. WHY???

So. People that we all contribute to paying via our hard-earned taxes. YOU work for US!!! Have you all forgotten that you are Public Servants? That you are to serve the Public Good? That your primary kuleana is to protect and perpetuate our natural and cultural resources for the benefit of of keiki and their keiki? Have you forgotten?

Please no more excuses. Abide by your sworn duties. Educate your Staff. DENY these agenda items.

mahalo,

Bobby Camara  
Kea'au Hawai'i



Board of Agriculture and Biosecurity  
April 28, 2026  
9 a.m. Plant Quarantine Branch  
1849 Auiki Street  
Honolulu, Hawaii 96819

**Testimony on Agenda Item IV.C.3. To Initiate Rulemaking  
on New Chapter 4-69, Hawaii Administrative Rules**

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

The Coordinating Group on Alien Pest Species (CGAPS) believes the adoption of chapter 4-69, Hawaii Administrative Rules (HAR), as proposed in the submittal, would have a dramatic and negative impact on Hawaii's biosecurity. As noted in the submittal, at the informational briefing on April 15, 2026, the Department of Agriculture and Biosecurity (DAB) responded to questions about DAB's policies for admitting into Hawaii material that is found to be infested or infected with an insect, disease, or pest. During the briefing, testimony indicated that the Plant Quarantine Branch (PQB) inspectors may be violating provisions of chapter 150A, Hawaii Revised Statutes (HRS), by admitting infested or infected materials, particularly because DAB has not developed a list of species that are "pests" for purposes of chapter 150A HRS and does not have a list of insects, diseases, or pests that are widespread in Hawaii for DAB inspectors to reference. At the end of the briefing, DAB agreed to bring to this Board, for consideration at this meeting, a list of species that could be designated as "pests" for purposes of chapter 150A HRS. This was requested to include species listed in the Hawaii Invasive Species Council (HISC) administrative rules (HAR 13-326-1(b)), species on DAB's existing lists, and is intended to be a "starting point" for the development of a list of "pest" species to be excluded from the State under chapter 150A HRS. We understand the goal of this process is to increase biosecurity in Hawaii and to inform shippers and consumers about which insects, diseases, or pests may be present on items imported into and subsequently purchased in Hawaii.

In response, DAB prepared this submittal to initiate rulemaking on a new chapter 69 HAR. The proposed new chapter designates, by cross reference, the "List of Insects, Mites, Other Pests, and Plant Diseases Designated as Pests for Control or Eradication Purposes by the Hawaii Department of Agriculture," adopted on December 16, 2008, set out in attachment 1 to chapter 4-69A HAR (the chapter 69A list), as the list of pests "allowing regulatory action by the Department." (DAB's proposed § 4-69-1)

We appreciate that DAB had very limited time to prepare the list and submittal for this Board meeting. However, limiting DAB's authority to take regulatory action only to species on the

chapter 69A list will significantly impact Hawaii’s biosecurity. For instance, the chapter 69A list does not include:

- *Aedes aegypti*, *Aedes scutellaris*, and *Anopheles spp.*, mosquitoes of serious human and animal health concern that are included in the HISC administrative rules. (HAR 13-326-1(b))
- Asian giant hornet, *Vespa mandarinia*, an invasive species harmful to human health, beneficial honey bees, and other species.
- A variety of potential destructive terrestrial snail species, *Cerutuella spp.*
- Queensland longhorn beetle, *Acalolepta aesthetica*, an invasive longhorn beetle that attacks many agriculturally and culturally important plant species, currently limited to Hawaii Island.
- Two-lined spittlebug, *Prosapia bincta*, a serious pest of range and other grasses, which is currently limited to Hawaii Island.
- Hala scale, *Thysanococcus pandani*, a serious pest of hala, an environmentally and culturally significant indigenous plant.
- Macadamia felted coccid, *Acanthococcus ironsidei*, a detrimental pest to the macadamia nut industry in Hawaii.

These are just a handful of examples of destructive pests that are either not present in Hawaii or that are not widely distributed, and a full list of pests for prevention could be pages long. An additional concern about the adoption of the chapter 69A list is that it has not been updated in nearly 18 years. Further, the chapter 69A list is intended to be limited to pests identified for control or eradication, not for prevention or inspection purposes. The scope of chapter 4-69A HAR, “Pests for Control and Eradication,” is as follows: “§ 4-69A-1 Scope of rules. These rules shall govern the criteria and procedures for designation of pests for control or eradication programs on public or private property other than dwellings in the State.” (emphasis added) The chapter 69A list is intended to be a smaller list of pests that DAB’s Plant Pest Control Branch will spend significant resources controlling. It is not related to the species that PQB will prohibit from entering Hawaii, a much larger universe of species. The chapter 69A list does not include all species found on DAB’s existing list of “Examples of Regulated Pests” in section 4-72-15 HAR, which was updated in 2025, and omits many species DAB prohibits or restricts from entering Hawaii under chapters 4-68 (noxious weeds), 4-70 (plant pest import rules), 4-71 (non-domestic animal import rules), or 4-71A (microorganism import rules). Finally, the chapter 69A list omits species that are subject to a federal United States Department of Agriculture (USDA) quarantine, such as citrus huanglongbing, the disease responsible for citrus greening, and the destructive Asian longhorned beetle. [Act 190 \(2025\)](#)<sup>1</sup> prohibits any articles moved in violation of a federal pest quarantine from entering Hawaii. (HRS 150A-11.2)

CGAPS urges the Board to ask PQB to: (1) revise the list of “pests” under chapter 150A HRS to include more species that are known or reasonably believed to be harmful invasive species that

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<sup>1</sup> [https://www.capitol.hawaii.gov/slh/Years/SLH2025/SLH2025\\_Act190.pdf](https://www.capitol.hawaii.gov/slh/Years/SLH2025/SLH2025_Act190.pdf)

are not present, are of limited distribution, or are subject to ongoing control in Hawaii;<sup>2</sup> and (2) seek the advice of the Office of the Attorney General on statutory language, regulations, or other authorities necessary to authorize DAB inspectors to take action under chapter 150A HRS on pests “not-known-to-occur” (NKO) in Hawaii.

PQB’s submittal cites to section 141-3 HRS of chapter 141 HRS for the proposition that all “pests” must be designated by rule. Section 141-3 HRS requires DAB to designate, by rule, a list of pests that will be subject to control or eradication by DAB. Section 141-3.5(a) HRS requires DAB to “develop and implement a detailed control or eradication program for any pest designated in section 141-3, using the best available technology in a manner consistent with state and federal law.” (HRS 141-3.5(a)) The chapter 69A list is the list required by section 141-3 HRS. As noted above, it is intended to be limited to pests that the Plant Pest Control Branch will devote significant resources to controlling or eradicating within Hawaii.

Chapter 150A HRS is the chapter that broadly addresses PQB’s prevention and inspection authorities. This chapter includes sections 150A-5 and 150A-7, which relate to the exclusion of “pests” from the State. Section 150A-2 includes a definition of “pest” that applies in chapter 150A HRS (and not to chapter 141 HRS), and that does not require all pest species to be designated by rule, but instead, “determined by the Board.” The full definition of “pest” in section 150A-2 HRS is as follows:

“‘Pest’ means any animal, insect, disease agent or other organism in any stage of development that is detrimental or potentially harmful to agriculture, or horticulture, or animal or public health, or natural resources including native biota or has an adverse effect on the environment as determined by the board.” (HRS 150A-2) (emphasis added)

We hope the Board will encourage DAB to work with the Office of the Attorney General to determine whether DAB can develop a process for the Board to determine which species are “pests” for purposes of chapter 150A HRS. Allowing the Board to update the list without full chapter 91 rulemaking will enable DAB to keep the list up to date and to include pests that have recently been found to be invasive or are expanding their range due to climate change or other factors. Whether or not the final list of “pests” prohibited from entering Hawaii must be included in an administrative rule, the process of creating that list will take time. Working closely with the Office of the Attorney General may also help PQB avoid any unintended

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<sup>2</sup> In preparing a comprehensive pest list, we hope DAB will also consider the [Hawaii Prevention Priority Species List](https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Prevention-Priority-Species-List-APRIL-2024.pdf) (<https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Prevention-Priority-Species-List-APRIL-2024.pdf>) and the [Hawaii Limited Distribution List](https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Limited-Distribution-List-SEPT2024.pdf) (<https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Limited-Distribution-List-SEPT2024.pdf>). The Hawaii Prevention Priority Species List was last updated in 2022, and the Hawaii Limited Distribution List was last updated in 2024; both are multi-agency efforts under the Prevention and EDRR Working Group, which DAB co-chaired. These Lists document species that are likely to arrive, are not known to occur (NKO) or have limited distribution in Hawaii, have a pathway of arriving, and are, or are likely to be, pests if introduced.

weakening of other restrictions and prohibitions, such as those on noxious weeds, and those animals and organisms that are restricted or otherwise not allowed to be imported.

The informational briefing and DAB's submittal highlight how complex and, at times, confusing DAB's statutes governing the designation, prevention, and control of pests are. Perhaps this discussion will lead to a broader discussion of how DAB's statutes could be amended to clarify these issues to assist inspectors, importers, and the broader community in preventing and controlling invasive pests in Hawaii.

We appreciate DAB's effort to produce a list of "pests" in such a short time frame. However, the adoption of the chapter 69A list as Hawaii's sole and comprehensive list of pests prohibited under chapter 150A HRS will not allow DAB to prevent the introduction of known harmful pest species that are not present, have limited distribution, or are actively being controlled in the State.

Thank you for the opportunity to provide this testimony and for all your efforts to prevent the introduction and spread of pests in Hawaii.

Aloha,



Christy Martin  
CGAPS Program Manager



Stephanie Easley  
CGAPS Legal Fellow

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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**From** Christy shaver <christyshaver@gmail.com>

**Date** Sun 4/26/2026 9:51 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 Christy and I am a resident of Lahaina. I respectfully urge you to REJECT the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.

Mahalo nui for your consideration of this matter.

Sincerely,

Christy Shaver

**[EXTERNAL] NO on Agenda Items C-2 and C-3.**

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**From** Cory <333cory@gmail.com>

**Date** Sun 4/26/2026 8:46 PM

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

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

Please vote NO on C-2 and C-3 recommendations.

C-2 proposes an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted just last year--despite the alarming news that CRB beetles were just found for the first time on Moloka'i, and in multiple locations. It is imperative that we support rapid response efforts, not exceptions!

C-3 proposes basing decisions on a list of proposed designated "pests" from 2018--ignoring almost two decades of the onslaught of more and more invasives, and ignoring the expertise of professionals and community members who have been on the front line for years combating invasives.

Mahalo for your consideration.

Cory Harden

Hilo

(now home of the coqui frog, fire ant, albezia, etc, etc)

**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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

**Date** Mon 4/27/2026 8:32 AM

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

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

I respectfully urge you to deny the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

Now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible. Moreover, you should not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago.

Your DAB staff should be consulting with experts and community members who have been at the forefront of the fight against invasive species.

Mahalo,  
Sherry Pollack

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[EXTERNAL] Testimony for April 28, 2026, Agenda Items C-2 and C-3

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From Boisvert-Jorgensen <infofordenise@yahoo.com>

Date Mon 4/27/2026 7:40 AM

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

## **It is time for Hawai'i to stop rolling out the red carpet to invasive species!**

**Are you going to let Moloka'i be devastated the way all the other islands have been, thanks to years of legislative and state department board and committee delays, deferments, special exceptions, and complete inaction?**

**Why were they not 'nipped in the bud' when they should have been years ago - despite all the warnings government agencies have been given?**

**The Coconut Rhinoceros Beetle has been spreading island-to-island from sources IN and OUTSIDE of the state. On March 30, just a few weeks ago, Hawai'i News Now reported that a Waialua woman found over 60 CRB grubs in a new bag of soil purchased at the Lowe's in Waipahu!**

<https://www.hawaiinewsnow.com/2026/03/31/horrifying-oahu-woman-finds-crb-newly-purchased-bag-soil/>

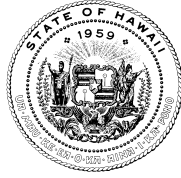
**Take away the red carpet! No exceptions to the ban to protect Moloka'i!**

**And, please, get with the times by updating the designated 'pest' list.**

Mahalo,  
Denise Boisvert  
O'ahu

JOSH GREEN, M.D.  
GOVERNOR  
STATE OF HAWAII  
*Ke Kia'āina o ka Moku'āina 'o  
Hawaii'*

SYLVIA J. LUKE  
LT. GOVERNOR  
STATE OF HAWAII  
*Ka Hope Kia'āina o ka Moku'āina  
'o Hawaii'*



KALI WATSON  
CHAIRPERSON, HHC  
*Ka Luna Ho'okele*

KATIE L. LAMBERT  
DEPUTY TO THE CHAIR  
*Ka Hope Luna Ho'okele*

**STATE OF HAWAII**  
**DEPARTMENT OF HAWAIIAN HOME LANDS**  
*Ka 'Oihana 'Āina Ho'opulapula Hawaii'i*

P. O. BOX 1879  
HONOLULU, HAWAII 96805

**TESTIMONY OF KALI WATSON, CHAIR**  
**HAWAIIAN HOMES COMMISSION**  
**BEFORE THE BOARD OF AGRICULTURE AND**  
**BIOSECURITY MEETING**  
**ON APRIL 28, 2026 AT 9:00AM**

Section C. Plant Industry, Item 2 - Resubmittal of Request for: Review and Approval of the Petition From Nancy Holman, Kalaupapa National Historic Park, to Initiate Administrative Rulemaking to Amend Plant Quarantine Interim Rule 25-1, to Allow Gravel to be Moved From Any Other Area in the State to the Island of Molokai if it Has Been Subjected to an Approved Treatment Prior to Movement

The Department of Hawaiian Home Lands (DHHL) is in **support** of the request on the Agenda for April 28, 2026 Section C. Plant Industry, Item 2. Resubmittal of Request for: Review and Approval of the Petition From Nancy Holman, Kalaupapa National Historic Park, to Initiate Administrative Rulemaking to Amend Plant Quarantine Interim Rule 25-1, to Allow Gravel to be Moved From Any Other Area in the State to the Island of Molokai if it Has Been Subjected to an Approved Treatment Prior to Movement.

DHHL is in support of using Profume gas fumigant SLN Hi-2501 to fumigate gravel going to Molokai, at the rate it is approved for at 3000CT it will kill all life stages of CRB as well as any other hitching pests and invasive species that may be present in the shipment, such as Little Fire ant and Coqui frog.

As a United States Department of Agriculture and Hawaii Department of Agriculture and Environmental Protection Agency approved treatment that has been tested for the last 8 years it is the only product that has successfully fumigated mulch piles and host material allowing the movement of sterile products out of quarantine zones. Fumigation prior to shipping in conjunction with safeguarding during transit will keep the gravel from being reinfested. Please allow the gravel to be treated so we can help maintain roads and infrastructure to keep infrastructure maintained and patients safe.

Mahalo for your consideration of this testimony.

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**[EXTERNAL] Testimony about C-2 and C-3**

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From Earl Kim <mothra246@yahoo.com>

Date Sun 4/26/2026 12:19 PM

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

My name is Earl J. Kim and I am a resident of Honolulu. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Earl J. Kim

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Earl Kim <mothra246@yahoo.com>

Date Sun 4/26/2026 12:14 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 Earl J. Kim and I am a resident of Honolulu. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive**

**species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Earl J. Kim  
Honolulu, HI

**(No subject)**

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**From** ejmvmmd (null) <ejmvmmd@aol.com>

**Date** Sun 4/26/2026 6:02 PM

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

Second, with regards to C-3, I have concerns about moving forward with a list of designated pests compiled over 18 years ago. This list needs to be updated to include more recent invasive species ( such as the Queensland longhorn beetle, the two lined spittle bug, and hala scale). We need to safe guard our island home's biodiversity.

Mahalo nui for your consideration of this matter.

Sincerely,

Dr Eric Muller

Sent from my iPad

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**[EXTERNAL] Testimony re Bison for the North Shore of O'ahu**

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**From** Foljambe <Foljambe@proton.me>

**Date** Mon 4/27/2026 8:49 AM

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

C. PLANT INDUSTRY DIVISION Plant Quarantine Branch 1. Request to: (1) Allow the Importation and Possession of Twenty-seven (27) Plains Bison, *Bison bison*, an Animal on the List of Restricted Animals (Part B), by Permit, for Breeding and Commercial Meat Production, by Aloha Bison, LLC; and (2) Update Permit Conditions for the Importation and Possession of Plains Bison, *Bison bison*, an Animal on the List of Restricted Animals (Part B), by Permit, for Breeding and Commercial Meat Production, by Aloha Bison, LLC.

Madame Chair and Members of the BAB:

I am Cathy Goeggel, President of Animal Rights Hawai'i

We strongly oppose this request. Bison are plains animals. They are heavy, which should have been considered by the Kaua'i importer, when placing them in Hanalei. I remember that storm that caused the Hanalei River to breach its banks- several bison were carried out to sea and drowned. I understand that the surviving bison were moved farther inland, but this begs the question regarding Waialua, which recently experienced massive flooding - Are you seriously planning to approve bison for the fragile coastal north shore of O'ahu ?

With regard to field slaughter, I understand that a USDA veterinarian needs to oversee the kill. The alternative would be to truck the bison to the abattoir at Campbell Industrial Park. which is designed for cattle. A re-fit would be necessary for slaughter under the Humane Methods of Livestock Slaughter Act (P.L. 85-765; 7 U.S.C. 1901 et seq.) Would the taxpayers foot the bill?

We ask that you consider this request with the knowledge that the Wahiawa dam could still breach, and that bison bodies are, at best, a niche food, and would not be affordable to most Hawai'i consumers.

Please deny this request. Mahalo.

Cathy Goeggel  
President, Animal Rights Hawai'i  
Animal Advocates since 1977

 Outlook

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**[EXTERNAL] Testimony on agenda items C-2 and C-3**

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**From** Glenn Choy <choyhawaii@gmail.com>

**Date** Sun 4/26/2026 11:34 AM

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

I urge you to reject staff recommendations on these items for reasons stated by the SIERRA CLUB

Sent from my iPad

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3**

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**From** Hooululahui Akaka <hooululahui@gmail.com>

**Date** Sun 4/26/2026 8:30 PM

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

Aloha Chair Hurd and Members of the Board,

My name is Ho'oululāhui Erika Akaka. I am a resident of Hawai'i Island, specifically the moku of Puna and the ahupua'a of Waikahekahe. As a professional currently working in agricultural extension and community engagement, I am writing to respectfully urge the Board to **DENY** the staff recommendations for items C-2 and C-3.

**Regarding Item C-2: Petition for Exception to Moloka'i CRB Rules** I stand in firm solidarity with the Moloka'i residents who successfully advocated for the historic Coconut Rhinoceros Beetle (CRB) emergency rules. I urge you to reject the petition for an exception for the following reasons:

- **Lack of Meaningful Consultation:** The petitioner has failed to engage the broader Moloka'i community. A localized survey of a few dozen individuals is not a substitute for true community dialogue. For a rule with island-wide implications for biosecurity, a much more robust "co-envisioning" process is required.
- **Improper Timing:** With recent first-time CRB detections on Moloka'i, now is the time to strengthen—not relax—protections. We must not distract from or disrupt the rapid response efforts currently being led by the Moloka'i community to eradicate this threat.

**Regarding Item C-3: Rulemaking Proposal to Designate "Pests"** I have grave concerns regarding the reliance on a list of invasive species identified over 18 years ago (2008).

- **Outdated Data:** Moving forward with a nearly two-decade-old list ignores critical threats that have emerged since, such as the Queensland longhorn beetle, the two-lined spittlebug, and the hala scale.
- **Need for Expert/Community Input:** I urge the Board to direct DAB staff to "go back to the drawing board." We must consult with the experts and community members who have been at the forefront of invasive species management over the last five years to ensure our regulatory actions reflect current ecological realities.

Biosecurity is the foundation of our islands' food security and environmental health. We must ensure that our policies are informed by both the best available modern science and the voices of the communities most impacted by these decisions.

Mahalo nui for your time and for your dedication to protecting our pae 'āina.

Me ka ha'aha'a,

Ho'oululāhui Erika Akaka Resident of Waikahekahe, Puna

(808) 990-7510, [hooululahui@gmail.com](mailto:hooululahui@gmail.com)

[EXTERNAL] DAB

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From Jerry Welch <jerry@haikupalms.com>

Date Sun 4/26/2026 1:02 PM

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



Aloha e Jerry,

Next Tuesday, the Board of Agriculture and Biosecurity (“BAB”) will be considering two items that have raised significant concerns from the Moloka‘i community and biosecurity stakeholders throughout the islands.

First, BAB will consider a petition from the superintendent of the Kalaupapa settlement on Moloka‘i, asking for an exception to the [ban on the importation of coconut rhinoceros beetle \(CRB\) host material](#) passed late last year. Notably, while the request comes from Kalaupapa superintendent, it would allow for the importation of “treated” gravel anywhere on Moloka‘i. Topside residents who organized and advocated successfully for the importation ban were not consulted by the petitioner, and the recent discovery of CRB for the first time on Moloka‘i over the last several weeks makes clear that this is NOT the time to loosen CRB protections, or distract from [current rapid response efforts](#) to detect and eradicate any potential infestations.

Second, legislators have been raising concerns - [validated by the Attorney General](#) - that Department of Agriculture and Biosecurity (“DAB”) inspectors are [not complying with the law](#), by allowing goods “lightly infested” with unspecified invasive species to enter the state without treatment or eradication, when those species are already known to occur in some parts of the islands. In response, BAB will consider a rule proposal to designate what invasive species will be considered a “pest” subject to regulatory action, including during importation into the islands and interisland transportation. The

problem? **The list of designated “pests” is based on a list from 2008 - omitting species, like the two-lined spittlebug, hala scale, and Queensland longhorn beetle - that have since been recognized as posing major threats to our islands’ biosecurity.** Clearly, this rule proposal must be much more thoroughly developed before it advances to a formal public hearing, and its outdated list of designated pest species are “locked in” for the foreseeable future.

Please take a moment to testify - sample testimony and testimony instructions below!

### **Sample Testimony**

**To:** [DAB.BOARD.TESTIMONY@HAWAII.GOV](mailto:DAB.BOARD.TESTIMONY@HAWAII.GOV)

**Subject:** Testimony on Agenda Items C-2 and C-3.

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

My name is Emmett Welch \_\_\_\_\_ and I am a resident of Maui \_\_\_\_\_. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka’i coconut rhinoceros beetle (“CRB”) rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as “pests” subject to “regulatory action” by the Department of Agriculture and Biosecurity (“DAB”).

First, with regards to C-2, I stand with Moloka’i residents who successfully advocated for last year’s historic CRB emergency rule for Moloka’i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for “treated” gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka’i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year’s importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka’i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract**

**from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the Queensland longhorn beetle, the two-lined spittlebug, or the Hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Emmett Welch



[Donate](#)

[Become a member](#)

[Sierra Club of Hawai'i](#)

Aloha,

Jerry Welch

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**[EXTERNAL] LIVE NOTE: Testimony on Agenda Items C-2 and C-3.**

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From John Shockley <shockleyjr@gmail.com>

Date Sun 4/26/2026 11:09 AM

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

Cc Rita Shockley <eartoeargrin@gmail.com>; Wayne (O'ahu Sierra Club) Tanaka <hawaii.chapter@sierraclub.org>

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

Rita and I are Coordinators for the Free Accesscoalition located in Makakilo, West O'ahu. We respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, We stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, we have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and**

**community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,

John & Rita Shockley Coordinators Free Access Coalition [www.freeaccesscoalition.weebly.com](http://www.freeaccesscoalition.weebly.com)

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Joseph Wat <joew@keyproject.org>

Date Mon 4/27/2026 10:32 AM

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

My name is Joe Wat and I am a resident of Kahalu'u, O'ahu. I respectfully urge you to **DENY** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial proposal.**

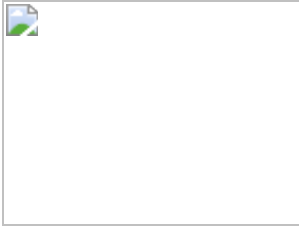
Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of proposed designated "pests" based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

- Joe Wat


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**Joe Wat**

Community Development Coordinator  
KEY Project

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 808 239 5777

 [keyproject.org](http://keyproject.org)

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**[EXTERNAL] Testimony on Agenda Item C-3: update the pest list**

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**From** Josephine Smith <smithjos@hawaii.edu>

**Date** Sun 4/26/2026 1:35 PM

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

We need an updated pest list!

With regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.

We need to do better to protect our islands ecosystems, forests and farms.

Jody Smith

96825

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Karin Olson <olson.karin@hotmail.com>

Date Sun 4/26/2026 10:40 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 Karin Olson and I am a resident of Maui. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Karin Olson

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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**From** Karlo Tanjuakio <karlo@ventusnetwork.com>  
**Date** Mon 4/27/2026 8:35 AM  
**To** DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>  
**Cc** Wayne Tanaka <wayne.tanaka@sierraclub.org>

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

My name is Karlo Tanjuakio and I am a resident of Makaha Valley on Oahu. I respectfully urge you to **DENY** the staff recommendations in items C-2 and C-3, concerning:

1. the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and
2. a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among **only a few dozen individuals**, nearly all from Kalaupapa. Minimally, much more community conversation and dialogue is needed before you even consider this controversial proposal.

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.

Second, with regards to C-3, I have grave concerns about moving forward with a list of proposed designated "pests" based only on certain species of concern identified over **18 years ago**. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala

scale) over the last 5 years. Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.

Mahalo nui for your consideration of this matter.

Karlo Tanjuakio

[EXTERNAL] Testimony on Agenda Items C-2 and C-3.

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

Date Mon 4/27/2026 7:52 AM

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

**A wise frog (not a coqui) named Kermit once sang, “It’s not easy being green”. He may have been talking about his looks, but his statement was far-reaching - even all the way to the middle of the Pacific Ocean.**

**It is not enough to simply recycle, and to not waste water, and to stop polluting the air and water around us.**

**It takes courage and conviction to battle extremely fierce opponents such as the formidable coconut rhinoceros beetle, and little fire ants, and coqui frogs, and the far too many other invasive species and noxious weeds that have been thriving in Hawai'i for decades upon decades.**

**Please have the courage and conviction to keep the ban in place with no exceptions - - for Moloka'i's sake.**

***And, please ACCURATELY update the 18-year old invasive pest list to include those that will become serious dangers, like the queensland longhorn beetle, the two-lined spittlebug, and the hala scale. The danger from the CRB was not taken seriously enough when the government was first warned about it, and look where we are now.***

Kim Jorgensen  
Honolulu

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Nanea Lo <naneaclo@gmail.com>

Date Mon 4/27/2026 9:33 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 Nanea Lo and I am a resident of O'ahu, Mō'ili'ili. I respectfully urge you to **DENY** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial proposal.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of proposed designated "pests" based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go**

**back to the drawing board” to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

--

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

Board Member | [Hawai'i Workers Center](#)

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

Digital Archivist | [Kona Historical Society](#)

(808)444-1229

[LinkedIn](#)

**"A'ole 'ulu i loa'a i ka pōkole o ka lou"** - 'Ōlelo No'eau

No breadfruit can be reached when the picking stick is too short.

**There can be no success without preparation.**

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Pete Wilson <perhansahi@gmail.com>

Date Sun 4/26/2026 9:41 AM

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

My name is Peter Wilson and I am a resident of Pahoā. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Peter Wilson

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

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3.**

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From Rosie Alegado <rosie.alegado@gmail.com>

Date Mon 4/27/2026 8:02 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 Rosanna 'Anolani Alegado, and I am a resident of Kahalu'u, O'ahu. I respectfully urge you to **DENY** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regard to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. Despite the wide-ranging implications and the increased risk of CRB introductions, the petitioner has not yet meaningfully engaged with the broader Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **At a minimum, much more community conversation and dialogue are needed before you even consider this controversial proposal.**

Beyond the need to consult with the broader community, including, in particular, the advocates of last year's importation ban, this petition should also be rejected as untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, regarding C-3, I have grave concerns about moving forward with a list of proposed designated "pests" based solely on species identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Rosanna Alegado

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**[EXTERNAL] testimony on Agenda Items C-2 and C-3.**

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From Shay Chan Hodges <shay.chanhodges@gmail.com>

Date Mon 4/27/2026 9:15 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 Shay Chan Hodges and I am a resident of Haiku, Maui. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

First, with regards to C-2, I stand with Moloka'i residents who successfully advocated for last year's historic CRB emergency rule for Moloka'i, in urging you to reject the petition for an exception to this rule.

Notably, while submitted by the Kalaupapa superintendent, the petition would allow for "treated" gravel to be imported to any part of the island. However, despite the wide-ranging implications and increased risk of CRB introductions, the petitioner still has not met meaningfully with the larger Moloka'i community. Instead, it has substituted community consultation with a survey it appears to have developed on its own, and circulated among only a few dozen individuals, nearly all from Kalaupapa. **Minimally, much more community conversation and dialogue is needed before you even consider this controversial ask.**

Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

Second, with regards to C-3, I have grave concerns about moving forward with a list of designated pests, based only on certain species of concern identified over 18 years ago. The 2008 list of invasive species proposed for "pest" designation and regulatory action - such as importation bans and intrastate movement prohibitions - ignores a number of invasive species that have arisen as serious threats since that time, as well as the extensive work that has been done to identify additional species of concern (such as the queensland longhorn beetle, the two-lined spittlebug, or the hala scale) over the last 5 years. **Please do not "lock in" official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to "go back to the drawing board" to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,

Shay Chan Hodges

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Read/Write Community

Responsible Markets

Maui ESG Project

[maiesgproject.org](http://maiesgproject.org)

808.250.6160

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**[EXTERNAL] Bio security**

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**From** Stephen Holmes <councilmemberholmes@icloud.com>  
**Date** Mon 4/27/2026 3:52 AM  
**To** DAB.BOARD.TESTIMONY <dab.board.testimony@hawaii.gov>

**To:** [DAB.BOARD.TESTIMONY@HAWAII.GOV](mailto:DAB.BOARD.TESTIMONY@HAWAII.GOV)  
**Subject:** Testimony on Agenda Items C-2 and C-3.

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

My name is [steve Holmes] and I am a resident of [Hawaii Island]. I respectfully urge you to **DENY** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

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**were deemed a threat nearly two decades ago, and urge DAB staff to “go back to the drawing board” to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Steve Holmes

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**[EXTERNAL] Testimony on Agenda Items C-2 and C-3**

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From p tearson <tia.pearson@gmail.com>

Date Sun 4/26/2026 7:43 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 Tia Pearson and I am a resident of Oahu. I respectfully urge you to **REJECT** the staff recommendations in items C-2 and C-3, concerning 1) the petition for an exception to the Moloka'i coconut rhinoceros beetle ("CRB") rules you adopted last year, and 2) a rulemaking proposal to designate certain invasive species as "pests" subject to "regulatory action" by the Department of Agriculture and Biosecurity ("DAB").

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Beyond the need to actually consult with the larger community, including and particularly the advocates for last year's importation ban, this petition should also be rejected as particularly untimely. With multiple recent detections of CRB on Moloka'i for the first time ever, **now is not the time to relax protections against the further introduction of CRB to the island, nor is it the time to distract from or disrupt the active rapid response efforts being undertaken by the Moloka'i community to detect and eradicate any potential CRB infestations as soon as possible.**

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hala scale) over the last 5 years. **Please do not “lock in” official pest designations to only those invasive species that were deemed a threat nearly two decades ago, and urge DAB staff to “go back to the drawing board” to consult with experts and community members who have been at the forefront of our current fight against invasive species.**

Mahalo nui for your consideration of this matter.

Sincerely,  
Tia Pearson

## TESTIMONY IN OPPOSITION

### **Resubmittal of Request for Review and Approval of the Petition from Nancy Holman, Kalaupapa National Historic Park, to Initiate Administrative Rulemaking to Amend Plant Quarantine Interim Rule 25-1, to Allow Gravel to be Moved from Any Other Area in the State to the Island of Molokai if it Has Been Subjected to an Approved Treatment Prior to Movement.**

Department of Agriculture and Biosecurity  
Plant Quarantine Branch  
1849 Auiki Street, Honolulu, HI

**Meeting Date: April 28, 2026 at 9 am**

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

My name is Pauline Sato and I am testifying as an individual and part-time resident of Moloka'i. In September of 2025, I was very pleased with the decision of the Board of Agriculture and Biosecurity (BAB) to pass the Interim Rule to Restrict the Transportation of Material to the Island of Moloka'i to Prevent the Spread of CRB. The Moloka'i community came out strong to urge the BAB to come to this wise decision.

I am both puzzled and disturbed by the petition to initiate administrative rulemaking to amend the aforementioned interim rule to allow gravel to be moved from any other area in the State to the Island of Moloka'i if it has been subjected to an approved treatment prior to movement. This petition goes against the intent and purpose of the interim rule that was passed. It is important to allow the rule to run its full course before making amendments to it.

Additionally, if part of the reasoning is to test a new treatment method, could this not be done on another island first? Why Moloka'i? CRB is still a major cultural, biological, and economic threat and it is unwise to relax restrictions to protect the island of Moloka'i. The recent findings of dead CRB in traps on Moloka'i is of great concern, putting all of us on high alert.

Mahalo for your leadership and for the opportunity to provide testimony on this important matter.

Aloha,



Kaunakakai, Hawai'i