

November 17, 2023

Office of the Governor
The Honorable Josh Green, M.D.
Governor, State of Hawai'i
Executive Chambers
State Capitol
Honolulu, Hawai'i 96813

Dear Governor Josh Green, M.D.,

We, the undersigned community organizations, write to urge you to ensure that a public hearing is held as soon as practicable on long-awaited rule amendments for the Hawai'i Department of Agriculture (HDOA), before we lose our chance to control and eradicate growing populations of little fire ants (LFA) and other invasive pest species that may inflict irreparable harm on our environment, our host culture, our food security, our public health, our economy, and our islands as a whole.

Without these rules, invasive species such as the LFA, Coconut Rhinoceros Beetle (CRB), Hala Scale, and Two-Lined Spittlebug can and will continue to spread across our islands. The proposed inspection and other requirements for the inter- and intra-island transport of known vectors of these pests, including commercially sold soil, plants, and plant products, are absolutely critical to preventing their further proliferation. **The eight month delay since a public hearing for these rules was approved by the Board of Agriculture in February has already risked devastating consequences for Hawai'i.**

On Hawai'i Island, uncontrolled infestations of LFA have been incredibly harmful to farmers, children, native species, and pets. Some people have suffered from anaphylactic shock following LFA stings. Seabirds and songbirds have no protection against these stinging ants, which have also been known to attack sea turtle hatchlings in other places like Florida. As LFA nests now appear to be spreading across O'ahu, the costs of controlling and eradicating this pest will only grow exponentially with time, as will the injuries that could be inflicted on residents, visitors, pets, and wildlife alike.

The CRB not only attacks coconut trees - devastating this culturally and economically significant resource on other Pacific islands - but also endangered native species such as the iconic loulu. Alarmingly, it has now been reported in numerous areas on O'ahu – including in commercially sold compost – as well as on Kaua'i. While we can still control and even eradicate this threat, its further spread over time may make this less and less possible.

The Hala Scale may also be devastating for our culturally significant hala (pandanus) trees, a foundation of numerous cultural practices and native ecosystems, if it is allowed to spread across and beyond Maui and O'ahu.

The Two-Lined Spittlebug has already had significant economic impacts on Hawai'i Island's agricultural industry, and has contributed to the takeover of invasive species across the landscape on the western region of the island. Its spread to other places on Hawai'i Island and to other islands could compromise our native watersheds, food security, water security, and climate resilience.

Overall, the continued proliferation of these species will have profound negative effects on our ecological integrity and biodiversity, cultural heritage, food security, climate resilience, public health, and economy.

Currently, interisland movement of plants infested with CRB is temporarily prohibited, but without broader protections including robust inspection and both inter- and intra-island transport requirements for commercially grown and sold plants, soil, compost, and other plant and garden products, continued invasion of these and other pests will be all but inevitable. These regulatory requirements are key features in the proposed rule amendments currently languishing under the current HDOA administration.

Alarmingly, after falsely representing that attorney general review was the reason for the delay in these rules' public hearing, HDOA officials have now openly admitted that the reason for the delay is because nursery industry representatives had privately called certain rule provisions "dealbreakers." This is not a reason to delay rulemaking - *if there are parts of the rules that need revisions, let the dialog begin at a public hearing with all parties invited.* In addition, we have been made aware that HDOA is now putting forward a replacement rule proposal that fails to regulate intra-island movement of plants and other goods known to be infested with LFA, CRB and other pests.

With all that is at stake, this complete deference to private corporate interests by your administration's officials is unacceptable.

Accordingly we urge you to please direct the HDOA to uphold its responsibility to protect our islands, and move forward with the rulemaking process for the rule amendments to HAR Chapter 4-72 as approved by the Board of Agriculture in February of this year.

Mahalo nui,

'Ahahui o Nā Kauka
Aloha 'Āina Legal Group
Boys and Girls Club of Hawai'i
Ceeds of Peace
Center for Biological Diversity
Conservation Council for Hawai'i
Council for Native Hawaiian Advancement

Environmental Caucus of the Democratic Party of Hawai'i
 Greenpeace Hawai'i
 Hanalei Watershed Hui
 Hawai'i Alliance for Progressive Action
 Hawai'i Audubon Society
 Hawai'i Land Trust
 Hawai'i Youth Climate Coalition
 Ho'ōla Hou iā Kalauao
 Hui Ho'omalū i ka 'Āina
 King Kamehameha Hawaiian Civic Club
 Kua'āina Ulu 'Auamo
 Livable Hawai'i Kai Hui
 Papa Ola Lōkahi
 Partners in Development Foundation
 Sierra Club of Hawai'i
 Wai'anae Economic Development Council



Environmental Caucus of
 The Democratic Party of Hawai'i





PARTNERS IN DEVELOPMENT
FOUNDATION



HAPA
HAWAII ALLIANCE for PROGRESSIVE ACTION



HUI HO'OMALU I KA 'AINA
ADVOCATES FOR NATIVE KNOWLEDGE

