

DAVID Y. IGE
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CRAIG K. HIRAI
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HAWAII EMPLOYER-UNION HEALTH BENEFITS TRUST FUND
OFFICE OF THE PUBLIC DEFENDER

STATE OF HAWAII
DEPARTMENT OF BUDGET AND FINANCE
P.O. BOX 150
HONOLULU, HAWAII 96810-0150

ADMINISTRATIVE AND RESEARCH OFFICE
BUDGET, PROGRAM PLANNING AND
MANAGEMENT DIVISION
FINANCIAL ADMINISTRATION DIVISION
OFFICE OF FEDERAL AWARDS MANAGEMENT (OFAM)

WRITTEN ONLY
TESTIMONY BY CRAIG K. HIRAI
DIRECTOR, DEPARTMENT OF BUDGET AND FINANCE
TO THE SENATE COMMITTEE ON WAYS AND MEANS
ON
HOUSE BILL NO. 80, H.D. 1

April 7, 2021
9:40 a.m.
Conference Room 211 and Videoconference

RELATING TO THE LOW-INCOME HOUSING TAX CREDIT

The Department of Budget and Finance (B&F) offers comments on House Bill (H.B.) No. 80, H.D. 1.

H.B. No. 80, H.D. 1, clarifies when and how members or partners of a taxpayer may claim the Low-Income Housing Tax Credit; requires a Form 8609 for purposes of claiming the tax credit; specifies the application of tax provisions with respect to buildings or projects placed in service after December 31, 2020; and extends the sunset date of Act 129, SLH 2016, to December 31, 2027.

B&F is concerned that the proposed measure would decrease revenues to the State general fund and impact the State's share of direct federal aid from the American Rescue Plan Act of 2021 (ARPA). Provisions of the ARPA specifically state:

"A state or territory shall not use the funds provided under this section or transferred pursuant to section 603(c)(4) to either directly or indirectly offset a reduction in the net tax revenue of such state or territory resulting from a change in law, regulation, or administrative interpretation during the covered period that

reduces any tax (by providing for a reduction in a rate, a rebate, a deduction, a credit, or otherwise) or delays the imposition of any tax or tax increase.”

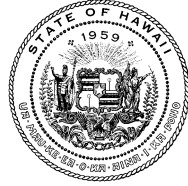
B&F notes that any reduction in State tax revenues could result in reduced ARPA funding. Hawai'i's estimated allocation of ARPA funds is in excess of \$1.6 billion and is critical to mitigating the negative financial impacts the COVID-19 pandemic has had on the State budget.

B&F defers to the Department of Taxation regarding the implementation of this bill.

Thank you for your consideration of our comments.

DAVID Y. IGE
GOVERNOR

JOSH GREEN M.D.
LT. GOVERNOR



ISAAC W. CHOY
DIRECTOR OF TAXATION

STATE OF HAWAII
DEPARTMENT OF TAXATION
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To: The Honorable Donovan M. Dela Cruz, Chair;
The Honorable Gilbert S.C. Keith-Agaran, Vice Chair;
and Members of the Senate Committee on Ways and Means

From: Isaac W. Choy, Director
Department of Taxation

Date: April 7, 2021
Time: 9:40 A.M.
Place: Via Video Conference, State Capitol

Re: H.B. 80, H.D. 1, Relating to the Low-Income Housing Tax Credit

The Department of Taxation (Department) supports the intent of H.B. 80, H.D. 1, and offers the following comments for your consideration.

H.B. 80, H.D. 1, has a defective effective date of July 1, 2050 and otherwise applies to taxable years beginning after December 31, 2020. The bill amends the Low-Income Housing Tax Credit (LIHTC) provided under Hawaii Revised Statutes (HRS) section 235-110.8 by:

- Allowing the LIHTC to be allocated among the partners or members of the taxpayer in any manner chosen by the parties regardless of whether the partner or member is deemed a partner for federal income tax purposes;
- Allowing individuals or entities to be admitted to the partnership after the end of the taxable year, but before the individual or entity files its tax return;
- Extending the sunset date of the changes made by Act 129, Session Laws of Hawaii 2016, from December 31, 2021 to December 31, 2027;
- Allowing the LIHTC to be claimed for the first-year based on the carryover allocation letter or section 42(m) letter if Form 8609 has not been received by the taxpayer;
- Relaxing the installment method, at-risk, and passive activity loss rules for qualified low-income buildings placed in service after December 31, 2020;
- Limiting the relaxation of the installment method, at-risk, and passive activity loss rules to buildings that maintain their status as qualified low-income buildings; and
- Prohibiting the state deductions and expenses claimed by all Hawaii taxpayers on Hawaii income tax returns from exceeding the amount of deductions and expenses claimed by all taxpayers on federal returns.

The Department notes that generally a taxpayer's attributes are set on the final day of the taxable year. Acquisition of an interest in an entity such as a partnership does not apply retroactively. As such the Department strongly suggests that the amendment to subsection (b) that allows individuals or entities to be admitted to the partnership after the end of the taxable year, but before the individual or entity files its tax return be deleted. It is unclear why this provision is necessary and whether it supports the intent of increasing the availability of low-income housing in Hawaii.

In order to address these concerns, the Department respectfully requests that the following amendments be made to this measure:

Amend page 2, lines 1 through 6 to read: credit under this section may be allocated by the partnership or limited liability company the entity in any manner agreed to by the partners or members parties regardless of whether the individual or entity to receive the credit is deemed to be a partner or member for federal income tax purposes, so long as the individual or entity is deemed to be a partner or member pursuant to applicable state law.

Delete page 2, lines 9 through 15: For indivual or entities that are deemed to be a partner or member of the taxpayer pursuant to applicable state law, those individuals or entities shall have been admitted to the taxpayer pursuant to applicable state law on or prior to the date of filing their respective tax return, including any amendments thereto, with respect to the year of the tax credit.

Finally, the Department notes that P.L. 117-2, commonly known as the American Rescue Plan Act of 2021 (ARPA), provides State Coronavirus Fiscal Recovery Funds with certain limitations. Specifically, Section 9901 of the ARPA prohibits these funds from being used to, "either directly or indirectly offset a reduction in the net tax revenue of such State or territory resulting from a change in law, regulation, or administrative interpretation during the covered period that reduces any tax (by providing for a reduction in a rate, a rebate, a deduction, a credit, or otherwise) or delays the imposition of any tax or tax increase." The "covered period" is defined as beginning on March 3, 2021 and ending on the last day of the state's fiscal year in which the State's stimulus funds are completely expended.

If the State fails to comply with this restriction on use of funds, it is required to repay an amount equal to the lesser of: (1) the amount of the applicable reduction to net tax revenue attributable to such violation; and (2) the amount of funds received by such state under Section 9901 of the ARPA.

The Department cautions that the enactment of any tax measure resulting in a revenue loss during the covered period may result in the State having to repay an amount equal to the projected revenue loss from the State Coronavirus Fiscal Recovery Funds that Hawaii receives.

Thank you for the opportunity to provide testimony regarding this measure.

TAX FOUNDATION OF HAWAII

126 Queen Street, Suite 304

Honolulu, Hawaii 96813 Tel. 536-4587

SUBJECT: INCOME, Low-Income Housing Credit, Allocations

BILL NUMBER: HB 80, HD1

INTRODUCED BY: House Committee on Housing

EXECUTIVE SUMMARY: Clarifies when and how members or partners of a taxpayer may claim the low-income housing tax credit. Requires a Form 8609 for purposes of claiming the tax credit. Specifies the application of tax provisions with respect to buildings or projects placed in service after 12/31/2020. Extends the sunset date of Act 129, Session Laws of Hawaii 2016, to 12/31/2027. Effective 7/1/2050.

SYNOPSIS: Amends section 235-110.8, HRS, to provide that the low-income housing tax credit may be allocated among the partners or members of the taxpayer earning the credit in any manner agreed to by such parties regardless of whether the individual or entity to receive the credit is deemed to be a partner or member for federal income tax purposes, so long as the individual or entity is deemed to be a partner or member pursuant to applicable state law.. In addition, any allocation of a tax credit under this section may be made among the partners or members of a taxpayer in accordance with the immediately preceding sentence provided such partners or members have been admitted to the taxpayer in accordance with applicable state law on or prior to the date for filing the partner's or member's tax return (including any amendments thereto) with respect to the year of the tax credit.

Requires the claimant to shall include a copy of Form 8609 issued by the corporation with respect to the building; provided that with respect to the first year that the credit is claimed for a qualified low-income housing project, if the taxpayer has not yet received the Form 8609 prior to the time the taxpayer files its original tax return claiming the credit under this section, the taxpayer may claim the credit based upon the amount of credit set forth in the carryover allocation or 42(m) letter, as applicable, issued to the qualified low-income housing project, and upon receipt of the Form 8609, the taxpayer shall: (1) Amend its tax return to include the Form 8609; and (2) If the credit amount in the Form 8609 is different than the amount of credit previously claimed, adjust the credit amount claimed on its amended return.

Amends section 235-110.8, HRS, to state that for any qualified low-income building that is placed in service after December 31, 2020:

(1) Section 453 (with respect to the installment method), section 465 (with respect to deductions limited to amount at risk), and section 469 (with respect to passive activity losses and credits limited) of the Internal Revenue Code shall not be operative with respect to investments made in buildings and projects claiming the credit under this section;

(2) All allocations to partners of their distributive shares of income, loss, and deductions under chapter 235 shall be made in accordance with the written agreement of the partners or members;

(3) The total amount of state credits allocated by the corporation for the qualified low-income building shall not exceed fifty per cent of the amount of federal credits allocated to the building for the ten-year federal credit period; and

(4) The state depreciation basis of the qualified low-income building shall not exceed the federal depreciation basis of the building.

Disqualifies any building that ceases to serve low-income households in accordance with federal and state low-income housing tax credit programs.

EFFECTIVE DATE: 7/1/2050.

STAFF COMMENTS: Act 216, SLH 1988, adopted for Hawaii purposes the federal low-income rental housing credit that was part of the Tax Reform Act of 1986. The credit was enacted to offset the repeal of tax shelters and other incentives to build rental housing under prior law, such as accelerated depreciation, capital gains preference, certain tax-exempt bonds, and to specifically target low-income rentals.

On the federal level, the tax credits and losses attributable to such a project are limited by a series of complex rules, including:

At-Risk Rules

For individuals, estates, trusts, and closely held C corporations, deductions of business- or investment-related losses from an activity for a tax year are limited to the amount the taxpayer is at risk. The amount at risk includes: (1) the amount of money and the adjusted basis of property contributed to an activity; (2) amounts borrowed with respect to the activity to the extent the taxpayer is personally liable for repayment or has pledged property, other than property used in the activity, as security for the borrowed amount; and (3) generally, amounts borrowed with respect to the activity of holding real property for which no person is personally liable for repayment (qualified nonrecourse financing). The amount at risk is also increased by the excess of items of income from an activity for the tax year over items of deduction from the activity for the tax year.

Unlike a partner's tax basis, the amount at risk can go negative, although not from recognition of losses. The consequence of a negative at-risk amount is the potential for at-risk recapture, which is the recognition of previously deducted losses as income in a year in which a taxpayer's amount at risk is negative, often as the result of a distribution. Recognition of at-risk recapture increases a partner's amount at risk.

Passive Activity Loss Rules

Passive activity loss rules are a set of IRS rules that prohibit using passive losses to offset earned or ordinary income. Passive activity loss rules prevent investors from using losses incurred from income-producing activities in which they are not materially involved.

Being materially involved with earned or ordinary income-producing activities means the income is active income and may not be reduced by passive losses. Passive losses can be used only to offset passive income.

The key issue with passive activity loss rules is material participation. According to IRS Topic No. 425, “material participation” is involvement in the operation of a trade or business activity on a “regular, continuous, and substantial basis.” If the taxpayer does not materially participate in the activity that is producing the passive losses, then those losses can only be matched against passive income. If there is no passive income, then no loss can be deducted. However, rental activities, including real estate rental activities, are considered passive activities even if there is material participation (“real estate professionals” cannot benefit from this exception).

Passive activity losses can only be applied in the current year, and if they exceed passive income they can be carried forward without limitation; they cannot be carried back.

In general, passive activity loss rules are applied at the individual level, but they also extend to virtually all businesses and rental activity in various reporting entities, except C corporations, to deter abusive tax shelters.

The proposal here is to make these rules inapplicable to investments in low-income housing projects.

Technical Concerns

The current draft provides that the low-income housing tax credit may be allocated among the partners or members of the taxpayer earning the credit in any manner agreed to by such parties regardless of whether the individual or entity to receive the credit is deemed to be a partner or member for federal income tax purposes, so long as the individual or entity is deemed to be a partner or member pursuant to applicable state law. That may confuse the partnership law definition of partner with the tax law definition of partner. The tax law definition of partner could be influenced by entity classification elections made at the entity level. For example, a limited liability company could elect to be a corporation for tax purposes, in which case no credit allocation is appropriate even though unit holders in the corporation are members pursuant to state law. Rather, the provision should depend on whether the individual or entity to receive the credit is deemed to be a partner for state income tax purposes.

The current draft contains a proviso that this subsection shall not apply to any building that ceases to serve low-income households in accordance with federal and state low-income housing tax credit programs. This standard is vague and may result in an entity being disqualified for spurious reasons.

American Rescue Plan Act Prohibition

The American Rescue Plan Act of 2021, signed into law by President Biden on March 11, 2021, contains provisions disqualifying or restricting federal aid that otherwise could be available to the State if new or extended tax incentives are enacted after March 3, 2021. Section 9901 of the Act enacts a new section 602(c)(2)(A) in Title VI of the Social Security Act which states:

A State or territory shall not use the funds provided under this section or transferred pursuant to section 603(c)(4) to either directly or indirectly offset a reduction in the net tax revenue of such State or territory resulting from a change in law, regulation, or administrative interpretation during the covered period that reduces any tax (by providing for a reduction in a rate, a rebate, a deduction, a credit, or otherwise) or delays the imposition of any tax or tax increase.

Section 602(g)(1) defines the “covered period” as beginning on March 3, 2021 and ending on the last day of the State’s fiscal year in which all federal aid dollars are either spent, returned, or recovered against the State by the Treasury.

The bill overall appears to be a revenue loser and for that reason appears to be problematic because of the language of the American Rescue Plan Act quoted above.

Digested 4/2/2021

Sandra-Ann Y.H. Wong

Attorney at Law, a Law Corporation

1050 Bishop Street, #514

Honolulu, Hawaii 96813

**TESTIMONY IN SUPPORT OF HB 80, HD1
SENATE COMMITTEE ON WAYS AND MEANS
WEDNESDAY, APRIL 7, 2021 at 9:40 A.M.**

Aloha Chair Dela Cruz, Vice Chair Keith-Agaran, and Members of the Committee:

On behalf of Dowling Company, Inc., thank you for the opportunity to provide testimony in support of HB 80, HD1.

Dowling Company, Inc. supports this measure because it aims to expand the market of tax credit buyers and in turn, increase the price paid for these credits. A broader and more competitive marketplace for these tax credits will compel higher equity pricing and result in more affordable units in Hawaii.

Thank you for the opportunity to testify in support of this measure.



MAUI
CHAMBER OF COMMERCE
VOICE OF BUSINESS

**HEARING BEFORE THE SENATE COMMITTEE ON WAYS AND MEANS
HAWAII STATE CAPITOL, SENATE CONFERENCE ROOM 211
WEDNESDAY, APRIL 7, 2021 AT 9:40 A.M.**

To The Honorable Donovan M. Dela Cruz, Chair;
The Honorable Gilbert S.C. Keith-Agaran, Vice Chair; and
Members of the Committee on Ways and Means,

SUPPORT HB80 HD1 RELATING TO THE LOW-INCOME HOUSING TAX CREDIT

Aloha, my name is Pamela Tumpap. I am the President of the Maui Chamber of Commerce, in the county most impacted by the COVID-19 pandemic in terms of our dependence on the visitor industry and corresponding rate of unemployment. I am writing to share our support of HB80 HD1.

The Maui Chamber of Commerce strongly supports affordable housing and rentals. We appreciate that this bill will expand the market for low-income housing tax credits, thus driving up demand and increasing their price, which will provide more funding for the creation of new low-income housing units. Low-income housing tax credits are critical to getting more affordable housing and rentals built and without this bill, we understand fewer units will get built each year. We cannot afford to lose potential units as we are in a housing crisis.

Mahalo for your consideration of our testimony and ask that you please pass this bill.

Sincerely,

Pamela Tumpap
President

To advance and promote a healthy economic environment for business, advocating for a responsive government and quality education, while preserving Maui's unique community characteristics.



Hunt Companies, Inc.
737 Bishop St., Suite 2750
Honolulu, HI 96813
808-585-7900

Senator Donovan Dela Cruz, Chair
Senator Gilbert Keith-Agaran, Vice Chair
Committee on Ways and Means

RE: **HB 80 HD1 Relating to the Low-Income Housing Tax Credit – In Strong Support**
April 7, 2021; 9:40 AM; via Videoconference

Aloha Chair Dela Cruz, Vice Chair Keith-Agaran and members of the committee:

Hunt Companies – Hawaii and Hunt Capital Partners LLC appreciate this opportunity to submit testimony in strong support of HB 80 HD1, which clarifies when and how members or partners of a taxpayer may claim the low-income housing tax credit, requires a Form 8609 for purposes of claiming the tax credit and specifies the application of tax provisions with respect to buildings or projects placed in service after 12/31/2020. It also extends the sunset date of Act 129, Session Laws of Hawaii 2016, to 12/31/2027.

This bill aims to expand the market of tax credit buyers and in turn, increase the price paid for these credits. A broader and more competitive marketplace for these tax credits will compel higher equity pricing and result in more affordable units in Hawaii.

We respectfully request your consideration of the following amendments to address concerns raised by the Department of Taxation:

- **Line 1 of page 2 – replace “entity” with “the partnership or limited liability company”;**
- **Line 2 of page 2 - replace “parties” with “partners or members”; and**
- **Delete lines 9-15 on page 2, beginning with “For individuals or entities that . . . “**

Thank you for all your efforts to address Hawaii’s affordable housing crisis. We ask for your favorable consideration in passing HB 80 HD1 with our requested amendments.

Steven W. Colón
President – Hawaii Division

Jeff Weiss
President, Hunt Capital Partners, LLC



TESTIMONY IN SUPPORT OF HB80 HD1

HAWAII STATE SENATE
COMMITTEE ON WAYS AND MEANS

Wednesday, March 7, 2021

Aloha Chair Dela Cruz, Vice Chair Keith-Agaran and Members of the Committee:

My name is Christopher Abbott and I lead the affordable housing initiatives at Bank of Hawaii.

Bank of Hawaii supports HB80 HD1 which, among its provisions, clarifies when and how members or partners of a taxpayer may claim the state low-income housing tax credit, specifies the application of tax provisions with respect to buildings or projects in service in 2021 and later, and extends to December 31, 2027 the sunset date of the state low-income housing tax credit finance tool created by Act 129, Session Law of Hawaii 2016.

This bill would bring additional financial support for the development of affordable housing across the state and would help address the affordable housing crisis in Hawaii, especially during this economic downturn. The provisions to broaden the definition of members or partners of a taxpayer which may claim the state low-income housing tax credit would come at little to no cost to the State, while simultaneously supporting the pricing of the state low income housing tax credit to project sponsors.

As the Hawaii Housing Finance and Development Corporation noted in testimony earlier this year, this legislation would support efforts to maximize the value of the State Low Income Housing Tax Credit, which would increase the available equity and the feasibility of the construction and operation of affordable rental housing developments across the State.

Thank you for the opportunity to submit testimony in support of HB80 HD1.

▪ April 5, 2021

The Honorable Donovan M. Dela Cruz, Chair
The Honorable Gilbert S.C. Keith-Agaran, Vice Chair
And Members Of The Senate Committee On Ways And Means

**RE: Testimony In Support Of HB80, HD1 Relating To Low-Income Housing Tax Credit
Wednesday, April 7, 2021; 9:40AM; Conference Room 211 & Videoconference**

Dear Chair Dela Cruz, Vice Chair Keith-Agaran and Committee Members,

My name is Stanford S.C. Carr and I am the President of Stanford Carr Development, LLC. We are a local development firm that has worked to provide increased affordable housing opportunities for our local residents. I am offering testimony in support of HB80, HD1 which, among its key provisions, clarifies when and how members or partners of a taxpayer may claim the low-income housing tax credit; specifies the application of tax provisions with respect to buildings or projects placed in service after December 31, 2020; and extends the sunset date of Act 129, Session Laws of Hawaii 2016 to December 31, 2027. I would respectfully ask this committee to delete the delayed effective date of this important measure.

This bill will expand the pool of investors and thereby enhance the opportunities for affordable housing developers to raise the necessary equity to finance their projects. Moreover, this measure provides a check and balance mechanism that regulates who and when the State Low-Income Housing Tax Credit (LIHTC) may be taken, and is a good move towards providing more investors an opportunity to participate in the LIHTC program.

Moreover, extending the sunset date of the amendments made to the State LIHTC program under Act 129, Session Laws of Hawaii 2016 by an additional six years is clearly warranted and necessary. Since its enactment, Act 129 has helped to enhance the value of the State LIHTC and make it more attractive to potential investors which could generate more equity to finance affordable housing projects in the future. This is important because the LIHTC program has been a critical financing tool that has enabled the development of badly needed affordable rental housing in Hawaii.

For all of these reasons, I ask this committee to pass HB80, HD1. Thank you for the opportunity to submit testimony on this important measure.



Stanford S. Carr

Testimony of Sugar Creek Capital

LATE

Senate Committee on Ways & Means

Thursday, April 7, 2021
9:40 p.m.
State Capitol, Conference Room 211

On the following measure:

H.B. 80 HD1, RELATING TO THE LOW-INCOME HOUSING TAX CREDIT

Aloha Chair Dela Cruz, Vice-Chair Keith-Agaran and Members of the Committee:

Sugar Creek Capital specializes in state low-income housing tax credit investments that benefit working families and fixed-income seniors across the state and the country.

After further discussion with the Department of Taxation, **Sugar Creek Capital testifies in support of HB 80 HD1 with amendments.**

Key Points about LIHTC:

- Hawaii's state affordable housing tax credit is a long-standing, proven tool that allows for thousands of Hawaii residents to live with dignity.
- The proposed measures in HB 80 HD1 will allow for this program to serve even more Hawaii residents at little to no cost to the state.
- Affordable housing developers use Hawaii tax credits to raise equity from investors. With these tax credit equity investments, rents in these units stay well below market rate rents far into the future.
- Affordable housing tax credit investors sell these credits to Hawaii taxpayers who then in turn use them to offset their tax liability.

Proposed Amendments:

These proposed amendments aim to provide clarification to the LIHTC process, ensure alignment with the tax code and protect federal funding under the ARP act.

- Page 2, (b), line 1-4: amend the following:

“...credit under this section may be allocated by the entity [the partnership or limited liability] in any manner agreed to by the parties [partners or members] regardless of whether the individual or entity to receive the credit is deemed to be a partner or member for federal income tax purposes...”

- Page 2, (b), lines 9 - 15: delete the following:

~~“For individuals or entities that are deemed to be a partner or member of the taxpayer pursuant to applicable state law, those individuals or entities shall have been admitted to the taxpayer pursuant to applicable state law on or prior to the date of filing their respective tax return, including any amendments thereto, with respect to the year of the tax credit.”~~

- Adding a new section:

“SECTION 5. If there is a determination that any provision of this Act would directly or indirectly result in a reduction of net tax revenue of the State in violation of Section 602(c)(2)(A) of the American Rescue Plan Act of 2021 (the “ARP Act”), then such provision shall be deemed repealed during the covered period as defined under the ARP Act, but shall be automatically re-enacted upon expiration of the covered period.”

We respectfully request this Committee pass HB 80 HD1 out with the proposed amendments so we can continue to address the incredible housing need in Hawaii.

Mahalo for the opportunity to provide testimony.

HB-80-HD-1

Submitted on: 4/3/2021 7:59:25 PM

Testimony for WAM on 4/7/2021 9:40:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Jennifer Azuma Chrupalyk	Individual	Comments	No

Comments:

There shouldn't be any tax credits given to those new developments who have only a handful of "affordable" units, that are usually built on top of Hawaiian burials, or in direct violation of LCA and RP property rights. Furthermore, your affordable housing programs work very well for people who move here to take jobs, but they do nothing for the people of Hawai'i who pay taxes and vote you into office. If you want to make things right with taxpaying citizens of Hawai'i, perhaps you would consider raising minimum wages. Did you know that although corporations go by what you have outlined as minimum wage, they often feel sorry for residents? You have to wonder why nobody has respect for the manner in which living standards and government affairs are managed in Hawai'i. Let's commit to a higher sense of collective evolution and cut some of the corruption.