

‘ĀINA MOMONA

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April 28, 2026

To: 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 Julie Au and I am the Director of Communications for ‘Āina Momona, a Native Hawaiian non-profit based on Moloka‘i. ‘Āina Momona is a community organization dedicated to achieving environmental health and sustainability through restoring social justice and Hawaiian sovereignty. Our land base is in the Ka‘amola ahupua‘a of Moloka‘i where we are currently leading full scale ahupua‘a restoration, from the top of the mountain out to Keawanui fishpond. Our work focuses on traditional land management and restoration as well as restoring our food and agricultural systems. To this end, we are very concerned about the presence of CRB on Moloka‘i and the impact it will have on our community, our food security, and our vision for a sustainable Hawai‘i.

‘Āina Momona respectfully urges 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, 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 proposal.

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 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 time and for hearing our voices.

Me ka ha'aha'a,

Julie U'ilani Au
Director of Communications, 'Āina Momona

Department of Land and Natural Resources/Division of Forestry and Wildlife Comment/Testimony on Agenda Item IV.C.3: Initiation of Rulemaking for New Chapter 4-69, Hawai'i Administrative Rules

The Division of Animal Industry (DAB) proposes to establish a new Chapter 4-69, titled "Plant and Non-domestic Animal Quarantine Pest Designation Rules," and to incorporate by reference the existing list of "pests for control or eradication" from Chapter 4-69A as the quarantine pest list.

However, the current list in Chapter 4-69A was developed for control and eradication purposes—not for preventing new invasive species from entering Hawai'i. As such, it may not be appropriate for use as a quarantine pest list. Additionally, this list appears to be incomplete and outdated, as it was compiled in 2008 and does not reflect current threats or recent scientific understanding.

Given these limitations, the Board should consider developing a more accurate, comprehensive, and up-to-date pest list tailored specifically for prevention. Several years ago, the Hawai'i Invasive Species Council (HISC), through a collaborative, multi-agency effort, developed three relevant and well-vetted resources:

- **Prevention Priority Species List (2024)**
<https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Prevention-Priority-Species-List-APRIL-2024.pdf>
- **Limited Distribution Species List (2024)**
<https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Limited-Distribution-List-SEPT2024.pdf>
- **Flagship Invasive Species by Pathway (2022)**
<https://dlnr.hawaii.gov/hisc/files/2024/09/Flagship-invasion-prevention-species-by-pathway-APRIL-2022.pdf>

These lists were developed collaboratively by HISC member agencies and represent a strong foundation for building a more comprehensive and modern pest designation framework.

It is also important to recognize that any pest list is inherently dynamic. New species are continually being described and introduced, and it is impossible to predict all future threats. For this reason, regulatory emphasis should not rely solely on static species lists but also prioritize pathway-based prevention strategies that address how pests are introduced rather than merely which species are listed.

HISC members collectively offer substantial technical expertise and stand ready to collaborate with the Department to develop and maintain a scientifically robust, adaptive, and effective pest designation system.

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

From Christine Andrews <mauiwit@hotmail.com>

Date Tue 4/28/2026 3:12 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 Christine Andrews and I am a resident of Wailuku, 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, and urge 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 consider this controversial request.**

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,

Christine Andrews, JD

JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'
DEPARTMENT OF TRANSPORTATION | KA 'OIHANA ALAKAU
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April 27, 2026

Section C.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 Hawai'i Department of Transportation (HDOT) submits testimony in support of the petition to amend the interim rule concerning the movement of gravel to Molokai. HDOT recognizes the importance of allowing the timely movement of gravel necessary to support our residents in Kalaupapa Molokai.

At the same time, HDOT emphasizes that approval for the movement of gravel must remain contingent upon appropriate treatment and biosecurity safeguards. We acknowledge that gravel, soil, and related aggregate materials can serve as pathways for the spread of invasive species, pests, plant pathogens, fire ants, coqui frogs, and other harmful organisms that threaten agricultural lands, native ecosystems, and surrounding communities, and there are ways to allow movement with mitigation measures and safeguarding the material.

HDOT therefore supports the petition provided that movement is authorized only with required treatment, inspection, and mitigation measures as determined by the Department of Agriculture and Biosecurity and other regulatory agencies. Protecting Hawai'i's biosecurity while enabling the maintenance of essential infrastructure must remain the priority.

We are in support of using Profume gas fumigant SLN Hi-2501 to treat gravel going to Molokai as we have witnessed the treatment of host material both in trial settings on Oahu, as well as field work in Kona. In both settings, All life stages of Coconut Rhinoceros Beetle were killed. Another benefit is the treatment worked to mitigate Little Fire Ants, and Coqui frogs.

This balanced approach allows necessary maintenance to proceed responsibly while safeguarding the long-term health of Hawai'i's lands and communities.

Sincerely,

Signature:

A handwritten signature in blue ink, appearing to read "Ed Sniffen".

Email: edwin.h.sniffen@hawaii.gov

EDWIN H. SNIFFEN
Director of Transportation