

**JOSH GREEN, M.D.**  
Governor

**SYLVIA LUKE**  
Lt. Governor



**SHARON HURD**  
Chairperson, Board of Agriculture

**DEAN M. MATSUKAWA**  
Deputy to the Chairperson

State of Hawai'i  
**DEPARTMENT OF AGRICULTURE**  
KA 'OIHANA MAHI'AI  
1428 South King Street  
Honolulu, Hawai'i 96814-2512  
Phone: (808) 973-9600 FAX: (808) 973-9613

**TESTIMONY OF SHARON HURD  
CHAIRPERSON, BOARD OF AGRICULTURE**

**BEFORE THE SENATE COMMITTEES ON AGRICULTURE AND ENVIRONMENT,  
TRANSPORTATION AND CULTURE AND THE ARTS, AND COMMERCE AND  
CONSUMER PROTECTION**

**FEBRUARY 6, 2025  
9:30 AM  
CONFERENCE ROOM 224 & VIDEOCONFERENCE**

**SENATE BILL NO. 1100  
RELATING TO INVASIVE SPECIES**

Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, and Fukunaga,  
and Members of the Committees:

Thank you for the opportunity to testify on Senate Bill 1100 relating to biosecurity. This bill renames the Department of Agriculture as the Department of Agriculture and Biosecurity; establishes a Deputy Chairperson for Biosecurity; requires the Department of Agriculture and Biosecurity to establish an emergency response team to respond to biosecurity events; authorizes the department to establish transitional facilities and private inspectors to inspect imported plants and animals; requires inspection of various items transported interisland; increases penalties for illegally transporting plants, animals, and microorganisms; requires the department to establish government-industry agreements to detect and respond to unwanted organisms in Hawai'i; authorizes pest management plans to address, contain, or eradicate pests; transfers the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity; authorizes the Hawaii Department of Agriculture and Biosecurity to adopt rules to establish and enforce the plant care



component program; authorizes the Department of Agriculture and Biosecurity to assess administrative penalties for the enforcement of the program; and appropriates moneys.

The Department is in support of this measure, offers comments and suggested changes. The Department appreciates the emphasis on biosecurity as reflected by renaming the Department of Agriculture and Board of Agriculture to include “and Biosecurity” as part of the respective titles and making the same changes throughout the HRS, including permanent funding of the positions that were created under Act 231, SLH 2024. Section 19 of this bill further emphasizes biosecurity by establishing a new position with funding within the Department for a Deputy Chairperson of Biosecurity through a new section of HRS 141, further enabling the Department to maintain biosecurity activities.

On Page 41, regarding HRS 150A-A for Transitional facilities, the Department believes that the term “articles” needs clarification. The Department believes that HRS 150A-5 already defines specific articles that require inspection as the following: “. . . nursery-stock, tree, shrub, herb, vine, cut-flower, cutting, graft, scion, bud, seed, leaf, root, or rhizome; nut, fruit, or vegetable; grain, cereal, or legume in the natural or raw state; moss, hay, straw, dry-grass, or other forage; unmanufactured log, limb, or timber, or any other plant-growth or plant-product, unprocessed or in the raw state; soil; microorganisms; live bird, reptile, nematode, insect, or any other animal in any stage of development (that is in addition to the so-called domestic animal, the quarantine of which is provided for in chapter 142); box, vehicle, baggage, or any other container in which the articles have been transported or any packing material used in connection therewith. . .” It is the Department’s understanding that the Transitional facility program used by New Zealand is designed to manage the inspection of other classes of goods deemed to be of lower risk of pest introduction and are currently not subject to required inspections. As such, the Department suggests changing all references of “articles” in section 24 of this measure to “items” or some other similar term to ensure

there is a differentiation between the commodities that already require inspection pursuant to HRS 150A-5 and those that should be inspected at a transitional facility.

On Page 43, line 17, regarding a “private inspector”, the Department believes that this term could be confused with the existing definition of “inspector” already contained in HRS 150A-2. As such, the Department suggests changing all references of “private inspector” to “private assessor” or “private certifier” or something similar, to ensure there is no confusion, including the proposed definition on page 45, line 17. Additionally, if the aforementioned changes to “articles” are not made, the creation of private inspectors could also be a collective bargaining issue for the existing inspectors as they would both be tasked with inspecting the same regulated commodities. The Department also believes the private inspectors should have their licenses tied to the specific facility or facilities to which they are employed or authorized to conduct the inspections. This will enable better auditing of a transitional facility, as opposed to enabling transitional facilities to hire private inspectors at will. To effectuate this, the Department suggests the following language on page 44, beginning on line 11:

“. . . private inspector license shall be valid for one year, shall identify the specific transitional facility the private inspector is authorized to conduct inspections, and may be renewed under requirements established by the department.”

On page 45, beginning on line 11, the Department also suggests the following change for consistency with the above.

“(b) Unless authorized by the department, a licensed private inspector shall not certify any articles located outside a transitional facility where they are authorized to conduct inspections.”

The Department appreciates the proposed changes to HRS 150A-8 contained in section 27 of this measure, clarifying the specific commodities that are subject to inspections and clarifying when an inspection may occur.

The Department supports the intent of the proposed new section in HRS 150A regarding Pest management plans as this section seeks to provide a process that would enable anyone to potentially deem a specific organism as a pest and to vet specific management plans for said pest. However, the Department has some concerns that this section would be in conflict 4-69, HAR and would require the Department to implement and maintain a control or eradication program pursuant to HRS 141-3.5, for each pest designated in this manner.

Regarding the establishment of Hawaii Invasive Species Council (HISC) within the Department of Agriculture and Biosecurity, the Department believes that in order to fully effectuate this, HRS 194-2(b) should also be amended to remove the Department of Land and Natural Resources and replace it with the Department of Agriculture and Biosecurity. The Department notes that HISC's coordination efforts between the respective agencies is important and defers to the Legislature as to where HISC should ultimately be placed for the most effective use of its allocated resources.

The Department is supportive of the proposed changes to the plant care components program to enable the creation of rules and allow for the treatment of plant care components prior to importation into the State. The Department offers some suggested changes for clarity. On Page 83, Line 8, the proposed change below is necessary because as currently drafted all imported plant care components would require two treatments, one prior to importation and one after arrival in the state.

"(1) The plant care component was subject to a treatment prior to entering the State; [~~and~~] or  
(2) The plant care component has been treated immediately after [~~entering~~] arriving in the State, as certified by the department of agriculture and biosecurity."

The Department suggests amending the definition of "Plant care component" found on page 85, line 6 to clarify the specific types of wood chips or compost that are subject to regulation. There are other wood chips that are used for cooking, livestock or animal

bedding, fuel for fires, or processed for indoor decorative purposes, which present lower risks. The proposed amended definition is listed below:

"Plant care component" or "component" means any quantity of wood chips[~~r~~] or compost[~~r~~] that is used in the care or propagation of plants, or in a filter sock[~~s~~]."

The Department is in strong support of the funding for the positions contained in Act 231, SLH 2024, as this was an important milestone in cementing biosecurity as an investment priority for the State. Continued funding of these 44 positions in the Department's Plant Quarantine, Plant Pest Control, and Pesticides Branches it enables the Department to increase its ability to manage the introduction and spread of pests; ensure that pesticide use is safe and appropriate for public health and safety; and implement and maintain control, management, and biocontrol projects for existing pests across the State. The proposed increases in Plant Quarantine Branch staff for prevention are also critical for the State's overall biosecurity efforts.

Ultimately, while the Department is extremely supportive of this measure, the Department humbly requests that the Legislature consider a phased implementation of the measures contained within this bill to enable the Department to create the educational pathways to hire, train, and retain a large number of qualified individuals for the added positions, and to create the necessary rules for program implementation of the emergency response program, transitional facilities, and plant care component programs.

Thank you for the opportunity to testify on this measure.

JOSH GREEN  
GOVERNOR OF HAWAII

SYLVIA LUKE  
LIEUTENANT GOVERNOR



## HAWAII INVASIVE SPECIES COUNCIL

1151 PUNCHBOWL ST, #325  
HONOLULU, HAWAII 96813

### VOTING MEMBERS

**DAWN CHANG**  
DEPARTMENT OF LAND & NATURAL  
RESOURCES

**SHARON HURD**  
HAWAII DEPARTMENT OF AGRICULTURE

**KATHLEEN HO, D.Env**  
DEPARTMENT OF HEALTH

**PARWINDER GREWAL, Ph.D.**  
UNIVERSITY OF HAWAII

**MARY ALICE EVANS**  
BUSINESS, ECONOMIC DEVELOPMENT &  
TOURISM

**DEXTER KISHIDA**  
DEPARTMENT OF TRANSPORTATION

### Senate Committees on AGRICULTURE & ENVIRONMENT TRANSPORTATION AND CULTURE AND THE ARTS COMMERCE AND CONSUMER PROTECTION

Thursday, February 6, 2025

9:30 AM

State Capitol, Conference Room 229 and Via Videoconference

Chelsea Arnott, HISC Coordinator on behalf of  
HISC Co-Chair Sharon Hurd and Co-Chair Dawn N.S. Chang

### In consideration of SENATE BILL 1100 RELATING TO INVASIVE SPECIES

Senate Bill 1100 carries out a number of actions with the intention of improving biosecurity through the Hawai'i Department of Agriculture. **The Hawai'i Invasive Species Council (Council) provides comments on this measure.**

The Council appreciates the comprehensive approach to improve biosecurity in Hawai'i with broadening the scope of the Hawai'i Department of Agriculture with the addition of "biosecurity", highlighting the need for transitional facilities and inspectors. Also included in this measure is the Hawai'i Invasive Species Council being moved under the Department of Agriculture with language on page 73 Part VII that states "There is established the invasive species council within the department of agriculture and biosecurity...".

HISC is established through Hawaii Revised Statute 194. The Council's purpose is to provide statewide coordination and policy direction for the prevention and management of invasive species. It is co-chaired by the directors of the Departments of Agriculture and Land & Natural Resources, and representation from leadership at the Departments of Transportation, Health, Business and Economic Development and Tourism, and the University of Hawai'i. The Council is administered by the Department of Land & Natural Resources and is an autonomous forum not serving any one department or mission, but working with the overall purpose of coordinating department efforts to manage invasive species.

There are concerns with the HISC being under the oversight of any one department.

- 1) HISC loses the autonomy outlined in its statute and is subject to the mission of a single department rather than providing cross-sectoral support.
- 2) Over \$4M in state funds to support interagency project and programs across the State that are disbursed through a competitive process would be in jeopardy. With the administration through DLNR, the Council has received \$5.75m through LNR402. DLNR

supports the overall allocation of funding, additional requests that are submitted through the departments budget, the coordinator position for HISC, and the ability to leverage state funding.

- 3) HISC Program Support includes five staff members that oversee multiagency projects and products including the Port Monitoring Program, 643PEST.org, and the Hawaii-Pacific Weed Risk Assessment. The HISC Coordinator ensures that a portion of HISC funding supports those positions.

One recommendation that could address the criticisms about lack of coordination on biosecurity would be establishing Biosecurity Officer positions at each of the Council represented Departments. These positions would advise the Council and ensure that Council actions are not serving one department's agenda but rather the purpose of the Council defined in HRS 194. This would support better coordination and enhance the Council's effectiveness.

Mahalo for the opportunity to provide comments on this measure.

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAII'  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA

P.O. BOX 621  
HONOLULU, HAWAII 96809

DAWN N.S. CHANG  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

RYAN K.P. KANAKA'OLE  
FIRST DEPUTY

CIARA W.K. KAHAHANE  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

Testimony of  
DAWN N. S. CHANG  
Chairperson

Before the Senate Committees on  
AGRICULTURE AND ENVIRONMENT,  
TRANSPORTATION AND CULTURE AND THE ARTS, and  
COMMERCE AND CONSUMER PROTECTION

Thursday, February 6, 2025  
9:30 AM

State Capitol, Conference Room 229 and Via Videoconference

In consideration of  
SENATE BILL 1100  
RELATING TO BIOSECURITY

Senate Bill 1100 proposes to expand and restructure the Hawai'i Department of Agriculture's (HDOA) biosecurity efforts, including renaming HDOA to add "Biosecurity"; establishing a Deputy Chairperson for Biosecurity; establishing an emergency response team; establishing transitional facilities and private inspectors for imported plants and animals; requiring inspection of items transported interisland; authorizing pest management plans; and transferring the Hawaii Invasive Species Council (Council) from the Department of Land and Natural Resources (Department) to the new HDOA. **The Department offers the following comments.**

The Department currently administers the Council for administrative purposes only. The Legislature created the Council to provide policy-level direction, coordination, and planning among state departments, federal agencies, and international and local initiatives to prevent, control, and eradicate harmful invasive species throughout Hawai'i. The Council is a collaborative, six-agency body that invests in a shared vision and mandate. Those agencies are the Department, HDOA, UH, the Department of Health, the Department of Business, Economic Development and Tourism, and the Department of Transportation. The Department works with partners within a framework as recommended by the Interagency Biosecurity Plan to utilize existing resources, networks, and capacities to address biosecurity issues collectively and efficiently.

Effective prevention, management, and mitigation of invasive species impacts requires continuity of attention, responsiveness, and cohesive action. Interruptions in active management can cause setbacks or worsen environmental conditions. The work is continuous because the threats are continuous.

If a new biosecurity agency is established, the Department urges that the existing functions, funding, and operations of the Council remain intact until the new agency has the necessary capacity, rules and regulations, and community network to implement the mandates under the biosecurity plan. The Council has proven approaches, resources, and a collaborative network at its disposal to prevent, manage, and mitigate the impacts of invasive species. Disruptions in management could exacerbate existing invasive species threats and create gaps in protection at a time when continuity is essential.

The Department supports efforts to strengthen biosecurity. However, we urge the Legislature to ensure that the Council remains operational and adequately funded until the transition to a new structure is fully realized.

Mahalo for the opportunity to provide comments on this measure.

**SB-1100**

Submitted on: 2/5/2025 8:48:00 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Tiffani Keanini	Testifying for Kauai Invasive Species Committee	Comments	Written Testimony Only

Comments:



February 5, 2025

Senate Committee on Agriculture and Environment Committee  
Senate Committee on Transportation and Culture and the Arts  
Senate Committee on Commerce and Consumer Protection

Thursday, February 6, 2025, 9:30 am  
Conference Room 229 & Videoconference  
State Capitol, Honolulu, HI

**Testimony Providing Comments on SB 1100, *Relating to Biosecurity***

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, and Fukunaga, and Members of the Committees,

The Maui Invasive Species Committee (MISC) appreciates the enhanced focus on invasive species. The Hawai'i Department of Agriculture (HDOA) has long needed increased funding in general and in particular for biosecurity efforts. As one of the five Invasive Species Committees, MISC sees firsthand what happens when invasive plants, animals, insects, and diseases make it past our borders. MISC and MoMISC have very positive working relationships with Maui-based HDOA inspectors and plant pest control staff; we know how dedicated and hard-working they are. MISC also has positive relationships with the landscape community; they have been some of our most engaged and concerned supporters and have been among the first community members who report suspect coconut rhinoceros beetles, little fire ants, and rapid 'ōhi'a death. MISC and MoMISC also have been engaged in statewide initiatives and networks related to invasive species, including through the Hawai'i Invasive Species Council (HISC) and its working groups, and the Coordinating Group on Alien Pest Species. It is from the perspective of deep community engagement that we offer these comments.

1. Removal of autonomy and interagency character of the Hawai'i Invasive Species Council

SB 1100 proposes to move the Hawai'i Invasive Species Council (HISC) to within the Department of Agriculture and Biosecurity and would be overseen by a new Deputy Chairperson for Biosecurity. We respectfully request you reconsider this move or, at a minimum, delay and conduct a study to determine the need for and potential impacts of such a move. A year's delay would also allow time for a transition if the move goes forward.

Our concern about this proposed move stems from the following perspectives:

- HISC is a national model; the current system is not broken.
- HISC program management requires significant administrative time and resources; moving HISC at the same time HDOA is tasked with additional responsibilities seems overly ambitious.

MISC has been involved with the HISC program since its historic creation in 2003. Its mandate is to provide policy level direction, coordination, and planning among state departments, federal agencies, and international and local initiatives for the control and eradication of harmful invasive species infestations throughout the State. HDOA and DLNR were legislatively established as Co-Chairs, with equal power to manage the Council. This division of management responsibility reflects an understanding of both the impacts that invasive species have on agriculture and natural resources and the historic kuleana of these departments. As an observer of and participant of many HISC processes, this co-management seems to have worked extremely well.

The Council's interagency character, purpose, and mandate were visionary in 2003, and it continues to be a national model. A few highlights include: HISC participation in national and regional forums, including the Invasive Species Advisory Committee, which advises the National Invasive Species Council; HISC initiatives such as the Hawai'i Invasive Species Awareness Month (HISAM) have been recognized for promoting public engagement and education; a HISC-funded documentary "Saving Ōhi'a: Hawaii's Sacred Tree" received six Emmy nominations and won three awards from the National Academy of Television Arts and Sciences Pacific Southwest Chapter.

HISC funding also has been a critical line of support for prevention, early detection and rapid response, community control, outreach and education, and important research initiatives in areas such as coqui frogs, little fire ants, coconut rhinoceros beetles, and rapid 'ōhi'a death. HISC has provided critical support to the island-based Invasive Species Committees (ISCs), including helping to leverage HISC support with Maui County funding at a 3:1 ratio (County:State). On Maui, HISC funding has supported innovative solutions, including use of herbicide paintballs to treat remote infestations of miconia, helicopter and drone treatments of little fire ants, and development of delivery systems of a citric acid solution to treat coqui frogs in infested gulches. Grant management for the many different projects funded by HISC is a significant administrative task. Delays in the process will likely translate to furloughs or terminations of experienced staff with cascading impacts on control efforts.

We respectfully request the Committees preserve the HISC as an independent Council, guided by its co-chairs and members, and administratively attached to DLNR. If desired, the Committees could request the HISC to provide a summary of its accomplishments and challenges, along with an analysis of the pros and cons of moving administrative oversight to HDOA.

2. Authority to adopt permanent rules to regulate movement of pests or pest-infested material within a single island.

MISC does not understand the purpose in limiting HDOA's authority to regulate the movement of pests or pest-infested material within a single island. Without this authority, the department will not be able to suppress pests such as the coconut

rhinoceros beetle on a single island. Additionally, the ability to regulate materials that carry pests is a critical function. Please do not hamstring HDOA by including this amendment.

3. Addition of biosecurity experts to Board of Agriculture

Please consider adding a member from the invasive species response community and the environmental conservation community with biosecurity expertise to the Board of Agriculture (or its new name to include Biosecurity).

Mahalo for the opportunity to provide comments on this important piece of legislation.



Lissa Strohecker  
Acting MISC Manager

BIISC  
23 E. Kawili St.  
Hilo, HI 96720  
(808) 933-3340  
[www.biisc.org](http://www.biisc.org)



February 3, 2025

**Hearing: HEARING AEN-TCA-CPN 02-06-25**  
**RE: Comments on SB1100**

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs, and Members of the Committees,

As an organization that has worked on invasive species issues on the Big Island for 20 years, BIISC is very grateful and excited to see the interest that this legislature has taken in biosecurity. This bill includes some important measures that could significantly improve our state's ability to prevent and respond to new species incursions modeled on New Zealand's rigorous yet efficient system of inspections for incoming goods. We are highly encouraged and supportive of these measures.

However, we are concerned about the proposal to move the Hawaii Invasive Species Council under HDOA from where it has been for two decades, within DLNR. We understand that one intent of SB1100 is to model Hawaii's invasive species response on the world-recognized gold standard of New Zealand. However, all invasive species work in NZ is not done by a single entity. The first line of defense, the pre-border and at-border work at ports of entry for people and goods, falls to the Ministry of Primary Industries. But conservation of marine resources, forests, and watersheds - including management of widespread invasive species - falls to the NZ Department of Conservation. Strategies for fighting invasive organisms comes from Landcare Research. These agencies work in concert to mitigate the impacts of invasive species at a landscape scale, and the HISC has been the vehicle through which analogous departments in Hawai'i coordinate work on invasive species.

**The definition of invasive species, as stated in both federal and state law, is a non-native species that negatively impacts the *environment*, the *economy*, or the *human health* in an area.** Protecting agriculture is a key area of focus in invasive species work, but not the *only* area. This is why the HISC itself was set up by the 2002 legislature to include multiple state departments, in recognition of the broad nature of invasive species in affecting so many areas of our lives. The ISCs formed in recognition of the limitations of the mandates of each state agency: even with an interagency approach, there are still vulnerabilities in-between, such as invasive plants on private properties within communities that do not fall within any department's mandate. This is why ISCs are often referred to as the "gap-fillers."

From the beginning, the core mission of the ISCs has been finding, identifying, evaluating, and - if necessary and possible - controlling newly established (or arrived) invasive plants on our islands that may threaten not just the agricultural economy, but also our environment and the health of our community members.

The intersection of HDOA's authority with invasive plants falls under the Noxious Weed Rules (HAR Ch. 68). However, out of the 20+ plant species that BIISC controls regularly for eradication, containment, or exclusion, only two are state-listed Noxious Weeds: fountain grass and devil weed. All of our other target plants have been identified as high-risk by the Hawaii-Pacific Weed Risk Assessment, but are not designated state Noxious Weeds: that list has not been updated since 1992, a decade before the ISCs were formed and began systematically working to identify newly invading plants.

While most of our target plants pose significant environmental threats, at least three can cause severe reactions in humans, and one of those - rubbervine - is a noxious weed of agriculture in Australia that remains unlisted in Hawai'i. The flexibility of BIISC allows us to work on all of these plants, before they have significant impacts on agriculture, but also on state-managed lands and in communities. With that long-term view, HISC administrative staff at DLNR often go above and beyond in assisting us in finding additional funding for our work. Just last year, I was connected by the HISC staff to a US Dept of the Interior special one-time grant for eradication work, and BIISC became only one of 12 recipients nationwide to receive that grant. Because of this additional support on top of continuous HISC funding over the last decade, we will eradicate rubbervine from this island by 2028.

HISC competitive grants provide about half of the annual operating costs of the ISCs. Each year, a committee consisting of designees from each of the HISC agencies reviews the grant proposals and works together to prioritize funding for those projects that meet the HISC's strategy and agencies' priorities. There are many stumbling blocks in bureaucracies, but DLNR staff have streamlined and smoothed this process so that it functions in a reliable and consistent fashion. It is alarming when a process that is working well is proposed for significant change, without a clear immediate need or benefit. In my tenure as manager, we have never received funding from HDOA, so there is also very real concern about the future of BIISC's ability to deliver our programs to the community. BIISC has worked for a decade to provide extensive outreach, resources, and support to our community members on widespread invasive pests such as LFA, albizia, Queensland longhorn beetle, semi-slug/rat lungworm, and other invasives that have either never fallen under HDOA's mandates or are no longer active projects for HDOA on the Big Island.

Strengthening HDOA's pre- and at-border capabilities is an important goal that will require a significant amount of preparation and effort to roll out. However, asking that HDOA take on responsibility for all areas of invasive species management, including widespread pests and environmental threats, is not practical and takes away focus from that critical border work. This move would risk the loss of these programs by shifting into a narrow agriculture protection focus through HDOA, clearly not a desirable outcome of this otherwise well-intentioned legislation.

Thank you for taking the time to consider my comments. Please do not hesitate to contact me with any questions.

Mahalo,



Franny Kinslow Brewer  
Program Manager  
Big Island Invasive Species Committee  
[fbrewer@hawaii.edu](mailto:fbrewer@hawaii.edu)



## Officers

Kaipō Kekona  
State President

Anabella Bruch  
Vice-President

Maureen Datta  
Secretary

Reba Lopez  
Treasurer

## Chapter Presidents

Clarence Baber  
Kohala, Hawai'i

Tony Vera  
East Hawai'i

Puna, Hawai'i

Andrea Drayer  
Ka'u, Hawai'i

Maureen Datta  
Kona, Hawai'i

Fawn Helekahi-Burns  
Hāna, Maui

Mason Scharer  
Haleakalā, Maui

Kaiea Medeiros  
Mauna Kahālāwai,  
Maui

Kaipō Kekona  
Lahaina, Maui

Kilia Avelino-Purdy  
Molokai

Negus Manna  
Lāna'i

India Clark  
North Shore, O'ahu

Christian Zuckerman  
Wai'anae, O'ahu

Ted Radovich  
Waimānalo, O'ahu

Vincent Kimura  
Honolulu, O'ahu

Natalie Urminska  
Kauai

Aloha Chairs, Vice Chairs, and Committee Members,

The Hawai'i Farmers Union is a 501(c)(5) agricultural advocacy nonprofit representing a network of over 2,500 family farmers and their supporters across the Hawaiian Islands. **HFUU supports SB1100.**

HFU strongly supports the goal of improving Hawaii's biosecurity to protect our local agricultural industry, food systems, and environment. However, we offer the following recommendations to ensure that SB 1100 effectively balances biosecurity measures with the needs of local farmers and food producers:

### **Support for Strengthened Biosecurity Measures**

1. Emergency Response Team: We support the establishment of an emergency biosecurity response team to quickly contain invasive species outbreaks. We urge that agricultural stakeholders, including local farmers, be included in advisory roles to ensure responses are practical and effective.

2. Interisland Transport Inspection: Strengthening interisland transport regulations is critical to prevent the spread of invasive species. However, we recommend that additional funding be allocated for more inspection personnel to prevent delays in shipping fresh produce and agricultural goods.

3. Private Inspectors and Transitional Facilities: While we see potential in private inspectors improving efficiency, HFU urges careful oversight to ensure inspections remain consistent, affordable, and do not disproportionately burden small and medium-sized farmers.

### **Concerns and Recommendations**

4. Cost Burden on Farmers: While biosecurity is crucial, the bill's proposed fee structures and increased penalties should not impose excessive financial burdens on small-scale farmers who rely on timely and affordable transportation of goods. We recommend:

- Waivers or reduced fees for small-scale farmers.
- State-funded biosecurity support programs to offset potential costs.
- A clear appeals process for penalties that may be unfairly applied.

5. Implementation Timeline and Farmer Education: Adequate time must be provided for farmers to adapt to new requirements. Additionally, education and outreach programs should be developed to help farmers comply with the updated biosecurity regulations.

These proposed amendments, with specific references for placement, are provided on the following pages.

Mahalo for the opportunity to testify.

Hunter Heavilin  
Advocacy Director  
Hawai'i Farmers Union

**Amendment 1: Emergency Response Team (SECTION 22, §150A- New Section, Biosecurity Emergency Response Program)**

**Proposed Change:** Add the following subsection to §150A- (b):

(b) The chairperson shall allocate dedicated funding for rapid-response capabilities, including training programs for agricultural producers on biosecurity best practices. The department shall develop educational materials and conduct outreach to ensure farmers are adequately prepared to respond to biosecurity emergencies.

**Justification:** This ensures that local farmers are integrated into emergency response planning and have the resources to mitigate biosecurity risks effectively.

---

**Amendment 2: Interisland Transport Inspection (SECTION 27, §150A-8, Transporting in State)**

**Proposed Change:** Amend §150A-8(1) to include:

(1) Inspectional requirements. Any person who receives for transport, or brings or causes movement between the islands of the State, as freight, air freight, baggage, as ship's stores, or otherwise, any of the foregoing articles, shall ensure that the articles have been inspected prior to movement between the islands of the State and shall provide upon the inspector's request, the waybill number, container number, name and address of the consignor, name and address of the consignee or the consignee's agent, marks, number of packages, description of contents of each package, and any other information that may be necessary to inspect, locate, or identify the same. **The department shall establish risk-based inspection protocols to expedite the transport of agricultural products from farms or businesses with a demonstrated history of compliance.** If the articles are not inspected, the articles shall be held in a manner that they will not spread or be likely to spread any infestation or infection of insects, diseases, or pests that may be present until an inspection can be made by the inspector to determine whether or not any article, or any portion thereof, is infested or infected with insects, diseases or contains any pest.

**Justification:** Streamlines inspections for farmers who comply with biosecurity measures, reducing delays in the transport of fresh agricultural goods.

---

**Amendment 3: Private Inspectors and Transitional Facilities (SECTION 24, §150A-D, Private Inspector License)**

**Proposed Change:** Amend §150A-D to include the following subsections:

(g) The department shall establish oversight mechanisms to ensure uniformity and reliability in private inspections. Such oversight shall include periodic audits, review of inspection records, and adherence to standardized training protocols.

(h) The department shall establish a cap on fees charged by private inspectors to prevent excessive costs for small and medium-sized farmers.

(i) The department shall establish a dispute resolution process for farmers who contest private inspection findings, including an appeal mechanism through the board of agriculture and biosecurity.

**Justification:** Ensures fairness, affordability, and accountability in the private inspection system, preventing unnecessary financial burdens on farmers.

---

**Amendment 4: Cost Burden on Farmers (SECTION 29, §150A-14, Penalties and Fees)**

**Proposed Change:** Amend §150A-14(e) as follows:

(e) The department may, at its discretion, refuse entry, confiscate, or destroy any prohibited, restricted, or unlisted articles that are brought into the State without a permit issued by the department, or order the return of any plant, fruit, vegetable, or any other article infested with insects, diseases, or pests to its place of origin or otherwise dispose of it or such part thereof as may be necessary to comply with this chapter. **Any farmer operating under an annual gross income of \$250,000 shall be eligible for a fee waiver or reduction in penalties upon demonstrating financial hardship, as determined by the department.** Any expense or loss in connection therewith shall be borne by the owner or the owner's agent.

**Justification:** Provides financial relief for small-scale farmers facing biosecurity-related costs.

---

**Amendment 5: Implementation Timeline and Farmer Education (SECTION 22, §150A- New Section, Biosecurity Emergency Response Program)**

**Proposed Change:** Add a new subsection to §150A- (d):

(d) The department shall provide a minimum one-year grace period before full enforcement of new biosecurity regulations related to interisland transport, inspections, and penalties. During this period, the department shall develop and distribute farmer-friendly compliance guides, conduct workshops, and establish a dedicated hotline for farmers seeking guidance on regulatory changes.

**Justification:** Ensures that farmers have sufficient time to adapt to new biosecurity requirements before facing enforcement penalties.

These amendments strengthen SB 1100 by ensuring that biosecurity regulations are effective without imposing excessive burdens on small farmers. HFU urges the committee to adopt these proposed changes to support a fair and practical implementation of enhanced biosecurity measures.



The Senate  
Committee on Agriculture and Environment  
Committee on Transportation and Culture and the Arts  
Committee on Commerce and Consumer Protection  
Thursday, February 6, 2025  
9:30 am Conference Room 229 & Videoconference  
State Capitol

### **Testimony Providing Comments on SB 1100**

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, and Fukunaga, and Members of the Committees,

Thank you for the opportunity to provide testimony regarding SB 1100, *Relating to Biosecurity*.

The Coordinating Group on Alien Pest Species (CGAPS) appreciates the Legislature’s continued focus on invasive species. During the 2024 Legislative Session, the Legislature passed Act 231, landmark funding for the Hawaii Department of Agriculture’s (HDOA) biosecurity efforts. SB 1100 continues this momentum by providing new approaches to biosecurity in Hawaii and even proposes renaming HDOA as the Department of Agriculture and Biosecurity (HDOAB). It is critically important to invest in HDOA’s efforts to carry out their statutory responsibilities related to invasive species. After decades of lower funding amounts for HDOA’s capacity and activities related to invasive species, we note that HDOA has a lot of work ahead to rebuild and modernize its invasive species program.<sup>1</sup>

However, CGAPS is not in support of this bill and is providing comments due to concerns with the following sections:

#### **Removal of autonomy and interagency character of the Hawaii Invasive Species Council**

SB 1100 (Part VII, beginning on page 73, line 9) moves the Hawaii Invasive Species Council (HISC or Council) to “within the Department of Agriculture and Biosecurity,” and provides that HISC will be “overseen” by the new Deputy Chairperson for Biosecurity (page 23, line 2).

---

<sup>1</sup> For instance, HDOA’s administrative rules relating to invasive species are out of date. HDOA’s rules related to noxious weeds and the list of noxious weeds were last updated in 1992. (HAR Ch. 4-68). The list of pests designated for control or eradication was last updated in 2008. (HAR Ch. 4-69A Attachment 1) Section 141-3.5, Hawaii Revised Statutes, requires HDOA to develop and implement a control or eradication program for each designated pest, using the best available technology. To date, HDOA has not developed a program for any designated pest.

HISC is comprised of the chairs or directors of the Department of Land and Natural Resources (DLNR), Department of Health (HDOH), Department of Transportation (HDOT), Department of Business, Economic Development and Tourism (DBEDT), and the President of the University of Hawaii (UH), or their designees, for the purpose of “providing policy level direction, coordination, and planning among state departments, federal agencies, and international and local initiatives for the control and eradication of harmful invasive species infestations throughout the State.” (HRS 194-2) HISC is co-chaired by the Chairperson of HDOA and the Chairperson of DLNR. It is an independent council, guided by its co-chairs, and is attached to DLNR for administrative purposes only. (HRS 194-2(b))

Each State entity on the HISC has specific responsibilities for preventing and responding to invasive species. For example, HDOA’s authorities prevent pests from entering Hawaii from other states and spreading interisland. HDOH surveys and monitors for and controls invasive vectors and pathogens that affect public health. UH, among other things, carries out research and development on detection and control methods, and adaptive management techniques. DLNR has the authority to regulate biofouling and ballast water to prevent the introduction of aquatic invasive species and performs control and eradication actions for aquatic invasive species and for terrestrial invasive species on conservation lands. Demoting the Council to a part of HDOAB overseen by a Deputy of HDOAB defeats its interagency character, purpose, and mandate. The purpose of this demotion is unclear. It is also unclear if or how this shift might affect the annual competitive grants program that supports projects statewide and HISC staff functions such as the Hawaii-Pacific Weed Risk Assessment specialist.

**We respectfully request the Committees preserve the HISC as an independent Council, guided by its co-chairs and members, and administratively attached to DLNR by:**

1. Striking Part VII.
2. Striking sections 36 and 37.
3. Beginning on page 22, line 17, through page 23, line 2, amending the text to read as follows:

**“§141- Deputy chairperson of biosecurity; established.** (a) There is established within the department a deputy chairperson for biosecurity. The deputy chairperson for biosecurity shall oversee all of the State's department's biosecurity initiatives, including programs under chapters 142-and 150A, ~~and~~ 194 and sections 141-5, 261-4.5, and 266-21.5.”

## **Deputy Director of Biosecurity**

Part III of SB 1100 creates a new Deputy Chairperson for Biosecurity (DCB) and creates another new deputy position within HDOAB. These two positions would be exempt from Hawaii's civil service law and would not require a public hearing or the advice and consent of the Senate. Considering the DCB's critical responsibilities, it seems appropriate that each DCB appointee should require the advice and consent of the Senate as provided in section 6, article V, of the Hawaii State Constitution. Further, the amendments made to section 76-16, Hawaii Revised Statutes, (HRS) create two additional deputies or assistants within HDOAB that are exempt from Hawaii's civil service law. (Pg. 30, line 18, through pg. 31, line 3) It is unclear to us from the bill text why two new exempt positions should be created and what responsibilities they would be charged with.

### **We respectfully request the Committees provide for legislative oversight of the appointment of the new Deputy Chairperson for Biosecurity by:**

1. Amending page 23, lines 3 through 5, to read as follows:

“(b) The deputy chairperson for biosecurity shall be a deputy to the chairperson of the board of agriculture and biosecurity and be appointed, without regard to chapter 76, by the governor, with the advice and consent of the Senate.”
2. Striking the language proposed to be inserted beginning on page 30, line 18, through page 31, line 3.

## **Removal of authority to regulate movement of pests within an island under ch 150A HRS**

We appreciate the increased inspection authorities for live animals and plants and certain agricultural commodities moving between islands of the State in section 27 of SB 1100. (Beginning on pg. 58, line 16) Preventing pests from moving between islands is critical to containing and suppressing populations of pests already present in the State. However, we note that the deletions proposed to section 150A-8, HRS, beginning on page 58, line 18 through page 59, line 1, remove the authority for HDOAB to adopt permanent rules to regulate the movement of pests or pest-infested material within a single island. Without this authority, HDOAB will not be able to carry out any program to suppress pests such as the coconut rhinoceros beetle on a single island.<sup>2</sup> We also believe these intra-state authorities should explicitly apply to materials that carry pests and not just the pests themselves.

Further, we note that the amendments made by section 27: (1) repeat the “good cause” standard for inspections used in section 150A-5 HRS, which is not an appropriate inspection

---

<sup>2</sup> Section 141-2(2), HRS, authorizes HDOA to make rules governing the transportation of live plants and animals and certain agricultural products between different locations of any one island of the State. However, having similar authorities in chapter 150A HRS allows HDOAB to include intra-island programs within its biosecurity program and makes violations subject to penalties under section 150A-14 HRS.

standard;<sup>3</sup> (2) the authority to inspect all items moving between islands of the State, using the “good cause” standard exists in current law and is set out on page 53, lines 7-8 of SB 1100; and (3) will be a substantial change to HDOA’s current interisland inspection requirements under chapter 72, Hawaii Administrative Rules, (HAR) which may be difficult to roll-out without significant delays to passengers moving between islands.

**We respectfully request the Committees consider amending page 58, line 18, through page 59, line 1, to read as follows:**

**“§150A-8 Transporting in State.** (a) Flora and fauna and pest host material specified by rules and regulations of the department shall not be moved from one island to another island within the State or from one locality to another on the same island except by a permit issued by the department.

(b) The movement between the”

#### **Addition of biosecurity experts to the Board of Agriculture and Biosecurity**

Part II of SB 1100 renames HDOA as the Department of Agriculture and Biosecurity and the Board of Agriculture as the Board of Agriculture and Biosecurity. We applaud this expanded focus on broader issues of biosecurity. We believe the Board of Agriculture and Biosecurity should reflect this new focus by adding a member from the invasive species response community and the environmental conservation community with biosecurity expertise.

**We respectfully request the Committees consider adding a new section at the end of Part II of SB 1100 as follows:**

Sec. \_\_. Subsection (a) of section 26-16, Hawaii Revised Statutes, is amended to read as follows:

**“§ 26-16 Department of agriculture and biosecurity.** (a) The department of agriculture and biosecurity shall be headed by an executive board to be known as the board of agriculture and biosecurity. The board shall consist of ten members:

- (1) One who shall be a resident of the county of Hawaii;
- (2) One who shall be a resident of the county of Maui;
- (3) One who shall be a resident of the county of Kauai;
- (4) Four at large; and

---

<sup>3</sup> As the Hawaii Supreme Court noted in Eckard Brandes, Inc. v. Dep't of Lab. & Indus. Rels., 146 Haw. 354, 363 (2020), as corrected (Apr. 27, 2020): “Black’s Law Dictionary now defines ‘good cause’ as ‘[a] legally sufficient reason. Good cause is often the burden placed on a litigant (usu. by court rule or order) to show why a request should be granted or an action excused. Accordingly, we clarify that ‘good cause’ is ‘a sufficient reason, depending upon the circumstances of the individual case, and that a finding of its existence lies largely in the discretion of the court.’” (internal citations omitted)

(5) The chairperson of the board of land and natural resources; the director of business, economic development, and tourism; and the dean of the University of Hawaii college of tropical agriculture and human resources, or their designated representatives, who shall serve as ex officio, voting members.

The majority of the members of the board described in paragraphs (1) through (4) shall be from the agricultural community, ~~or the agricultural support sector[.],~~ the invasive species response community, or the environmental conservation community with demonstrated biosecurity expertise, with at least one member from each such category. The appointment, tenure, and removal of the members and the filling of vacancies on the board shall be as provided in section 26-34. The governor shall appoint a chairperson of the board from the members.”

### **Participation of state and local government employees on the Biosecurity Emergency Response Program**

Part IV of SB 1100 authorizes the Chairperson of HDOAB to provide pay and liability protections to a designated team of individuals who are not State or county employees, as “team members” who are selected by the Chairperson based on criteria established by the Chairperson and who receive pay as established by the Chairperson by rule (Pg. 37, lines 12 -15) to respond in the “event of an emergency due to a breach of the State’s biosecurity measures.”

“Team members” receive pay for each day of participation in continuing professional education and training and for each day of service if the Chairperson finds their “assistance is appropriate following a biosecurity event or emergency.” (Pg. 37, lines 16 -18)

We applaud efforts to prepare for a rapid response to the detection of a new high-impact invasive species or population. Hawaii already has a similar capacity with the island invasive species committees under UH, as well as other State and county employees. If the Governor declares an invasive species emergency under chapter 127A HRS, the response framework allows for engaging these personnel and the State also has the ability to contract with private companies to respond rapidly. HDOAB identifying entities that could be helpful in such a response in advance is good planning. However, paying non-governmental employees the Chairperson selects to be part of an ongoing team may be an inefficient use of State funds and could result in the appearance of inappropriateness.

Further, these rapid response measures appear to be only for control and eradication, not regulatory responses. To effectively respond to a new high-impact invasive species, HDOAB will need the authority to quarantine the area where the invasive species is detected, have the capacity to determine where the species is present, and provide rapid response to control the species in all infected/infested locations.

**We respectfully request the Committees consider amending Part IV of SB 1100 by:**

1. On page 36, line 17 through page 37, line 18, amend subsections (b) and (c) to read as follows:

~~“(b) The chairperson shall compile a list of qualified professionals who are willing to serve on an~~ organize an emergency response team, giving priority to ~~individuals~~ state and county employees having experience dealing with the containment and eradication of organisms. The chairperson shall ~~appoint at least one team of professionals from the list,~~ making ~~make~~ a reasonable effort to appoint at least one member from each island except Niihau. If a qualified representative cannot be appointed from each island, the chairperson, at a minimum, shall appoint one member from each county. Each team appointed shall serve for a period of four years; provided that the chairperson shall have the flexibility of appointing additional special teams for shorter or longer periods of time as the need arises. Members of a biosecurity response team shall receive continuing professional education and training on the provision of assistance to be ready to provide services whenever a biosecurity event emergency occurs. The team members shall ~~be compensated~~ receive reimbursement for actual expenses incurred for each day of service provided under this section, including participation in training required by the chairperson, ~~under a fee schedule established by the chairperson under chapter 91.~~

(c) The team shall be activated by the chairperson whenever the chairperson finds that assistance is appropriate following a biosecurity event or an emergency related to biosecurity is declared by the Governor under chapter 127A.”

2. At the bottom of page 39, add a new section to read as follows:

**“§150A-\_\_ Rapid response quarantine authority.** The Chairperson is authorized to quarantine any area that is known or reasonably suspected to be infested with a newly detected invasive species or pest, a new population of an invasive species or pest, an invasive species or pest that is being actively controlled in the State, or a prohibited or restricted organism to prevent the movement of materials to or from the location.”

### **Part V Transitional Facilities**

Part V of SB 1100 provides for the inspection of plants, animals, and certain agricultural commodities imported into Hawaii from other states to be carried out by private sector employees licensed by HDOAB at privately owned transitional facilities. It is exciting that this bill is looking at models used in New Zealand to prevent the importation of pests. However, we note a few issues presented by the proposed amendments in Part V.

For instance, the proposed amendments, unlike the New Zealand model, do not allow for the inspection of any item imported or require the movement of all containers to transitional facilities, do not clarify how the fees for the private inspections will be established or clarify how the fees will meet the reasonableness test so as not to burden or impede interstate commerce, and require licensing be done by HDOAB. In Hawaii, professional licensing is

generally done by the Department of Commerce and Consumer Affairs, which would be appropriate here.

In addition, implementing the transitional facilities proposed by Part V will be a big undertaking. In New Zealand, the licensing, facility, pre-border, border, and health and biosecurity requirements are hundreds and hundreds of pages. It seems reasonable to develop and provide import standards for the various imports and to understand the potential impacts that this program might have, including on food. Further, New Zealand is an independent country and its national government sets out its importation and inspection standards. As a state, Hawaii is subject to preemption by Federal laws and limited in its ability to regulate foreign or interstate commerce by the U.S. Constitution. We hope the transitional facilities program will be carried out in a manner that will protect Hawaii from legal challenges for impermissibly burdening commerce and consumers from increased costs, perhaps by beginning this effort with a study conducted by the Legislative Reference Bureau.

**Ensuring fairness in expenditures for Government-Industry Agreements for Readiness and Response and Pest Management Plans.**

Part VI of SB 1100, in section 31 (beginning on pg. 70, line 1) adds two new sections to chapter 150A, HRS. The first section allows HDOAB to enter into agreements with businesses and industry groups related to preventing, detecting, and responding to “unwanted organisms.” There are no penalties if the businesses fail to comply with the plan. It appears these are fully voluntary agreements for industries and HDOAB will provide resources to develop and carry out the agreements.

**We respectfully suggest the Committees consider requiring businesses to comply with the terms of the agreement by inserting on page 71, between lines 4 and 5, the following:**

“(c) A violation of an applicable readiness plan shall be subject to penalties as set out in section 150A-14.”

The second new section (page 71, line 5) allows any person to request HDOAB fund management activities for new and possibly existing pests under a pest management plan. The new section requires the Board of Agriculture and Biosecurity to approve the plans and HDOAB will share costs and may enter into contracts to carry out the plans. These seem to be control or eradication plans, not regulatory plans and there is no penalty for failure to comply with a plan. The use of the term “person” also appears to exclude any State or local government entity.

**We respectfully request the Committees consider inserting “including any unit of State or local government” after “Any person” on page 71, line 5.**

HDOA's list of pests for control and eradication was last updated 2008. Section 141-3.5(a) HRS currently requires HDOA to "develop and implement a detailed control or eradication program for any pest designated ... using the best available technology." To date, HDOA has not developed any such plans, and there is nothing prohibiting HDOAB from working with industry, conservation, or any other groups in developing those required plans. We hope this new section will streamline HDOAB's petition process to designate new pests and develop control or eradication plans for high-impact pests. However, to the extent HDOAB is funding pest control actions for private entities on private property without requiring the entities to comply with the plans, we do not think HDOAB needs a new statute for that.

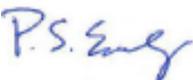
Further, as drafted, the pest management plan approval process creates a first come/first served grant program for using State funds to control pests. We suggest that HDOAB either consider all plans at one time each year, with an exception for rapid response for new pests, or HDOAB itself identify the priority pests and locations where expenditure of State funds will be most effective to prevent, control, or eradicate a pest and ask for plan submissions related to HDOAB's own priorities.

Mahalo for the opportunity to provide testimony on SB 1100.

Aloha,



Christy Martin  
CGAPS Program Manager



Stephanie Easley  
CGAPS Legal Fellow



P.O. Box 253, Kunia, Hawai'i 96759  
Phone: (808) 848-2074; Fax: (808) 848-1921  
e-mail [info@hfbf.org](mailto:info@hfbf.org); [www.hfbf.org](http://www.hfbf.org)

February 6, 2025

HEARING BEFORE THE  
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT  
SENATE COMMITTEE ON TRANSPORTATION AND CULTURE AND THE ARTS  
SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION

**TESTIMONY ON SB 1100**  
RELATING TO BIOSECURITY

Conference Room 229 & Videoconference  
9:30 AM

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice-Chairs Richards, Inouye, and Fukunaga, and Members of the Committees:

I am Brian Miyamoto, Executive Director of the Hawai'i Farm Bureau (HFB). Organized since 1948, the HFB is comprised of 1,800 farm family members statewide and serves as Hawai'i's voice of agriculture to protect, advocate, and advance the social, economic, and educational interests of our diverse agricultural community.

**The Hawai'i Farm Bureau supports SB 1100**, which renames the Department of Agriculture as the Department of Agriculture and Biosecurity, establishes a Deputy Chairperson for Biosecurity, and enhances the state's biosecurity capabilities through strengthened policies, enforcement mechanisms, and funding.

Invasive species are among the greatest threats to Hawai'i's environment, agriculture, and economy. Each year, new pests such as the coffee berry borer, little fire ant, coconut rhinoceros beetle, two-lined spittlebug, rose-ringed parakeet, varroa mite, and rapid 'ōhi'a death threaten local food production, native ecosystems, and public health. Once established, these pests are costly and difficult to control. A strong biosecurity program is essential to prevent new invasive species from entering the state and manage those already here.

SB 1100 takes a comprehensive approach to strengthening biosecurity by:

- Renaming the Department of Agriculture as the Department of Agriculture and Biosecurity
- Establishing a Deputy Chairperson for Biosecurity to provide focused leadership and coordination of biosecurity efforts within the department.

- Requiring the Department of Agriculture and Biosecurity to establish an emergency response team to act quickly in the event of a biosecurity threat.
- Allowing the department to establish transitional facilities and private inspectors to improve the inspection of imported plants and animals.
- Increasing penalties for illegally transporting plants, animals, and microorganisms to deter harmful introductions.
- Requiring interisland inspections of certain transported goods to prevent the spread of pests between islands.
- Transferring the Hawai'i Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity to better align invasive species management with agricultural biosecurity efforts.

Providing the necessary authority, funding, and personnel to enhance biosecurity measures will improve the state's ability to prevent, detect, and respond to invasive species before they cause irreversible damage. Hawai'i's farmers and ranchers depend on a healthy agricultural environment to sustain their operations, and effective biosecurity is critical to protecting local food production, safeguarding natural resources, and reducing the economic costs of invasive species management.

We urge the committee to pass SB 1100 to strengthen Hawai'i's biosecurity efforts and better protect the state from invasive threats.

Thank you for the opportunity to testify on this measure.



# SIERRA CLUB OF HAWAI'I

**SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT  
SENATE COMMITTEE ON TRANSPORTATION AND CULTURE AND THE ARTS  
SENATE COMMITTEE ON COMMERCE AND CONSUMER PROTECTION**

February 6, 2025

9:30 AM

Conference Room 229

**COMMENTS on SB1100: RELATING TO BIOSECURITY**

---

Aloha Chair Gabbard, Chair Lee, Chair Keohokālole, Vice Chair Richards, Vice Chair Inouye, Vice Chair Fukunaga, and Members of the Committees,

On behalf of our over 20,000 members and supporters, the Sierra Club of Hawai'i **offers COMMENTS AND CONCERNS** regarding SB1100, which renames the Department of Agriculture as the Department of Agriculture and Biosecurity (DAB) and makes various amendments and investments in its roles within our biosecurity framework. **The Sierra Club greatly appreciates the recognized need to ensure the Department of Agriculture takes its biosecurity responsibilities seriously, but is gravely concerned about the potentially devastating unintended consequences of placing the Hawai'i Invasive Species Council (HISC) and other non-Department of Agriculture programs and entities under the DAB.**

For years, if not decades, Department of Agriculture leaders have failed to utilize the department's unique and critical authorities to address the introduction and spread of invasive species across Hawai'i nei. This lack of regulatory initiative has contributed to multiple waves of invasive species that have already irrevocably and fundamentally impacted our islands. Invasive plants and wildlife have overtaken entire watersheds, not just impacting native ecosystems but also reducing aquifer recharge, increasing our vulnerability to floods and wildfires, and smothering our nearshore reefs and waters with runoff. Parasites and other pests have affected local food production and increased the use of toxic pesticides on farms and in home gardens, risking both public health as well as threatening stream and nearshore species critical to our aquatic ecosystems. Most recently, the years-long delay of regulatory action by the department has led to the establishment of the little fire ant and two-lined spittlebug on Hawai'i Island, the establishment of the coconut rhinoceros beetle on O'ahu, and the ongoing spread of the same across Kaua'i.

The Sierra Club appreciates that this measure would emphasize the need for department leaders to finally embrace their regulatory role, by renaming the department as the



# SIERRA CLUB OF HAWAI'I

Department of Agriculture and Biosecurity, and establishing a deputy director to be responsible for its biosecurity efforts, among other initiatives.

**However, given the Department of Agriculture's longstanding inability and/or unwillingness to fulfill its own existing duties in our all-hands-on-deck fight against invasive pests, the Sierra Club does have serious concerns with two aspects of this bill.**

**First, placing HISC and other existing non-Department of Agriculture biosecurity programs under the newly renamed DAB may have devastating consequences for our islands.** HISC and its ISCs have proven to be incredibly effective at holding the line against invasive species, despite extremely limited funding and a lack of support from other agencies (i.e. the Department of Agriculture) assigned their own unique roles in our biosecurity framework. They are able to combine specialized expertise, field knowledge, cross-agency coordination, and community relationships to support the all-hands-on-deck fight to monitor, manage, and eradicate myriad invasive species throughout the islands, in areas ranging from forests to open spaces to even businesses and homes. **Notably, they have been able to successfully prevent or eradicate dozens of outbreaks of invasive species on every island, from fireweed to pampas grass to little fire ants, saving us from untold millions of dollars in damages and protecting our environment, food security, cultural integrity, local businesses, and residents from the significant and potentially irreparable impacts of invasive pests.** Nonetheless, the Department of Agriculture was unwilling or unable to collaborate with HISC and other proven effective programs in the use of the historic biosecurity funding it was provided last year, the majority of which remains unencumbered. Given these and other longstanding concerns with Department of Agriculture leadership, placing HISC and other non-Department of Agriculture biosecurity programs under the DAB could severely disrupt and even dismantle what few effective strategies we currently have – leaving our islands incredibly vulnerable to the potentially devastating impacts of invasive species. **We therefore respectfully but strongly urge the Committees to remove any provisions that would place authority over HISC, the ISCs, and other non-Department of Agriculture biosecurity programs under the DAB.**

Second, given the concerns raised regarding the historical and recent actions and inactions of the Department of Agriculture's leadership, we respectfully urge that there be much stronger accountability mechanisms for any deputy director of biosecurity. The lack of even a Senate confirmation process means that the status quo of department inaction may continue with no consequences under an appointed deputy director of biosecurity,



even with the authorities and investments provided in this measure. **We therefore specifically urge amendments to ensure that the deputy director of biosecurity be subject to the Senate confirmation process, and to additionally report on a quarterly basis to the Board of Agriculture and on an annual basis to the legislature regarding their progress, challenges, and recommendations for the DAB biosecurity program.**

The Sierra Club greatly appreciates the effort put into this potentially transformative measure by its authors. **However, given our widely shared concerns regarding potential major and irreversible unintended consequences, we ask that the Committees adopt the amendments described above, or HOLD this bill.**

Mahalo nui for the opportunity to testify.

LARRY JEFTS FARMS, LLC  
PO BOX 27  
KUNIA, HAWAII 96759  
(808) 688-2892

SB1100, Relating to Biosecurity  
Senate AEN/TCA/CPN Hearing – 9:30 AM  
Thursday, February 6, 2025

Testimony By: Larry Jeffs  
Position: Support

Chairs Gabbard, Lee, and Keohokalole and Vice Chairs Richards, Inouye and Fukunaga, and Members of the Senate AEN/TCA/CPN Committees:

I am Larry Jeffs, owner and operator of Larry Jeffs Farms, LLC. We have more than 42 years of Hawaii farm experience on Molokai and Oahu. Our family farms grow about 1 million pounds weekly of import replacement produce. I am a volunteer director, serving as Chair of the West Oahu Soil and Water Conservation District (SWCD). I have also served as an officer of the Hawaii Farm Bureau for many years.

We appreciate this comprehensive measure to strengthen Hawaii's capacity to control and eradicate harmful invasive species infestations and prevent the entry of other harmful invasive species.

Recent discussions about biosecurity have increased the awareness of the severe damage to agriculture as well as the quality of life of our communities.

Thank you for the opportunity to testify on this bill.

**SB-1100**

Submitted on: 2/4/2025 6:00:05 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
John & Rita Shockley	Testifying for Free Access Coalition	Support	Written Testimony Only

Comments:

Aloha!

The Free Access Coalition supports SB1100 that will strengthen the fight against invasive species of plants, animals, and insects that can ruin our aina. We hope the Legislators will take this threat seriously and help transform the Dept. of Agriculture into a key tool to stop invasive species.

Mahalo for your time.



**Hawaii Cattlemen's Council, Inc.**

**COMMITTEE ON AGRICULTURE AND ENVIRONMENT**

Senator Mike Gabbard, Chair

Senator Herbert M. "Tim" Richards, III, Vice Chair

**COMMITTEE ON TRANSPORTATION AND CULTURE AND THE ARTS**

Senator Chris Lee, Chair

Senator Lorraine R. Inouye, Vice Chair

**COMMITTEE ON COMMERCE AND CONSUMER PROTECTION**

Senator Jarrett Keohokalole, Chair

Senator Carol Fukunaga, Vice Chair

**SB1100**

**RELATING TO BIOSECURITY**

Thursday, February 6, 2025, 9:30 AM  
Conference Room 415 & Videoconference

Chairs Gabbard, Lee & Keohokalole, Vice Chairs Richards, Inouye & Fukunaga, and Members of the Committees,

The Hawaii Cattlemen's Council **supports SB1100** which Renames the Department of Agriculture as the Department of Agriculture and Biosecurity and establishes requirements that strengthen biosecurity for the state.

Biosecurity should be a high priority for Hawaii as a remote, island state. This bill demonstrates biosecurity as a high priority and designates the Department of Agriculture to take the lead in managing biosecurity for the state. Biosecurity measures are vital for protecting Hawaii's landscape and agricultural operations.

We appreciate the opportunity to testify on this measure. The Hawaii Cattlemen's Council (HCC) is the Statewide umbrella organization comprised of the four county-level Cattlemen's Associations. Our member ranchers represent over 60,000 head of beef cows; more than 75% of all the beef cows in the State. Ranchers are the stewards of over 750 thousand acres of land in Hawaii, or 20% of the State's total land mass. We represent the interests of Hawaii's cattle producers.

Nicole Galase  
Hawaii Cattlemen's Council  
Managing Director



**SB-1100**

Submitted on: 2/3/2025 3:26:46 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Nancy Redfeather	Testifying for Ka Ohana O Na Pua	Support	Written Testimony Only

Comments:

This may be the most important piece of invasive species legislation ever written in Hawai'i. Giving HDOA the Authority to act, and placing responsibility and staff in a dedicated office with a clear objective is what has been needed for a very long time. Strong Support for every aspect of this bill.



# MAUI

CHAMBER OF COMMERCE

VOICE OF BUSINESS

**HEARING BEFORE THE SENATE COMMITTEES ON AGRICULTURE AND ENVIRONMENT and  
COMMITTEE ON TRANSPORTATION AND CULTURE AND THE ARTS and  
COMMITTEE ON COMMERCE AND CONSUMER PROTECTION  
HAWAII STATE CAPITOL, SENATE CONFERENCE ROOM 229  
Thursday, February 6, 2025, 9:30 A.M.**

Senator Mike Gabbard, Chair  
Senator Herbert M. "Tim" Richards, III, Vice Chair  
Members of the committee on Agriculture and Environment  
Senator Chris Lee, Chair  
Senator Lorraine R. Inouye, Vice Chair  
Members of the committee on Transportation and Culture and The Arts  
Senator Jarrett Keohokalole, Chair  
Senator Carol Fukunaga, Vice Chair  
Members of the committee on Commerce and Consumer Protection

## **SUPPORT SB1100 RELATING TO BIOSECURITY**

The Maui Chamber of Commerce **SUPPORTS SB1100**, which, among other things, renames the Department of Agriculture as the Department of Agriculture and Biosecurity; establishes a Deputy Chairperson for Biosecurity; requires the Department of Agriculture and Biosecurity to establish an emergency response team to respond to biosecurity events; authorizes the department to establish transitional facilities and private inspectors to inspect imported plants and animals; requires inspection of various items transported interisland; increases penalties for illegally transporting plants, animals, and microorganisms; requires the department to establish government-industry agreements to detect and respond to unwanted organisms in Hawaii; and authorizes pest management plans to address, contain, or eradicate pests.

The Chamber supports the strengthening of penalties for illegal plant and animal imports and the authorization for the creation of private transitional facilities to inspect imported plants and animals.

Additionally, the measure increases funding for biosecurity enforcement and facilitates cost-sharing agreements with the private sector to enhance biosecurity infrastructure.

Biosecurity is critically important for our island state, and we must strengthen the protection of our fragile ecosystem.

For these reasons, we **SUPPORT SB1100** and respectfully request its passage.

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.



February 4, 2025

To: Chair Gabbard, Chair Lee, Chair Keohokalole, and the Senate Committees on AEN, TCA, and CPN

Subject: **SB1100**, Relating to Biosecurity

Aloha,

**Please pass SB1100.** This bill moves forward with protecting the State of Hawai'i's biosecurity. Given the current times, the need for regulation has never been more apparent. The bill focuses on increasing the Department of Agriculture and Biosecurity's power to protect the island by granting them additional regulatory functions.

**Voting "yes" on SB1100** would lead to the proper labeling of different food grades, dealing of pests, removal/quarantine of infected animals and plants, grant inspection powers, and establish an emergency biosecurity response program. Additionally, a portion of this bill alleviates the demand placed on the Department of Land and Natural Resources to carry out invasive species control. Beyond oversight for invasive species, the concern of disease spread to Hawaii from imports impacts the security of our food network. Focusing on improving food security for the Hawaiian Islands is a priority, and passing this bill shows your dedication to your constituents, neighbors, and friends.

Mahalo,  
Jeanette Burdick & the Food+ Policy Team  
#fixourfoodsystem

---

**The Food+ Policy internship** develops student advocates who learn work skills while increasing civic engagement to become emerging leaders. We focus on good food systems policy because we see the importance and potential of the food system in combating climate change and increasing the health, equity, and resiliency of Hawai'i communities.

In 2025, the cohort of interns are undergraduate and graduate students and young professionals working in the food system. They are a mix of traditional and nontraditional students, including parents and veterans, who have backgrounds in education, farming, public health, nutrition, and Hawaiian culture.



The Wildlife Society  
*Hawai'i Chapter*

PO Box 22192  
Honolulu, Hawai'i 96823-2192

Aloha Chairs Gabbard, Lee, and Keohokalole and Vice Chairs Richards, Inouye, and Fukunaga

The Wildlife Society (TWS), Hawai'i Chapter is composed of wildlife professionals within the State of Hawai'i. TWS Hawai'i Chapter is dedicated to the conservation and preservation of flora and fauna native to the Hawaiian Islands.

**TWS Hawai'i Chapter submits this testimony with comments for SB 1100.** TWS supports the bill's intent to improve biosecurity in Hawaii. Biosecurity is the first and most important line of defense to prevent an invasive species from entering and becoming established in a given area. Establishing a variety of means to quarantine, inspect, and send back or destroy invasive threats coming into the State is important especially with natural ecosystems that are as special and already under threat as those in Hawaii. TWS appreciates the elevation of biosecurity in importance as the renaming of the current Hawaii Department of Agriculture (HDOA) to the Department of Agriculture and Biosecurity (DAB) would suggest. We are supportive of biosecurity becoming of co-lead importance in the mandate of the department. We are also encouraged that a new deputy for biosecurity would be created to work on those efforts. We are concerned, however, that the current HDOA may have challenges carrying out its new added mandates. The legislature allocated a significant funding for biosecurity in the last year and it appears much of it has yet to be spent. Should biosecurity become more important in the new DAB, the TWS urges more biosecurity be implemented in a timely manner.

In addition, this bill if passed, would move the Hawaii Invasive Species Council (HISC) from where it is currently housed in Department of Land and Natural Resources (DLNR) to the DAB. **TWS is opposed to moving HISC into DAB.** Although DLNR and HDOA have been co-leads in the HISC since its inception, there are compelling reasons to continue HISC being housed at DLNR. HISC is created as an interagency body and as such has maintained managing shared invasive species priorities in conservation, agriculture, transportation, health, and research. Should it become a part of DAB, we are concerned that the areas of conservation, transportation, health, and research may become secondary to agriculture interests. In addition, while it was housed at DLNR there were some years the legislature saw fit not to allocate general funds to the HISC. The DLNR then granted parts of its own funds to keep the HISC going. We are

concerned that the DAB may not have the kinds of resources to keep the HISC functioning in such situations.

As an alternative to moving HISC into DAB, and given that the HISC is an interagency council, it might be better able to serve the State if the **HISC were housed within the Governor's office or as a body outside any of the departments it coordinates**. This would, however, require that the HISC have reliable stable funding for its staff and the projects it would continue to support addressing invasive threats throughout the State.

**Mahalo for the opportunity to testify with the above comments regarding SB 1100.** Should you have any further questions please contact our Conservation Affairs Chair, Patrick Chee at [twshicac@gmail.com](mailto:twshicac@gmail.com) .



The Wildlife Society  
*Hawai'i Chapter*

PO Box 22192  
Honolulu, Hawai'i 96823-2192

Aloha Chairs Gabbard, Lee, and Keohokalole and Vice Chairs Richards, Inouye, and Fukunaga

The Wildlife Society (TWS), Hawai'i Chapter is composed of wildlife professionals within the State of Hawai'i. TWS Hawai'i Chapter is dedicated to the conservation and preservation of flora and fauna native to the Hawaiian Islands.

**TWS Hawai'i Chapter submits this testimony with comments for SB 1100.** TWS supports the bill's intent to improve biosecurity in Hawaii. Biosecurity is the first and most important line of defense to prevent an invasive species from entering and becoming established in a given area. Establishing a variety of means to quarantine, inspect, and send back or destroy invasive threats coming into the State is important especially with natural ecosystems that are as special and already under threat as those in Hawaii. TWS appreciates the elevation of biosecurity in importance as the renaming of the current Hawaii Department of Agriculture (HDOA) to the Department of Agriculture and Biosecurity (DAB) would suggest. We are supportive of biosecurity becoming of co-lead importance in the mandate of the department. We are also encouraged that a new deputy for biosecurity would be created to work on those efforts. We are concerned, however, that the current HDOA may have challenges carrying out its new added mandates. The legislature allocated a significant funding for biosecurity in the last year and it appears much of it has yet to be spent. Should biosecurity become more important in the new DAB, the TWS urges more biosecurity be implemented in a timely manner.

In addition, this bill if passed, would move the Hawaii Invasive Species Council (HISC) from where it is currently housed in Department of Land and Natural Resources (DLNR) to the DAB. **TWS is opposed to moving HISC into DAB.** Although DLNR and HDOA have been co-leads in the HISC since its inception, there are compelling reasons to continue HISC being housed at DLNR. HISC is created as an interagency body and as such has maintained managing shared invasive species priorities in conservation, agriculture, transportation, health, and research. Should it become a part of DAB, we are concerned that the areas of conservation, transportation, health, and research may become secondary to agriculture interests. In addition, while it was housed at DLNR there were some years the legislature saw fit not to allocate general funds to the HISC. The DLNR then granted parts of its own funds to keep the HISC going. We are

concerned that the DAB may not have the kinds of resources to keep the HISC functioning in such situations.

As an alternative to moving HISC into DAB, and given that the HISC is an interagency council, it might be better able to serve the State if the **HISC were housed within the Governor's office or as a body outside any of the departments it coordinates**. This would, however, require that the HISC have reliable stable funding for its staff and the projects it would continue to support addressing invasive threats throughout the State.

**Mahalo for the opportunity to testify with the above comments regarding SB 1100.** Should you have any further questions please contact our Conservation Affairs Chair, Patrick Chee at [twshicac@gmail.com](mailto:twshicac@gmail.com) .

**SB-1100**

Submitted on: 2/5/2025 6:52:08 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kupuna for the Mo'opuna	Testifying for Kupuna for the Moopuna	Comments	Written Testimony Only

Comments:

Kupuna for the Moopuna offer the following **COMMENTS on SB1100.**

We appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity – but we **STRONGLY OPPOSE** placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

Further, we urge you to **CONSIDER AMMENDMENTS** that will better ensure the department and deputy are held accountable to their responsibilities going forward:

1. regular reporting requirements to the Board of Agriculture and the public
2. deadlines for invasive species action plans with clear benchmarks for actions and outcomes
3. initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalo.



The Senate  
Committee on Agriculture and Environment  
Committee on Transportation and Culture and the Arts  
Committee on Commerce and Consumer Protection  
Thursday, February 6, 2025  
9:30 AM Conference Room 229  
State Capitol  
415 South Beretania Street

**SUBJECT: Testimony – Providing Comments on SB1100 “Relating to Biosecurity”**

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs, and Members of the Committees,

I am writing on behalf of the O‘ahu Invasive Species Committee (OISC) to express appreciation for the legislature recognizing the urgent need to bolster statewide biosecurity and invasive species management. Improving prevention and response efforts for invasive species will be critical to the success of on-going and future responses to high-priority pests that pose significant threats to our State. However, OISC is concerned with the portion of this bill that proposes moving the Hawai‘i Invasive Species Council (HISC) from being administered through the Department of Land & Natural Resources (DLNR) to administration through the Department of Agriculture (DOA).

The proposed shift of HISC from DLNR to DOA concerns OISC for the following reasons:

1. The responsibilities associated with biosecurity and invasive species management are too far-reaching to consolidate into a single department.
2. HISC provides multi-agency collaboration that allows OISC to work in areas other departments cannot, expanding the abilities of those departments to address invasive species.
3. The coordination from HISC and DLNR has limited the negative impacts from high-priority invasive pests that otherwise would’ve been more severe.

**1. The responsibilities associated with biosecurity and invasive species management are too far-reaching to consolidate into a single department.**

Preventing invasive species from entering our state, managing high-priority invasive pests that have established or are establishing, and conducting islandwide surveillance are all critically important to successful biosecurity efforts. Each of these are also massive undertakings that require substantial amounts of capacity and effort. Consolidating all of the work it takes to facilitate these actions would spread any department too thin to be successful at any one of these management stages.

Given the importance of DOA’s role in prevention, and the quick increase in additional resources and responsibilities attached to Act 231 from last year, moving HISC to DOA now would likely jeopardize the State’s ability to manage invasive species to the degree needed. Allowing DOA to focus on their increased responsibilities, by maintaining the current position of HISC under DLNR, would allow for a more detailed assessment into which improvements would best suit statewide biosecurity. It would also

provide the increased stakeholder engagement necessary in understanding roles and responsibilities for each agency. Making improvements that emulate successful large-scale systems like what New Zealand has implemented is a great idea. However, even New Zealand spreads these responsibilities across multiple departments and collaborative partnerships, rather than consolidating efforts into a single entity. Although we need to ensure steady progress toward biosecurity improvements, it will be equally important to ensure we are making appropriate changes that set statewide biosecurity efforts up for success.

## **2. HISC provides multi-agency collaboration that allows OISC to work in areas other departments cannot, expanding the abilities of departments to address invasive species.**

OISC fills an important role in biosecurity efforts by addressing problematic invasive species before they become an issue for other departments. HISC coordination, funding, and the ability of HISC to leverage federal resources make this important work possible. For example, OISC is the only O‘ahu entity that actively manages the watershed-destroying species known as miconia (*Miconia calvescens*). Miconia exacerbates erosion, stormwater runoff, flooding, and excess sedimentation into streams. These characteristics also harm our nearshore marine habitats. If this species were to fully establish in our forests it would become a target pest that DLNR would need to address and prioritize.

Establishment of miconia would then cost the state substantially more annually in mitigating these negative impacts. OISC serves as a second layer of protection in responding to pests that reach peoples’ backyards, like miconia and others, before they threaten conservation lands and native forest ecosystems (e.g. State Forest Reserves, Natural Area Reserves). These efforts provide relief to the DLNR and to private landowners while protecting vast tracts of forest from some of the world’s worst invasive species.

HISC funds also allow OISC to bolster early-detection efforts at the ports for species that no other agency is tasked with managing. For example, OISC regularly checks detection traps at the Foreign Trade Zone for species not yet on O‘ahu. These species include the spotted lanternfly (*Lycorma delicatula*) and spongy moth (*Lymantria dispar*) among several other high-priority pests. OISC also checks traps at Honolulu Harbor and Daniel K. Inouye International Airport for Africanized honey bee swarms (*Apis mellifera scutellata*), which would devastate the Hawai‘i bee industry upon introduction. HISC funds again make this work possible, and without them, these areas would go unchecked. HISC helps OISC acquire all licenses and approvals required to access these sensitive, high-security areas. Detecting these dangerous pests at a critical point where large amounts of commodities enter the State fills an important gap in statewide biosecurity.

While invasive species can spread across land-ownership boundaries easily, certain departments are limited to only work in areas they are allowed to access. For example, certain DLNR programs work only in State Forest Reserves or Natural Area Reserves. County agencies are often limited to county lands. Even some of our federal partners are only permitted to work on military lands or adjacent parcels. OISC fills a vital role in islandwide biosecurity by working across all land-ownerships. Outreach staff work hard to gain approvals to access many private parcels across the island. Each year OISC records a 95-100% access permission success rate.

OISC field staff are also trained for rigorous wildland settings that staff from some other departments are not. This includes expertise in off-trail hiking, backcountry species identification, and technical skills

such as rappelling and helicopter management. While also working in urban/suburban areas, this versatility emphasizes OISC's ability to address invasive species across the entirety of the island. HISC funding and coordination make all of this important work possible, and if the HISC is moved to DOA, those funds are likely to be directed away from these critical projects.

### **3. The coordination from HISC and DLNR has limited the negative impacts from high-priority invasive pests that otherwise would've been more severe.**

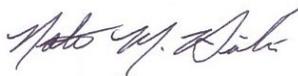
O'ahu has benefited substantially from HISC's ability to coordinate between stakeholders and departments regarding biosecurity. In 2021, after DOA declared that they would no longer dedicate any more resources toward little fire ant (*Wasmannia auropunctata*) or coqui frog (*Eleutherodactylus coqui*) on O'ahu, HISC recognized the need to fill that gap. HISC leveraged limited state resources to secure federal funds, thereby increasing capacity for agencies willing to take on the increased workload for those species.

DLNR and HISC have helped OISC acquire \$4,989,943 from additional federal funding sources since 2021. These funds have expanded OISC management efforts to fill gaps in response for high-priority pests. Both HISC and DLNR coordinated with federal agencies including the U.S. Department of Defense, the U.S. Forest Service, the U.S. Environmental Protection Agency, and the National Fish & Wildlife Foundation to fill this need. By contrast, no other departments have provided close to the same level of support as HISC and DLNR. OISC does not receive state passthrough funding from any other departments and was not made eligible to apply for any of the Act 231 Biosecurity funds through DOA.

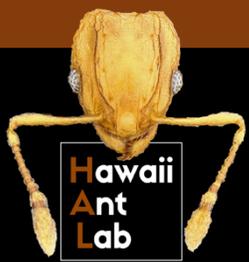
Coordination from HISC and DLNR extends beyond acquiring additional funds to combat the on-going threats of invasive species. For example, when OISC was not permitted to be added to the DOA Right of Entry (ROE) for the parcel belonging to the Department of Hawaiian Homelands (DHHL), HISC stepped in and worked with DLNR and DHHL leadership to establish a new ROE allowing OISC to access these areas and begin control operations for the coqui frog infestation. These efforts are in addition to HISC leading/participating in a number of working groups, facilitating the MOU between DLNR/UH/DOA, and establishing strategic development for statewide biosecurity like the 2024 Priority Pest Workshop. HISC has also helped coordinate field operations for coqui frog and little fire ant and participated in the on-the-ground efforts to help increase fieldwork capacity.

On behalf of OISC, I would like to again express my gratitude to the legislature and these committees in recognizing the urgent need to increase and improve biosecurity across the state. Addressing the growing threats posed by invasive species will be crucial in protecting our industries, resources, and way of life. I greatly appreciate the opportunity to provide testimony for your consideration regarding these important matters. Please do not hesitate to reach out should you have any questions.

Sincerely,



Nate Dube  
OISC Manager  
[oiscmgr@hawaii.edu](mailto:oiscmgr@hawaii.edu)



## Hawaii State Senate

Committees on Agriculture and the Environment, Commerce and Consumer Protection, and Transportation and Culture and the Arts.

FEBRUARY 6, 2025

9:30a

Hawaii State Capitol Conference Room 229

### SUBJECT: Testimony – Comments on SB1100

Dear Chairs, Vice Chairs, and Members the AEN, CPN, and TCA

The Hawaii Ant Lab (HAL) is grateful for the opportunity to submit this testimony and provide comments on SB1100 *“Relating to Biosecurity”*. At this point, HAL is unable to support SB1100, as it is written and without significant revision, due to the inclusion of some actions that would have lasting, negative, repercussions on invasive species control in Hawaii.

Specific points on agreement:

- Further expansion (beyond current authorities granted in the HRS, and CH 4-72 revisions of the HAR) of departmental authorities at the pre-border, rapid response post border for new species introductions, and enforcement of regulatory authority aimed at preventing inter- and intra-state spread of invasive species, pests, and diseases.
  - o HDOA should be the lead on pre-boarder, and rapid response post boarder for new invasive species, pest, and disease introductions. The HRS and HAR already grants HDOA authorities and regulatory power to achieve these objectives and the recently adopted Chapter 4-72 rule changes has broadened the scope of these authorities.
- Inspection requirement for interisland transport of specific articles mentioned.
  - o The only concern is that the list is limiting and does not fully close the gap. Invasive species are known to “hitchhike” on non-plant and soil items such as fencing and building materials, vehicles and machinery, household items, etc... Without inspection **We suggest inclusion of language such as “... and any other item originating from an area with known establishment of a priority pest or**

*quarantine pest or disease or when a priority pest or quarantine pest or disease is reasonably suspected to be present.”*

- Enhancement of existing quarantine and cargo inspection through the building of transitional facilities and contracting trained and qualified inspectors from private industry biosecurity firms.
  - o Building of transitional facilities and public-private partnerships will likely increase the biosecurity capacity of the state and set a foundation for comprehensive biosecurity industry in Hawai`i.

Points of concern:

- Part III Section 19 creates a Deputy Chairperson of Biosecurity within HDOAB, a non-civil service position appointed by the Governor and without Senate confirmation.
  - o As described in SB1100, this position would hold significant power over all invasive species work in HI. Any position holding such extensive power should require Senate confirmation as part of governmental check and balances and to ensure the appointee is properly qualified for the position.
- Pg 22 Part III Section 19: “... the deputy chairperson for biosecurity shall oversee all of the State’s biosecurity initiatives, including programs under chapters 142, 150A, and 194 and sections 141-5, 261-4.5, and 266-21.5.” This section assigns oversight of the Hawaii Invasive Species Council (HRS Ch 194) to the Deputy Chairperson of Biosecurity and shift departmental attachment of the HISC from DLNR to HDOAB
  - o Currently the HISC is administratively attached to DLNR with voting members from DLNR, HDOA, DOH, DOT, DBEDT, and UH leadership. Although departmental administration is provided by DLNR, the HISC functions as an autonomous council where no single agency holds disproportional sway on the disbursement of funds.
- Pg 73 Part VII Section 32 provides extensive details on the movement of HISC from DLNR to HDOAB
  - o HAL was originally created as a collaboration between HDOA and UH in 2008. Until 2021, HAL received approximately half of our funding from HDOA. However, HAL has received no funding support from the HDOA since 2021 which has led to partial furlough of HAL staff on two occasions and lasting for six months each. During these times, HAL depended more heavily on HISC funding and DLNR supported HAL with essential gap-filling supplemental funds to end the partial furlough.
  - o In 2024, ACT 231 awarded HDOA \$1.5M for statewide little fire ant control which island ISC’s and HAL were excluded from applying for and additional proposals submitted by HAL have yet to be reviewed or funded by HDOA. This demonstrates an unwillingness or inability by HDOA to effectively coordinate interagency priority pest response efforts.
  - o As a partner organization, HAL testifies that the HISC has gone above and beyond with supporting invasive species related projects (terrestrial and aquatic), seeking federal and state funding opportunities for invasive species projects, and coordinating collaborative control efforts between State and Federal agencies, UH projects, and other partner organizations.

- In 2024, the HISC led the creation of the Interagency MOU on Priority Pests. Partners from Island ISC's, HAL, and other UH projects and from DLNR and HDOA were tasked developing island and state-wide response plans for CRB, LFA, and Coqui Frog. HDOA has had limited involvement with the drafting of these response plans and their actions toward residential control of LFA without coordination with partner agencies are in contrast to the roles and responsibilities agreed upon under the Interagency MOU. This also demonstrates unwillingness or inability by HDOA to effectively coordinate interagency priority pest response efforts.

At this time, HAL is unable to support SB1100 due to language under Parts III and VII relating to the appointment of the Deputy Chairperson for Biosecurity and shifting the HISC to HDOAB from DLNR given HDOA's lack of coordination and transparency with partner agencies and organization. Without clear and demonstrated effective interagency coordination efforts by HDOA, HAL is concerned that such a move will have dire consequences for future funding through the HISC and for our project's future. We suggest all language relating to such a move be omitted from SB1100.

Regards,  
Dr. Michelle Montgomery PhD  
Manager – Hawaii Ant Lab



Hawai'i State Legislature  
415 South Beretania St  
Honolulu, HI 96813  
Attn: AEN, TCA, CPN Committee Chairs and Members

February 4, 2025

RE: Testimony for SB1100

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

Aloha, my name is Jonnetta "Jonee" Peters, executive Director for Conservation Council for Hawai'i with roughly 4000 members, and the Hawai'i affiliate of the National Wildlife Federation. I am writing today to offer the following COMMENTS on SB1100 and, **I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.**

I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity. Currently, the Department of Agriculture has been lacking in protecting our islands from the damaging influx of invasive species, and creating the need to battle the widespread contamination.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever-present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalo nui for your time and consideration.

Jonnetta "Jonee" Peters  
Executive Director

Telephone/Fax: 224.338-6511 | email: [info@conservehi.org](mailto:info@conservehi.org)  
web: [www.conservehawaii.org](http://www.conservehawaii.org) | P.O. Box 2923, Honolulu, HI 96802

President: Colleen Heyer | Vice President: Bret Mossman | Secretary: Makaala Kaaumoana | Treasurer: Mashuri Waite Ph.D  
| Directors: Puanani Anderson-Fung, Stephen Lee Montgomery Ph.D, Emily Sarassa, Les Welsh, Sunshine Woodford  
Executive Director: Jonnetta "Jonee" Peters | Operations and Events Manager: Leah Kocher

National Wildlife Federation Region 12 Director: Rachel Sprague

National Wildlife Federation Pacific Region Associate Director: Emily Martin

*Kō Hawai'i leo no nā holoholona lōhiu – Hawai'i's voice for wildlife | State Affiliate of the National Wildlife Federation*

**SB-1100**

Submitted on: 2/5/2025 10:16:17 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Derek Ford	Testifying for Island UAV, LLC	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Derek Ford, representing my local environmental business Island UAV, LLC, and I am writing today regarding SB1100. Its is painfully clear to anyone like myself who has worked in local conservation that the Hawaii Department of Agriculture is not equipped to take on any additional responsibility for invasive species management. This bill does not have Hawaii's best interest in mind.

I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.**

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Derek Ford

**SB-1100**

Submitted on: 2/4/2025 4:01:28 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Carol Kwan	Testifying for Carol Kwan Consulting LLC	Oppose	Written Testimony Only

Comments:

I strongly oppose this bill because HDOA has proven to be woefully incompetent in doing what's necessary to protect Hawaii from invasive species. While the lower level workers are capable, dedicated, qualified individuals, HDOA's leadership has refused to listen to its lower ranks. Coconut Rhinoceros Beetle could have been eradicated if HDOA leaders had been willing to make the hard decisions necessary to enact a quarantine back in 2013-2014. Instead, we're dealing with millions of dollars in losses in the landscaping industry and on private properties.

Putting Biosecurity under HDOA would put Hawaii Invasive Species Council (HISC) under HDOA. That would be disasterous. HISC and the ISCs on each island have been working with their hands tied in combatting invasive species in large part because HDOA/BOA have not enacted administrative rules with teeth, but at least HISC has been working.

I am a Certified Arborist with my own consulting business. I have been in business for 22 years. Mahalo for considering my testimony.

Carol Kwan



**HAWAII GOVERNMENT EMPLOYEES ASSOCIATION**  
AFSCME Local 152, AFL-CIO

**RANDY PERREIRA**, Executive Director • Tel: 808.543.0011 • Fax: 808.528.0922

The Thirty-Third Legislature, State of Hawaii  
The Senate  
Committee on Agriculture and Environment  
Committee on Transportation and Culture and The Arts  
Committee on Commerce and Consumer Protection

Testimony by  
Hawaii Government Employees Association

February 6, 2025

S.B.1100 – Relating to Biosecurity

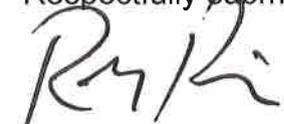
The Hawaii Government Employees Association, AFSCME Local 152, AFL-CIO opposes in part, the purpose and intent of S.B.1100, which authorizes the department to establish private inspectors to inspect imported plants and animals.

The Department of Agriculture currently has civil service positions that appears to perform the duties and responsibilities that is being proposed for private inspectors. Instead of appropriating moneys to privatize the functions of these employees, the legislature should instead provide the funding for the department to recruit and retain civil servants.

This measure goes to the larger issue which is that the civil service system must become more flexible, competitive, and adaptive to the current job market and public demands. The state needs to invest in its current and future workforce – increasing the position pay and offering modern and attractive recruitment and retention incentives. Establishing opportunities for private inspectors to perform the same and/or similar functions is contrary to the principals of civil service. We fear that the proposed privatizing language will eventually lead to job loss and/or job displacement for our members that work within the Department of Agriculture.

Thank you for the opportunity to submit testimony in opposition of S.B 1100.

Respectfully submitted,



Randy Perreira  
Executive Director

**SB-1100**

Submitted on: 2/4/2025 9:27:31 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Doug Harper	Testifying for Malama Maunalua	Oppose	Written Testimony Only

Comments:

Aloha,

I am writing in opposition to the proposed bill. As an organization working on environmental protection and restoration, invasive species are one of the greatest challenges confronting the state. Everything from community disaster resilience, to food security are impacted by invasives, and unfortunately the problem is only getting more serious as we deal with existing species while confronting new ones.

I appreciate the concern and interest the Legislature has shown on the issue. The problem is I feel the proposed solution will actually make the problem worse. Moving the offices for response to Ag fundamentally changes the focus of the mission, the lines of communications, and breaks down the infrastructure and progress critical groups like OISC and HISC have made. It addresses a problem by making the situation worse, not better.

Most organizations in the state that address invasive species are conservation organizations. Groups like mine work hand in glove with the HISCs and DLNR. DLNR has the scientists to understand the issue, and to understand environmental eradication and containment. Ag, despite doing incredible work, does not.

Set-ups like the one being proposed are common in other countries, like New Zealand, but the existing infrastructure in Hawai'i is not the same and the proposed solution will not be the same. To use a sports analogy, it's like taking the idea for a play from rugby and assuming it will work in the NFL. Different sport, different lineups, different rules, and it will likely result in an undesirable outcome.

For these reasons I am strongly opposed to the passage of SB1100. Like I said, I am heartened to see the interest from the Senate and Legislature, I just think a new discussion needs to be had with all the players on the subject to come up with a better solution, because what is proposed is not that.

Mahalo,

Doug Harper

Executive Director, Malama Maunalua



**SB-1100**

Submitted on: 2/5/2025 9:29:51 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Joseph Wat	Individual	Oppose	In Person

Comments:

Aloha nui kākou,

The growing legislative focus on Biosecurity is amazing, I appreciate it deeply as I've gotten Little Fire Ants in the past 6 months at both my current residence on the windwardside and my family house in town.

While I support the majority of the bill, I have some questions and qualms I would like to raise. Hopefully they can be resolved in future drafts so I can fully support:

First, the Deputy Chair of Biosecurity - this position should go through the same selection process as other department Deputy Chair positions including legislative confirmation.

Second (and a much longer list of questions) is regarding the position of HISC in the state government and its proposed shift to HDOA.

- Right now the Biosecurity infrastructure of the state is deeply entangled with DLNR. Needed improvements to these programs could mostly be resolved through effective funding. Moving departments seems like an unnecessary administrative burden in the midst of a significant ongoing projects like CRB and LFA.
- Biosecurity is inherently a multi-agency task. DOT can manage ports, HDOA can manage inspections... but DLNR is an appropriate location for invasive species once something has escaped our line of defenses (like CRB and LFA have done so far). **Would it be more appropriate to designate a Biosecurity Deputy in DOT, DLNR, and HDOA while leaving the current administrative structure in place?** I'm not sure what the previous barrier to effective collaboration has been, the legislature should look into this.

Third, the bill mentions "any person" can propose a bio-security plan that will be reviewed by the board. This would be a SIGNIFICANT administrative burden for the board and I worry about their capacity to review these applications with nuance.

I strongly support several other aspects of this bill (electronic ag declarations, transitional facilities, etc). However, until these questions are addressed and there is an accountability structure for HDOA's implementation of this HUGE kuleana (either legislative oversight or legislatively mandated) to ensure that this shift will not interrupt services delivered to my community, I cannot support it.

Already, the biosecurity bill from last legislative session has caused a significant interruption. HDOA is wasting time duplicating data that I collected with a huge amount of time spent organized volunteers and by demanding a slice of very limited HAL and OISC time resources. Seeing this lack of communications between agencies is part of my concern over mandating HDOA such an increase in Biosecurity kuleana.

I have many additional thoughts and will follow the development of this bill closely.

Aloha nō,

- Joe

**SB-1100**

Submitted on: 2/4/2025 7:51:01 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Brandon Najarian	Individual	Oppose	Remotely Via Zoom

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Brandon Najarian, and I am a concerned O‘ahu resident writing comments about SB1100, relating to biosecurity. I am in the field of conservation, and have dedicated my graduate and professional career to invasive species management and control. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.

The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management. On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, maintaining communication, transparency, and coordinating with other invasive species and biosecurity organizations. The Department of Agriculture also ignores the collective, informed opinions of professionals and specialists, often opting to support private businesses in lieu of conservation organizations, committees, and affected community groups.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,  
Brandon Najarian

**SB-1100**

Submitted on: 2/3/2025 10:08:35 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Daniel Rubinoff	Individual	Oppose	Written Testimony Only

Comments:

I am strongly against moving the Invasive species committees from DLNR to HDOA. HDOA is already overburdened with their current responsibilities and are severely understaffed this is not the time to give HDOA more responsibility; they don't have the staff to handle their current challenges. They have also experienced high staff turnover. DLNR is a natural place and best for the Invasive Species committees and allows them to work on both urban and wildland/watershed pests. These are not areas where HDOA has more experience. Merging them with HDOA will force HDOA to start handling not only agricultural pests but also invasive species across the many environments of Hawaii. This will reduce the invasive species committee's effectiveness AND HDOAs. Please do not go forward with this poorly-conceived idea.

**SB-1100**

Submitted on: 2/4/2025 9:16:15 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Danielle Frohlich	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the need for robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns about implementation, accountability, and resource allocation.

Transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity, as proposed by SB 1100, is problematic for several reasons. Staff currently working under organizations like the ISCs or the Department of Land and Natural Resources (DLNR) bring specialized knowledge and field experience. Assimilating them into the HDOA risks diluting their effectiveness by embedding them in a bureaucratic structure that prioritizes agricultural productivity over ecosystem health. Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into the HDOA risks limiting their ability to operate independently and nimbly, potentially slowing response times and reducing the impact of their work. Additionally, the HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

The HDOA has a poor track record in effectively managing invasive species and enforcing existing regulations. Despite receiving generous funding for biosecurity programs in the past, the HDOA has struggled to allocate these resources efficiently to priority areas. Funds are often underutilized or directed away from pressing invasive species issues. Additionally, the HDOA has failed to crack down on businesses responsible for transporting invasive species, such as the Little Fire Ant (LFA), interisland. Infested plants continue to be sold to unsuspecting customers, contributing to the spread of these harmful pests. Furthermore, the department has consistently faced challenges in hiring and retaining skilled biosecurity professionals. Adding responsibilities without addressing staffing inefficiencies will exacerbate these issues and reduce program effectiveness.

Moreover, both the Hawaii Invasive Species Council (HISC) and the Coordinating Group on Alien Pest Species (CGAPS) have attempted to work with the HDOA but have found the department to be unhelpful and uncommunicative with coordination and information sharing. Incorporating the HISC into the HDOA will not improve this issue. The HDOA's history of poor communication and uncooperative behavior with HISC and CGAPS indicates that merging these entities will not resolve the fundamental issues of coordination and information sharing.

Rather than giving additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management. The Hawai'i Ant Lab and the Island Invasive Species Committees (ISCs), for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

While biosecurity is a critical issue for Hawai'i, the approach of SB 1100 is flawed. The HDOA's history of mismanagement and inefficiency, combined with its poor record in collaborating with HISC and CGAPS, make this measure an unsuitable solution. I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species. By investing in proven entities like the Hawai'i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

Mahalo for the opportunity to testify.

**SB-1100**

Submitted on: 2/3/2025 8:42:33 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kyhl A Austin	Individual	Oppose	Written Testimony Only

Comments:

I am writing to express my opposition to transferring the ISCs from DLNR to HDOA.

The Department of Agriculture has shown time and time again that they are incapable of handling even the most basic of biosecurity tasks. Giving them even more responsibilities is a recipe for disaster at a time when biosecurity in Hawaii needs to be completely revamped. The ISCs do an outstanding job with the limited resources they are provided. Transferring them to the HDOA will make the situation with coqui frogs, little fire ants, and coconut rhinoceros beetles so much worse.

Though I agree with the sentiments behind the bill, transferring the ISCs to HDOA is absolutely NOT the right thing to do. Biosecurity is an enormously important thing for the state of Hawaii and I hope you treat it with the seriousness it deserves.

Mahalo for your time,

Kyhl Austin

**SB-1100**

Submitted on: 2/4/2025 9:20:24 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sarah Halpern	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) to the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the need for robust biosecurity measures to protect Hawai'i's ecosystems and agriculture, this measure raises significant concerns about implementation, accountability, and resource allocation.

Rather than giving additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management, such as the Island Invasive Species Committees (ISCs). These entities already have systems in place which have proven effective. If the ISCs are moved, it could jeopardize the future of our ecosystems.

I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species.

Mahalo for the opportunity to testify.

Sarah Halpern

**SB-1100**

Submitted on: 2/3/2025 9:30:33 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Kevin Faccenda	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair and Members of the Committee, as a botanist actively working with and researching invasive plants in Hawai'i, I am in strong support of increased regulation to strengthen Hawai'i's biosecurity. Invasive species such as LFA, Miconia, CRB, etc are an existential threat to our islands, both agriculturally and ecologically. However, this bill, as currently drafted, makes changes I cannot support. **I support this bill with amendments.**

Principally, I am concerned by section 36 & 37 which moves the Hawai'i invasive species council (HISC) the control of the department of agriculture and biosecurity (DOAB). While I understand the appeal of concentrating biosecurity operations to one department, I am quite skeptical of the ability of the DOAB to manage invasive species at a landscape scale. For example, last legislative session HDOA was allocated \$10M to manage little fire ant and coconut rhinoceros beetles. As of the writing of this, they have not yet spent a single penny and as such the situation with these pests is deteriorating.

The current administration of HDOA, and thus the future administration of DOAB do not seem to possess the skills or ability to manage invasive species at a large scale. This is contrary to HISC which has shown itself to be very effective at managing and eradicating invasive species. Relationships between HISC and HDOA administration are hardly amicable. Going back to the \$10M for invasive species control mentioned previously, despite promises to the contrary, applications for these funds were not made available to HISC but instead went to private companies despite HISC being the most capable organization to do the work. I do not believe that requiring HISC to report to the DOAB would be a positive to biosecurity in Hawai'i. **I strongly suggest ammendments removing section 36, 37, or any other language which would give DOAB any control over HISC.** If, in the future, DOAB has shown competency in management of invasive species at a landscape scale, and engaged in productive collaboration with HISC, I would support relocating HISC.

I support that this bill has the chairperson of biosecurity appointed by the governor and the remainder of the bill, minus the points raised above.

Thank you for the opportunity to voice my opinion on this bill.

Kevin Faccenda, PhD

Honolulu, HI

**SB-1100**

Submitted on: 2/4/2025 9:31:10 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Tamara Luthy	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns regarding implementation, accountability, and resource allocation.

Transferring the Invasive Species Council (ISC) and other biosecurity staff to the newly restructured department is problematic. The specialized knowledge and field experience of staff currently working under organizations like the ISCs or the Department of Land and Natural Resources (DLNR) risk being diluted within the HDOA's bureaucratic structure, which prioritizes agricultural productivity over ecosystem health. The collaborative, cross-agency approach of the ISCs has been crucial in responding swiftly to invasive species threats, and integrating these efforts into the HDOA could hinder their effectiveness and response times.

The HDOA has historically struggled with managing invasive species and enforcing regulations. Despite receiving significant funding for biosecurity programs, the HDOA has often misallocated resources and failed to address priority areas effectively. Additionally, the department has not adequately addressed the transportation of invasive species, such as the Little Fire Ant (LFA), and has faced challenges in hiring and retaining skilled biosecurity professionals. Adding more responsibilities without resolving these inefficiencies will further reduce program effectiveness.

Furthermore, both the Hawaii Invasive Species Council (HISC) and the Coordinating Group on Alien Pest Species (CGAPS) have found the HDOA unhelpful and uncommunicative in coordination and information sharing. Merging these entities with the HDOA will not resolve these fundamental issues.

Rather than allocating additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management, such as the Hawai‘i Ant Lab and the Island Invasive Species Committees (ISCs). These entities have made significant progress in invasive species detection, management, and eradication, despite operating with fewer resources.

While biosecurity is critical for Hawai'i, SB 1100's approach is flawed. The HDOA's history of mismanagement and poor collaboration makes this measure unsuitable. I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species.

Mahalo for the opportunity to testify.

**SB-1100**

Submitted on: 2/4/2025 10:35:20 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Hela	Individual	Oppose	Written Testimony Only

Comments:

I oppose SB 1100, which proposes renaming the Department of Agriculture (HDOA) and restructuring its responsibilities. While I support strong biosecurity measures, this bill raises concerns about implementation, accountability, and resource allocation.

Transferring the Invasive Species Council and other biosecurity staff to the restructured HDOA is problematic. These staff members have specialized knowledge and field experience that could be diluted within the HDOA's bureaucratic structure, which prioritizes agriculture over ecosystem health. The HDOA has a poor track record in managing invasive species and enforcing regulations, often misallocating resources and failing to address pressing issues like the spread of the Little Fire Ant.

Additionally, the HDOA has been unhelpful and uncommunicative with the Hawaii Invasive Species Council (HISC) and the Coordinating Group on Alien Pest Species (CGAPS). Merging these entities will not resolve coordination and information-sharing issues.

Instead of giving more resources to the HDOA, funds should be directed to organizations with proven success in invasive species management, such as the Hawai'i Ant Lab and the Island Invasive Species Committees (ISCs). These entities are more effective and results-driven.

I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species.

**SB-1100**

Submitted on: 2/4/2025 4:13:14 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Evan Yazawa	Individual	Oppose	Written Testimony Only

Comments:

**Dear Chair and Members of the Committee,**

I am writing to express my opposition to SB1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the critical need for robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns about the effectiveness of implementation, accountability, and resource allocation.

**1. Ineffectiveness and Mismanagement by the HDOA** The HDOA has a poor track record when it comes to effectively managing invasive species and enforcing existing regulations. For example:

- **Failure to allocate resources efficiently:** Despite receiving funding for biosecurity programs in the past, the HDOA has struggled to adequately allocate these resources to priority areas. Funds are often underutilized or directed away from pressing invasive species issues.
- **Lack of enforcement:** The HDOA has failed to crack down on businesses responsible for transporting invasive species, such as the Little Fire Ant (LFA), interisland. Infested plants are still sold to unsuspecting customers, contributing to the spread of these harmful pests.
- **Difficulty in hiring and retaining qualified staff:** The department has consistently faced challenges in hiring and retaining skilled biosecurity professionals. Adding responsibilities without addressing staffing inefficiencies will exacerbate these issues and reduce program effectiveness.

Rather than giving additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management. The Hawai‘i Ant Lab and the Invasive Species Committees, for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

**2. Concerns About Assimilation of Staff** SB1100 proposes transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity. This move is problematic for several reasons:

- **Loss of specialized expertise:** Staff currently working under organizations like the Invasive Species Committees (ISCs) or the Department of Land and Natural Resources (DLNR) bring specialized knowledge and field experience. Assimilating them into the HDOA risks diluting their effectiveness by embedding them in a bureaucratic structure that prioritizes agricultural productivity over ecosystem health.
- **Reduced autonomy and collaboration:** Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into the HDOA risks limiting their ability to operate independently and nimbly, potentially slowing response times and reducing the impact of their work.
- **Shift in priorities:** The HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

**3. Potential for Duplication and Inefficiency** The creation of new roles, such as a Deputy Chairperson for Biosecurity, and additional programs may lead to unnecessary duplication of efforts rather than building on existing frameworks. For example, the Hawai‘i Ant Lab and ISCs already manage detection and rapid response for many invasive species. Adding another layer of administration could create inefficiencies and confusion over roles and responsibilities.

**4. Better Use of Funds** The proposed appropriation of funds under SB1100 would be better spent bolstering existing programs and partnerships with proven track records. For example:

- Increasing funding for the Hawai‘i Ant Lab would allow them to expand their efforts to control LFAs and other harmful pests.
- Supporting the ISCs would enhance community-based invasive species management programs, which are more flexible and responsive than centralized bureaucratic approaches.
- Improving interagency collaboration and streamlining existing efforts would ensure resources are used effectively and efficiently.

**Conclusion** While biosecurity is a critical issue for Hawai‘i, SB1100’s approach is flawed. The HDOA’s history of mismanagement and inefficiency, combined with the risks of assimilating effective programs into a centralized bureaucracy, make this measure an unsuitable solution. I urge the committee to reconsider SB1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai‘i from invasive species. By investing in proven entities like the Hawai‘i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

Thank you for the opportunity to testify.

**SB-1100**

Submitted on: 2/4/2025 3:24:50 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kevin Armstrong	Individual	Oppose	Written Testimony Only

Comments:

This bill concerns me as the transfer of ISC management to HDOA from DLNR could severely hamstring the ISCs' ability to operate. HDOA has been underfunded and short-staffed for years, leading to their inability to adequately respond to invasive pest issues when called upon. HDOA also has little experience in invasive species management and that work should fall to specialists. Failure to respond to invasive species issues will negatively impacts many facets of life on the islands such as causing new issues for the agricultural industry (new pests of concern) and residents now having to be worried about stinging ant species (LFA). Appointing a chairperson also leaves much too much room for conflict of interest with industry and the appointing of a person without an invasive species management background into a crucial role that has the ability to permeate into many aspects of the lives of locals. The ISCs should remain independent of HDOA.

**SB-1100**

Submitted on: 2/4/2025 3:18:35 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Mina H Elison	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Mina Elison and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Mina Elison

**SB-1100**

Submitted on: 2/4/2025 3:42:16 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
KEALA FUNG	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Keala Fung and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Keala Fung

**SB-1100**

Submitted on: 2/4/2025 4:03:01 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Patricia Blair	Individual	Oppose	Written Testimony Only

Comments:

Oppose placing HISC and other bio security entities under the Dept. of Agriculture . That would be a set back.

**SB-1100**

Submitted on: 2/4/2025 5:52:31 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Josh Atwood	Individual	Oppose	Written Testimony Only

Comments:

I am writing in opposition to this measure, specifically the section that would transfer the HISC to the Department of Agriculture. The HISC in its current administrative home has a proven history of maintaining a broad view of invasive species impacts across natural resources, human health, transportation, economic, and agricultural impacts, as well as a successful record of disbursing funds to critical interagency projects like the island-based Invasive Species Committees and Hawai'i Ant Lab.

**SB-1100**

Submitted on: 2/5/2025 10:58:53 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Angela Huntemer	Individual	Oppose	Written Testimony Only

Comments:

Dear Committee Chair and Members,

Hawai'i Invasive Species Council (HISC) and the community-powered invasive species committees (ISCs) must not fall under the thumb of the narrowly-focused Department of Agriculture.

SB1100 seeks to get the Department of Agriculture to step up and uphold its long-neglected biosecurity role - not a terrible idea - but also includes provisions to place HISC, the ISCs, and other programs supported by HISC under the Department and a proposed "deputy of biosecurity." **This could be devastating to efforts to protect our natural and cultural resources and practices, food security, public health, local economy, and quality of life from the devastating impacts of invasive pests.** HISC and ISCs employ some of the only proven effective strategies we have to understand and respond to invasive species outbreaks, using interdepartmental coordination, specialized expertise, field knowledge, emerging research, and the power of community in their efforts.

**Placing them under the nortoriously inefficient Department of Agriculture and its problematic leadership could drain or deprive them of funds and the ability to do their work - leaving our islands and communities vulnerable to devastating impacts from uncontrolled pest and weed infestations.**

**SB1100 has some merits but I absolutely OPPOSE provisions that would give the Department of Agriculture control over HISC and other critical biosecurity programs.**

**Mahalo for the opportunity to testify.**

**Angela Huntemer**

**SB-1100**

Submitted on: 2/4/2025 8:59:12 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Paul McDonald	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

I am a concerned O'ahu resident writing comments about **SB1100**, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time-sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Mahalo for the opportunity to provide testimony on SB1100.

**SB-1100**

Submitted on: 2/4/2025 8:37:45 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Molly Mamaril	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Molly Mamaril from Kaimukī, O‘ahu and am writing to oppose and provide comments for SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (DAB) (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management. The Hawai‘i Invasive Species Committee (HISC) and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.
- The Department of Agriculture, though well-intentioned, has had difficulty filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, and coordinating with other invasive species and biosecurity organizations. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Thank you for the opportunity to provide testimony on SB1100.

Molly Mamaril

**SB-1100**

Submitted on: 2/5/2025 9:25:57 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Julie Kuo	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

Thank you for the opportunity to provide comment on **SB1100**, relating to biosecurity. My name is Julie Kuo and I am a resident of O‘ahu with concerns regarding the section on “§141- Deputy chairperson of biosecurity; established.”

I am particularly concerned that the Hawaii Invasive Species Council (HISC) will be moved from the Department of Land and Natural Resources (DLNR) to the Department of Agriculture [and Biosecurity] (DOAB), where the integrity of these pillars may be crippled or lost, further limiting Hawaii’s ability to manage aquatic and terrestrial invasive species.

HISC provides essential funds for interagency projects and program operations aimed at preventing new invasive species introductions and their dispersal intra- and inter-island, prioritizing both aquatic and terrestrial biosecurity (ref. [HISC FY 24](#)). These funds also fill State and Federal resource gaps that control established invasive species populations from expanding and threatening native species diversity and ecosystem services utilized by local industries (i.e.: tourism, fishery, aquaculture, etc.).

Shifting HISC’s functions under the DOAB’s authority will likely disrupt ongoing projects and programmatic functions, impacting years of progress with managing Little Fire Ant, Coqui Frogs, and Albizia, and other efforts, while DOAB re-prioritizes the distribution of biosecurity funds to fit DOAB’s initiatives.

Though DOA is accomplished in managing aspects of biosecurity on land (i.e.: agriculture, aquaculture, land plant industry, border control in airports/harbors), the agency is limited in their experience and understanding of personnel/funding requirements in other fields such as for managing ballast water, vessel biofouling, and marine debris pathways of invasive species introductions, since it falls under the purview of DLNR, Division of Aquatic Resources (DAR).

DAR relies heavily on HISC grant funds to support these programs; however, if SB1100 is passed unamended, and HISC’s responsibilities are transferred to DOAB, the agency could remove funding to these critical programs and others alike that don’t align with DOA’s top priorities/initiatives. These programs would lose their ability to effectively prevent new invasive

species introductions, implement rapid response efforts, and manage Hawaii biosecurity risks, leaving larger gaps to fill in the future.

Thank you for your time and consideration in amending SB1100 to retain HISC's authority under DLNR.

Mahalo,

Julie Kuo

**SB-1100**

Submitted on: 2/4/2025 6:00:08 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Barbara Best	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,  
Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalo,

Barbara Best, Wailuku

**SB-1100**

Submitted on: 2/4/2025 8:15:22 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Samantha Nelson	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Samantha Nelson and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Samantha Nelson

**SB-1100**

Submitted on: 2/4/2025 8:21:37 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Pila	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Pila Young and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.**

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Mahalo,

Pila Young

**SB-1100**

Submitted on: 2/5/2025 9:39:16 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jeanna Morse	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Jeanna Morse, and I am a concerned O‘ahu resident writing comments about SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Jeanna Morse

**SB-1100**

Submitted on: 2/4/2025 9:23:37 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Arielle LaBrecque	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the need for robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns about implementation, accountability, and resource allocation.

Transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity, as proposed by SB 1100, is problematic for several reasons. Staff currently working under organizations like the ISCs or the Department of Land and Natural Resources (DLNR) bring specialized knowledge and field experience. Assimilating them into the HDOA risks diluting their effectiveness by embedding them in a bureaucratic structure that prioritizes agricultural productivity over ecosystem health. Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into the HDOA risks limiting their ability to operate independently and nimbly, potentially slowing response times and reducing the impact of their work. Additionally, the HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

The HDOA has a poor track record in effectively managing invasive species and enforcing existing regulations. Despite receiving generous funding for biosecurity programs in the past, the HDOA has struggled to allocate these resources efficiently to priority areas. Funds are often underutilized or directed away from pressing invasive species issues. Additionally, the HDOA has failed to crack down on businesses responsible for transporting invasive species, such as the Little Fire Ant (LFA), interisland. Infested plants continue to be sold to unsuspecting customers, contributing to the spread of these harmful pests. Furthermore, the department has consistently faced challenges in hiring and retaining skilled biosecurity professionals. Adding responsibilities without addressing staffing inefficiencies will exacerbate these issues and reduce program effectiveness.

Moreover, both the Hawai‘i Invasive Species Council (HISC) and the Coordinating Group on Alien Pest Species (CGAPS) have attempted to work with the HDOA but have found the department to be unhelpful and uncommunicative with coordination and information sharing.

Incorporating the HISC into the HDOA will not improve this issue. The HDOA's history of poor communication and uncooperative behavior with HISC and CGAPS indicates that merging these entities will not resolve the fundamental issues of coordination and information sharing.

Rather than giving additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management. The Hawai'i Ant Lab and the Island Invasive Species Committees (ISCs), for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

While biosecurity is a critical issue for Hawai'i, the approach of SB 1100 is flawed. The HDOA's history of mismanagement and inefficiency, combined with its poor record in collaborating with HISC and CGAPS, make this measure an unsuitable solution. I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species. By investing in proven entities like the Hawai'i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

Thank you for the opportunity to testify.

**SB-1100**

Submitted on: 2/4/2025 8:42:49 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Keith Short	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Keith Short and I am a concerned O‘ahu resident writing comments about SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Keith Short

**SB-1100**

Submitted on: 2/4/2025 7:47:22 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lori Luers	Individual	Oppose	Written Testimony Only

Comments:

The intention to consolidate HISC into DOA is a misguided attempt. HISC has attempted to get DOA involvement for projects, and unfortunately have had little engagement from DOA. This consolidation would result in the underfunding of essential projects that protect native species and put what makes Hawai'i unique culturally and biogeographically at risk. HISC has been able to address invasive species projects faster at the smaller scale under DLNR such as with coqui frog and little fire any response. This consolidation would slow down the response and would backfire to cause acceleration of invasive species in Hawai'i. This bill does not mimic DOC in New Zealand which has specialized committees as well, and I myself have volunteered with their endangered species team in Tongariro. This bill puts all the Hawaiian islands invasive species committees at risk, and I strongly oppose this as a Hawai'i resident. Hawai'i is one of the last places that hosts the majority of plant, bird and other diversity. We have already suffered consequence for massive kāhuli extinctions and need not look much farther to see the consequences of not addressing invasive species such as in Guam where not one coconut tree survives and where the brown snake thrives. Please do not pass this bill so the invasive species teams continue their work against priority alien species such as CRB, LFA, and more.

**SB-1100**

Submitted on: 2/4/2025 8:00:30 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Keith Neal	Individual	Oppose	Written Testimony Only

Comments:

Aloha,

Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

Oppose to SB1100

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

Like illegal drugs and fireworks, invasive species must be interdicted at Hawai!'s ports of entry. Once the contraband has left the ports it is near impossible to manage.

Keith Neal

Waimea

**SB-1100**

Submitted on: 2/4/2025 7:47:22 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lori Luers	Individual	Oppose	Written Testimony Only

Comments:

The intention to consolidate HISC into DOA is a misguided attempt. HISC has attempted to get DOA involvement for projects, and unfortunately have had little engagement from DOA. This consolidation would result in the underfunding of essential projects that protect native species and put what makes Hawai'i unique culturally and biogeographically at risk. HISC has been able to address invasive species projects faster at the smaller scale under DLNR such as with coqui frog and little fire any response. This consolidation would slow down the response and would backfire to cause acceleration of invasive species in Hawai'i. This bill does not mimic DOC in New Zealand which has specialized committees as well, and I myself have volunteered with their endangered species team in Tongariro. This bill puts all the Hawaiian islands invasive species committees at risk, and I strongly oppose this as a Hawai'i resident. Hawai'i is one of the last places that hosts the majority of plant, bird and other diversity. We have already suffered consequence for massive kāhuli extinctions and need not look much farther to see the consequences of not addressing invasive species such as in Guam where not one coconut tree survives and where the brown snake thrives. Please do not pass this bill so the invasive species teams continue their work against priority alien species such as CRB, LFA, and more.

**SB-1100**

Submitted on: 2/4/2025 9:32:21 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Edward Esperante	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālolo, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Edward Esperante and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Edward Esperante

**SB-1100**

Submitted on: 2/4/2025 10:21:14 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Rebecca	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Rebecca Weible, and I am a concerned O‘ahu resident writing comments about SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Rebecca Weible

**SB-1100**

Submitted on: 2/4/2025 9:12:43 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kiana Otsuka	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Kiana Otsuka, and I am a concerned O‘ahu resident writing in opposition to SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Kiana Otsuka

**SB-1100**

Submitted on: 2/4/2025 10:04:57 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
JR Miles	Individual	Oppose	Written Testimony Only

Comments:

**\*\*Re: SB1100\*\***

While I fully support the spirit of this bill and strongly believe there is a critical need for improved biosecurity regulation, enforcement, and response, I do not believe that the HDOA is the best choice to implement these changes at this time.

Neither the DLNR nor the HDOA has a strong track record of proper management or effective implementation in several areas currently under their jurisdiction.

During my time in the horticultural industry, I found HDOA’s assistance invaluable. However, their management of agricultural parks and grant program implementation has been abysmal. Similarly, lands under DLNR and HDOA management have become reservoirs for invasive plant species; often to the detriment of neighboring properties, highway and roadway divisions, and the broader community.

HDOA does not appear to have a strong history of advocacy for biosecurity, and its recent policy shifts seem to reflect a response to public pressure rather than proactive initiatives.

I strongly urge legislators to consider empowering organizations already engaged in invasive species mitigation by providing them with the tools and authority to respond swiftly and effectively to emerging threats. While HDOA may be well positioned to formulate and implement biosecurity regulations, they are neither currently equipped nor sufficiently proactive to respond to threats in a timely and effective manner.

To be clear, I have had the privilege of interacting with several researchers, academics, and inspectors affiliated with HDOA, and I have found their character, dedication, and commitment to be impeccable; especially concerning biosecurity and threats to Hawaii’s ecology, agriculture sector, and food security.

I ask that legislators fully fund current biosecurity efforts while further investigating the feasibility of HDOA assuming responsibility for control, mitigation, and eradication efforts.

**SB-1100**

Submitted on: 2/4/2025 10:48:17 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Glenn Beachy	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Glenn Beachy (also for my wife Martha Reppun Beachy), and we are concerned O‘ahu residents writing comments about SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Glenn & Martha Beachy

**SB-1100**

Submitted on: 2/4/2025 8:31:22 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Melody Euaparadorn	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

I am writing to express my opposition to SB1100 due to several concerns that threaten the effectiveness of conservation efforts and invasive species management in Hawai‘i. These issues include:

- Moving HISC from the DLNR to the newly proposed Department of Agriculture and Biosecurity (DOAB) could severely disrupt multi-agency coordination and funding efforts for high-priority invasive species like Little Fire Ants and Coqui Frogs.
- Centralizing all invasive species management under DOAB risks prioritizing agricultural concerns over broader ecosystem health.
- Department of Agriculture has had problems filling critical positions, spending funds quickly for time-sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

The success of Hawai‘i’s invasive species management depends on a well-coordinated, well-resourced, and multi-agency approach. This bill undermines these efforts and could hinder ongoing progress. I urge the Committee to reject or amend this bill.

Thank you for your time and consideration.

Sincerely,

Melody Euaparadorn

**SB-1100**

Submitted on: 2/5/2025 4:47:59 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Ryan Chang	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Ryan Chang and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.**

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Ryan Chang

**SB-1100**

Submitted on: 2/4/2025 8:43:33 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Giancarlo Baffaro	Individual	Oppose	Written Testimony Only

Comments:

Aloha Kākou,

My name is Giancarlo Baffaro and as a concerned citizen who is passionate about mālama ‘āina and the people of Hawai’i, I vehemently OPPOSE this bill.

- It simply is not needed, DLNR has been very capable in the support of the HISC mission and its partners.

- HDOA leadership has already proven their incompetence and lack of commitment in managing invasive species in Hawai’i; therefore, adding more responsibility to their department is the exact opposite of what needs to happen in order to even have a chance of success in the HISC mission in the "invasive species capital of the world."

Mahalo!

**SB-1100**

Submitted on: 2/4/2025 10:09:44 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Dylan Davis	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

This is Dylan Davis, an Oahu conservationist with roughly 10 years of experience in the field, writing to oppose SB1100 for its proposal to delegate the Hawaii Invasive Species Council (HISC) to an advisory role within the Department of Agriculture and Biosecurity (DAB). My reasons for this are as follows:

1. Such a move will likely cause significant damage to existing invasive species control efforts and programs. As it exists currently, the HISC oversees county-level Invasive Species Councils (ISCs), which employ staff on the ground to perform early detection, rapid response, mitigation, and eradication efforts across the state. These programs are effective in their operations and have been an integral aspect to Hawaii's efforts towards invasive species control for decades. The ISCs respond not just to ports of entry, residential neighborhoods, or sites of biological material transport, storage, or sale, but also to remote natural landscapes far beyond the Department of Agriculture's real of experience. These ISCs have also not been funded by the Department of Agriculture, though have successfully raised and utilised millions in federal funding for years.

I believe that SB1100 as written would effectively terminate these existing county-based councils, with no protection for their safe transfer into the DAB, Department of Health, of Department of Land and Natural Resources, as suggested by Part VII, section 32.7, as the only form of semi-direct management the HISC would ultimately have as an advisory entity if this bill were to pass. While equitable resources may eventually be reassigned to other Departments to continue this work, it will surely mean a lapse in management efforts in the field that would effectively result in decades of progress being wiped out, due to the nature of invasive species ecology.

2. I believe that the Department of Agriculture's track record for invasive species response and management is wildly insufficient to be given such added responsibility. Decades of poor communication and cooperation with state, federal, and NGO invasive species management agencies has been indicative of an unwillingness by the department to adequately engage in such

activities. Their recent handling of the Act 231 biosecurity bill has been indicative of an inability to adequately engage in such activities, either due to lack of knowledge, leadership, or functional capability.

I sincerely hope you take these points into consideration, as I believe SB1100 as written would have tremendous impacts on Hawaii's ability to effectively combat invasive species.

Mahalo,

Dylan Davis

**SB-1100**

Submitted on: 2/5/2025 6:19:09 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Nancy Harter	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālolo, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Nancy Harter and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Nancy Harter, Lahaina

**SB-1100**

Submitted on: 2/5/2025 12:40:11 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Nicholas Yos	Individual	Oppose	Written Testimony Only

Comments:

As a concerned citizen, I oppose SB 1100 because I believe this bill will actively harm both the local community and our priceless ecosystems. By forcing independent conservation nonprofits to operate under the thumb of HDOA, this bill would add needless bureaucracy to the already uphill battle of stopping invasive species. HDOA has proven time and time again that they are not reliably committed to the cause of stopping invasive species - most recently in the disastrous example of the coconut rhinoceros beetle - and trusting them to oversee even more of the state's invasive species efforts would undoubtedly lead to even more failures. I have seen the damage invasive species can cause in both the forest and my own neighborhood and I believe that SB 1100 will only make this crisis worse.

**SB-1100**

Submitted on: 2/4/2025 9:18:17 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Patrice Choy	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

**SB-1100**

Submitted on: 2/4/2025 10:10:52 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sheala Karratti-Humphries	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill. The addition and consolidation of responsibilities under the Department of Agriculture could lead to oversight issues and a lack of focus on specialized operations may render the Department inefficient and unable to perform its duties.

**SB-1100**

Submitted on: 2/4/2025 9:40:03 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
tia pearson	Individual	Oppose	Written Testimony Only

Comments:

Despite extremely limited resources, HISC and its invasive species committees have successfully eradicated dozens of outbreaks of invasive pests throughout the islands - preventing millions of dollars' worth of damages and the irreversible degradation of our islands' environmental and cultural integrity, and our quality of life. They also continue to work tirelessly to help manage established pests and mitigate the impacts they have on our communities and landscapes.

The Department of Agriculture, in contrast, continues to demonstrate an inability or unwillingness to fulfill its critical and exclusive regulatory responsibilities, even after receiving "historic" funding last year that [remains largely unspent](#).

SB 1100 has the commendable goal of ensuring the Department of Agriculture finally embraces its unique roles in our biosecurity framework. However, its specific provisions to have an untested Department of Agriculture deputy of biosecurity direct HISC and other entities focused on invasive species eradication and control may severely disrupt or dismantle some of the very few effective invasive species programs we have. This in turn could set us back years if not decades in our fight against invasive pests, leaving our islands ever more vulnerable to their devastating impacts.

**SB-1100**

Submitted on: 2/5/2025 7:38:15 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Erin Bishop	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chair and Committee Members,

I strongly oppose placing the Hawai'i Invasive Species Council under HDOA control. HISC has successfully coordinated multi-agency efforts over the years, while HDOA leadership decisions and prioritizations have hindered them. When HDOA stepped away from little fire ants and stopped its funding for Hawaii Ant Lab in 2021, it was the HISC that stepped in to find funding to keep HAL operating.

Housing all invasive species management within HDOA could set back invasive species management for years. Will HDOA tackle LFA, will they manage miconia, will they have an albizia mitigation program, will they monitor and sample for Rapid Ohia Death?

HDOA leadership may say they will support through funding these programs, but they also stopped the fight against LFA years ago, and with historic funding for LFA, they still don't support the Hawaii Ant Lab.

I strongly oppose giving HDOA the reigns on all invasive species decisions, funding and leadership.

**SB-1100**

Submitted on: 2/5/2025 12:30:47 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Glenn Choy	Individual	Oppose	Written Testimony Only

Comments:

I strong oppose placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawaii Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview

**SB-1100**

Submitted on: 2/5/2025 7:54:55 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Solomon Champion	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Solomon Champion, and I am a concerned O‘ahu resident writing comments about SB1100, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Solomon Champion

**SB-1100**

Submitted on: 2/5/2025 9:12:12 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Alyssa Furman	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing you to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I do recognize the need for more enhanced biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant additional concerns about implementation, accountability, and resource allocation in these departments.

In transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity, as proposed by SB 1100, is problematic for several reasons. Assimilating them into the HDOA risks flawed prioritization of agricultural productivity over ecosystem health. Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into the HDOA risks limiting their ability to operate independently and nimbly, potentially slowing response times and reducing the impact of their work. Additionally, the HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

I would recommend that rather than giving additional resources to the HDOA, funds should be directed to organizations with proven success in invasive species management. The Hawai‘i Ant Lab and the Island Invasive Species Committees (ISCs), for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

While biosecurity is a critical issue for Hawai‘i, the approach of SB 1100 has many flaws. I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai‘i from invasive species. By investing in proven entities like the Hawai‘i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

Mahalo

**SB-1100**

Submitted on: 2/5/2025 8:17:29 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Sydney Zischka	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Sydney S Zischka, and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.**

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Sydney S Zischka

**SB-1100**

Submitted on: 2/5/2025 10:41:00 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sadie Green	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Sadie, and I am a resident of Maui. I am writing to provide the following comments on SB1100. I appreciate and support the provisions emphasizing the Department of Agriculture's unique role in our overall biosecurity strategy, particularly with the proposed renaming to the Department of Agriculture and Biosecurity. However, I strongly oppose placing the Department of Agriculture and the new Deputy of Biosecurity in charge of the Hawai'i Invasive Species Council (HISC) and other biosecurity programs outside the Department's current purview.

HISC and its county-based invasive species committees (ISCs) play a critical role in preventing invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan, engage the community, and take action to combat the ever-present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under the Department of Agriculture and Biosecurity (DAB) would be a significant mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent.

Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed Deputy of Biosecurity.

Thank you for your consideration.

Sincerely,

Sadie Green

**SB-1100**

Submitted on: 2/5/2025 10:34:09 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Avalon Paradea	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Avalon Paradea, and I am a concerned Hawai‘i resident writing comments about **SB1100**, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.

The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.

On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Avalon Paradea

Waikōloa, Hawai‘i

**SB-1100**

Submitted on: 2/4/2025 10:30:11 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Chris Frohlich	Individual	Oppose	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the critical need for robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns about the effectiveness of implementation, accountability, and resource allocation.

HDOA has a poor track record when it comes to effectively managing invasive species and enforcing existing regulations. For example, HDOA has struggled to adequately allocate resources to priority areas despite receiving funding for biosecurity programs in the past. Funds are often underutilized or directed away from pressing invasive species issues. HDOA has also failed to crack down on businesses responsible for transporting invasive species, such as the Little Fire Ant (LFA), interisland. Infested plants continue to be sold to unsuspecting customers, contributing to the spread of these harmful pests. Additionally, the department has consistently faced challenges in hiring and retaining skilled biosecurity professionals. Adding responsibilities without addressing staffing inefficiencies will exacerbate these issues and reduce program effectiveness.

Instead of giving additional resources to HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management. The Hawai‘i Ant Lab and the Invasive Species Committees, for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

SB1100 proposes transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity. This move is problematic for several reasons. Staff currently working under organizations like the Invasive Species Committees (ISCs) or the Department of Land and Natural Resources (DLNR) bring specialized knowledge and field experience. Assimilating them into the HDOA risks diluting their effectiveness by embedding them in a bureaucratic structure that prioritizes agricultural productivity over ecosystem health. Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into HDOA risks limiting their ability to operate independently and nimbly,

potentially slowing response times and reducing the impact of their work. HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

The creation of new roles, such as a Deputy Chairperson for Biosecurity, and additional programs may lead to unnecessary duplication of efforts rather than building on existing frameworks. For example, the Hawai'i Ant Lab and ISCs already manage detection and rapid response for many invasive species. Adding another layer of administration could create inefficiencies and confusion over roles and responsibilities. Civil Beat and other sources have highlighted similar concerns, noting that past restructuring efforts often resulted in overlaps that hindered effective action against invasive species.

The proposed appropriation of funds under SB1100 would be better spent bolstering existing programs and partnerships with proven track records. For example, increasing funding for the Hawai'i Ant Lab would allow them to expand their efforts to control LFAs and other harmful ant species. Supporting the ISCs would enhance community-based invasive species management programs, which are more flexible and responsive than centralized bureaucratic approaches. Improving interagency collaboration and streamlining existing efforts would ensure resources are used effectively and efficiently. There is a greater need for clear lines of communication and collaboration among existing agencies, rather than layering new structures on top of ineffective systems.

While biosecurity is a critical issue for Hawai'i, SB1100's approach is flawed. HDOA's history of mismanagement and inefficiency, combined with the risks of assimilating effective programs into a centralized bureaucracy, make this measure an unsuitable solution. I urge the committee to reconsider SB1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species. By investing in proven entities like the Hawai'i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

Thank you for the opportunity to testify.

Sincerely,

Chris Frohlich

**SB-1100**

Submitted on: 2/5/2025 12:59:16 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Jane Beachy	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Jane Beachy and I'm a concerned kama'aina writing comments regarding SB1100, addressing biosecurity. I appreciate and support the provisions to support the Department of Agriculture, and emphasize the need for HDOA's support of invasive species issues and biosecurity. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.**

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. HISC and DLNR have successfully raised millions in federal funds for biosecurity and invasive species management. While more funding is needed, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species. Managing invasive species and biosecurity is too big for any one department.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalo for your consideration.

Sincerely,

Jane Reppun Beachy

**SB-1100**

Submitted on: 2/5/2025 6:15:04 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Talia Portner	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Talia Portner and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Talia Portner

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, Fukunaga, and Members of the Committees,

My name is Meghan McBrearty, and I am a concerned O‘ahu resident writing comments about **SB1100**, relating to biosecurity. I am particularly concerned that this bill would move the Invasive Species Council from the Department of Land and Natural Resources to the Department of Agriculture and Biosecurity (currently named the Department of Agriculture).

This concerns me because:

- Managing invasive species and biosecurity is too big for any one department. Coordinating resources and responsibilities across multiple Departments is a more successful approach, just like the approach of the New Zealand government.
- The Invasive Species Council and the Department of Land and Natural Resources have successfully raised millions in federal funds for biosecurity and invasive species management.
- On the contrary, the Department of Agriculture has had problems filling critical positions, spending funds quickly for time sensitive projects, obtaining federal funds, retaining leadership, and coordinating with other invasive species and biosecurity organizations.

Thank you for the opportunity to provide testimony on SB1100.

Mahalo,

Meghan McBrearty

**SB-1100**

Submitted on: 2/5/2025 9:23:54 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
John L Reppun	Individual	Oppose	Written Testimony Only

Comments:

Aloha and Good Morning Respective Committee Chairs, Members:

Mahalo for the opportunity to submit testimony relating to this critical subject - BioSecurity for these remote islands in the middle of the Pacific. While I appreciate the intent of the work that State agencies and affiliated initiatives have attempted over the past few decades, we must admit that we have failed in critical ways. The "proof is in the pudding" as they say; after years of LFA and Coqui spreading across the island of Hawaii, the island of Oahu is beginning to experience the same. resulting in a wake-up call that was the topic of much discussion in the 2024 legislative session. As you deliberate, O'ahu continues to scramble to address expanding Little Fire Ant infestations, the rapid sweep of Coconut Rhinoceros Beetles throughout the island's palm population, an expanding Coqui frog presence that is climbing from Waimanalo over the ridges of the Ko'olau to Niu Valley. Our windward side communities - I live and work in Ko'olaupoko - have helped to sound the alarm even as we have waded in to help, mustered together private funding for treatment and attended multiple meetings/gatherings to help educate. As we've done so, participating as any & all community members must, it is clear that much of the failure in our collective response both here and across the state, falls in the lap of a weakened, under-staffed and overwhelmed Department of Agriculture, rendering it unable to respond and defensive with respect to a failure to effectively collaborate - as they must (!) - with other agencies and entities to address the problem of multiple invasives.

The above said, now is NOT the time - during session - to pass a 90 pp bill that attempts to extensively reorganize our islands' response to the issue of invasives. If the intent of this bill is to "stir the pot", incite urgency in the conversation, urge us all to re-examine our systemic response...wonderful, but do NOT pass this bill. Defer, hold, but push the conversation forward such that between sessions, we can all - elected folks, community members, county folks, funders and more - be a part of a robust discussion prior to legislative action, if we make progress, by the 2026 session.

In the meantime, insist that DOA follow through - and quickly - with use of funding that was allocated to that department last session, some \$10 million, for staffing etc. Insist that they work with others such as the Invasive Species Committees, CGAPS, the Hawaii Ant Lab, other agencies (DLNR and DOT especially) during the coming year such that existing collaborative networks can actually and effectively work! And with the imminent and very visible threat of

invasives finally having gotten the attention of communities around the state, we are ready, willing and able to participate and contribute with effect.

Lastly, may I respectfully suggest: while we all scramble for limited funding to address a massive problem, lets instead assemble (and quickly; we have the means/info necessary) a concerted effort to educate those WITH the means such that they can help us achieve success. By "they", I mean the many (20?30?) billionaires who love their palm trees swaying, like we do. Can we pull together a a compelling ask? Of course we can. Can we assemble a convincing team to make that ask? Of course we can. After all, what's a \$20K drone or ten, with product to dispense for a Zuckerberg? What's several million a year for ten or twenty years of research needed to find an antidote for CRB to a Windfrey, an Ellison, a Case, a Benioff....

Nothing ventured; nothing gained! Please hold the bill but ramp up the intersession conversation!

Respectfully, John L. Reppun, Waiahole resident, farmer, rabble rouser & partner to the process.

**SB-1100**

Submitted on: 2/5/2025 4:42:41 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Jean Fujikawa	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.**

While I recognize and appreciate this measure’s effort to get the Department of Agriculture (DOA) to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB would most likely set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

**SB-1100**

Submitted on: 2/5/2025 8:53:03 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Donny Marez	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālolo, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Donny Marez and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Donny Marez

**SB-1100**

Submitted on: 2/5/2025 8:53:03 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Donny Marez	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Donny Marez and I am writing today to offer the following COMMENTS on SB 1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing

responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Donny Marez

**SB-1100**

Submitted on: 2/5/2025 8:54:04 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Liat Portner	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Liat Portner and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as

regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,

Liat Portner

**SB-1100**

Submitted on: 2/5/2025 9:12:44 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Heather Forester	Individual	Oppose	Written Testimony Only

Comments:

Thank you for the opportunity to submit testimony on SB1100. I strongly oppose this bill. Adding more responsibility to a department that is already struggling will only worsen the problem. I have sat through several legislative sessions in 2024 and 2025, and the elected officials present had many concerns about HDOA's ability to complete the tasks they are currently assigned.

The success stories on invasive species have really come from the hard work done by the Island Invasive Species Committees and the Hawaii Ant Lab, work all supported by the Hawaii Invasive Species Council. Dragging these programs into the bureaucracy of the HDOA would only prohibit them from continuing the good work that is being done to combat invasive species.

HDOA should resolve existing issues they have within the department before taking on any additional responsibility.

**SB-1100**

Submitted on: 2/5/2025 3:41:44 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Lory Ono	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Lory Ono, and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Lory Ono

**SB-1100**

Submitted on: 2/5/2025 2:29:44 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Kylie Hopkins	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Kylie Hopkins and I am a student at UHM, studying sustainability. I am writing today to offer the following comments on SB1100. I support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - in order to embrace the particular and unique role in the overall biosecurity strategy. However, **I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current role.**

While I recognize this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage communities, and take action to hold the line and push back against the ever present threat of invasive species. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back in the fight against invasive species.

I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Mahalo,  
Kylie Hopkins

**SB-1100**

Submitted on: 2/5/2025 2:28:41 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Ellie Cory	Individual	Oppose	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Ellie Cory and I am writing today to offer my feedback on SB1100. I appreciate the provisions to emphasize the need for the Department of Agriculture to be renamed to the Department of Agriculture and Biosecurity to embrace the particular and unique role in our overall biosecurity strategy, however, I strongly oppose placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its LONG neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan, engage the community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, and lack of support from the Department of Agriculture, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups. Moving HISC and their invasive species committees under DAB would be a big mistake with extremely negative consequences. The Department of Agriculture has proven time and time again to be an unfit, irresponsible steward of the ‘āina that other groups such as HISC are working tirelessly to protect. Even after receiving historic amounts of funding last year, much of that money remains unspent, and issues related to biosecurity are left unresolved. Shifting power into the hands of the Department of Agriculture will not only undo all of the work that has been done, but also set us back years in the fight against invasive species.

I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear

benchmarks for actions and outcomes, and the initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalos for your consideration.

-Ellie Cory

**SB-1100**

Submitted on: 2/5/2025 9:16:09 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Shaya Honarvar	Individual	Oppose	Written Testimony Only

Comments:

**Shaya Honarvar, MS, Ph.D.**

**Individual Testimony**

**February 5, 2025**

**RE: SB1100 – Oppose – providing comments regarding SB1100, Relating to Biosecurity.**

Aloha Chairs, Vice Chairs, and Members of the Committees,

Thank you for the opportunity to provide testimony regarding SB 1100, Relating to Biosecurity.

Please accept this written testimony in opposition to SB 1100, Relating to Biosecurity. While I appreciate and support the legislature’s continued focus on invasive species, I am deeply concerned about SB 1100 and the predictably catastrophic financial and environmental consequences that passing of SB 1100 (in its current form) would have on Hawai‘i.

For example, Part VII, beginning on page 73, line 9 seeks to moves the Hawai‘i Invasive Species Council (HISC or The Council) to “within the Department of Agriculture and Biosecurity,” and provides that HISC will be “overseen” by the new Deputy Chairperson for Biosecurity (page 23, line 2)”

If anything, the independence and autonomy of HISC should be increased and secured for the future, which is the opposite of what would happen were The Council to be moved under HDOA.

Since its inception in 2003, HISC has been an autonomous council with support from DLNR and has served as a hub to bring together the multiple state agencies with shared and/or overlapping regulatory authority to coordinate prevention, detection, and response to the introduction of invasive species. HISC is already co-chaired by the chairs of HDOA and DLNR, and committee members are chairs or directors of every branch of state government with relevant authority. Additional participants include State Senators and Representatives, other state agencies, County Mayors and Federal agency representatives from the U.S. Departments of the Interior, Agriculture, and Defense.

Moving HISC under HDOA would strip The Council of its autonomy, and thoroughly undermine the ability of The Council to facilitate and coordinate efforts across state and federal agencies and other key stakeholder groups. HDOA is, by definition, mandated to support and advance the interests of agriculture and the agriculture industry in Hawai‘i. Since its formation HDOA has supported and facilitated Agriculture Industries such as cattle, sugar cane, and pineapple that prioritize profits for a small group of wealthy businessmen and corporations over the interests of (and at the expense of) Hawai‘i’s citizens and the states’ natural resources.

HDOA’s operational sphere with regard to invasive species has always been focused on species of concern to agricultural interests. For more than 125 years HDOA has had both responsibility and authority for preventing the introduction of invasive plants, insects, and animals, yet the introduction of so many of the invasive species currently wreaking havoc on terrestrial and marine ecosystems across the state have been directly linked to the agriculture industry.

Based on past performance and recent informational briefings to legislative committees (for example AGR-AEN Info Hearing 01/17/2025), HDOA has demonstrated that they lack the infrastructure, expertise, organizational agility, fiscal transparency, and willingness to collaborate required to be placed in primary control of the most important multi-agency council that guides and supports coordination and collaboration of invasive species response and management which impacts all aspects of Hawai‘i’s environment, ecosystem services, natural resources.

Further, Part III of SB 1100 beginning on page 22 creates a new Deputy Chairperson for Biosecurity (DCB), that is exempt from Hawai‘i’s civil service law. This position would not require a public hearing or Senate approval, despite the critical responsibilities of the DCB role, which raises further concerns about accountability and transparency.

Thank you for the opportunity to provide testimony on SB1100.

**SB-1100**

Submitted on: 2/5/2025 10:45:25 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Shay Chan Hodges	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

**SB-1100**

Submitted on: 2/5/2025 9:40:01 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Elizabeth Speith	Individual	Comments	Written Testimony Only

Comments:

Testimony of Elizabeth Speith Regarding SB 1100 – Relating to Biosecurity  
Senate Committee on Agriculture and Environment, Transportation and Culture and the Arts,  
and Commerce and Consumer Protection

Hearing Date: February 6, 2025

Time: 9:30 AM

Place: Conference Room 229 & Videoconference State Capitol

Aloha Chair Gabbard, Chair Lee, Chair Keohokalole, Vice Chairs, and Members of the  
Committees,

My name is Elizabeth Speith, a resident of Maui, and I submit this testimony as an individual with experience in invasive species management in Hawai‘i spanning over 20 years. I appreciate the Legislature's commitment to strengthening biosecurity and addressing invasive species threats. **I am writing in support of portions of SB1100, while expressing serious concerns regarding specific provisions**, particularly the proposed transfer of the Hawai‘i Invasive Species Council (HISC) from the Department of Land and Natural Resources (DLNR) to the newly renamed Department of Agriculture and Biosecurity (HDOA).

**Support for Expanded Pest Management Plans & Transitional Facilities** – I strongly support the bill's provisions for innovative community pest management plans, expanded transitional facilities, and contracted inspectors to enhance import security. However, care must be taken to ensure oversight of private inspectors to prevent "regulatory capture," where industry influence could weaken enforcement.

**Concerns Regarding the Transfer of HISC to HDOA**

1. **Broad Mandate of HISC** – The HISC was created to coordinate across multiple agencies, addressing invasive species that impact agriculture, natural ecosystems, human health, and infrastructure. While HDOA plays a crucial role in biosecurity, its primary focus is agriculture. Moving HISC to HDOA may inadvertently skew priorities toward agricultural concerns, potentially at the expense of watershed protection, marine biosecurity, human health risks, and invasive species impacts beyond agriculture. HISC has successfully supported collaboration between not only state agencies but also between private and public sectors, funding crucial initiatives like the Island Invasive

Species Committees, the Hawai‘i Ant Lab, and numerous other programs whose successes lie in community partnerships and effective outreach.

2. **Loss of Cross-Agency Oversight & Coordination** – HISC's strength lies in its ability to coordinate efforts between agencies, including DLNR, DOH, DOT, UH and others. Since its establishment in 2003, HISC has been hosted at DLNR, during which the Council has maintained an autonomy that enables decision-making reflecting input from all six represented agencies. This autonomy is reflected in the focus of HISC decisions, resolutions, and funding of projects that emphasize collaboration and community buy-in and are not skewed in the direction of only one mandate or agency. Given HISC's proven track record of fostering inter-agency cooperation and achieving meaningful outcomes under its current arrangement, restructuring could jeopardize the collaborative framework.
3. **House Bill 427 Does Not Propose This Move** – House Bill HB 427, "A BILL FOR AN ACT RELATING TO BIOSECURITY," includes many biosecurity improvements without moving HISC to HDOA. If this parallel biosecurity legislation does not find this transfer necessary, it raises the question: is such a transfer truly needed?
4. **Lessons from New Zealand** – New Zealand's approach to biosecurity exemplifies the strength of multi-agency coordination, with entities like the Ministry for Primary Industries, the Department of Conservation, and regional councils working in concert. Their success demonstrates how distributed, collaborative governance can effectively protect both agricultural and natural resources. This aligns well with Hawai‘i's current successful multi-agency approach to invasive species management.

I respectfully suggest that strengthening biosecurity capacity **should complement – not replace – existing cooperative frameworks** that have proven successful. Thank you for your continued commitment to strengthening Hawai‘i's biosecurity system.

Respectfully,  
Elizabeth Speith  
Ha‘ikū, Maui

**SB-1100**

Submitted on: 2/5/2025 9:24:01 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Madison Owens	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Madison Owens and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Madison Owens

**SB-1100**

Submitted on: 2/5/2025 12:00:22 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sherry Pollack	Individual	Comments	Written Testimony Only

Comments:

I am writing today to offer the following COMMENTS on SB1100. I support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to acknowledge their role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for the opportunity to testify.

**SB-1100**

Submitted on: 2/4/2025 8:37:45 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
William Reese Liggett	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is William Reese Liggett and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Reese Liggett

**SB-1100**

Submitted on: 2/5/2025 1:10:24 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Gregory Misakian	Individual	Comments	Written Testimony Only

Comments:

The Hawaii Invasive Species Council should not be moved to the Department of Agriculture, but should remain an independent organization which is administratively attached to the Department of Land and Natural Resources.

Gregory Misakian

**SB-1100**

Submitted on: 2/4/2025 7:04:36 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Nanea Lo	Individual	Comments	Written Testimony Only

Comments:

Hello Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Nanea Lo, and I am writing today to offer the following **COMMENTS on SB1100**. I appreciate and support the provisions that emphasize the need for the Department of Agriculture—to be renamed the Department of Agriculture and Biosecurity (DAB)—to embrace its particular and unique role in our overall biosecurity strategy. **However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council (HISC) and other biosecurity programs outside the Department of Agriculture’s current purview.**

While I recognize and appreciate this measure’s effort to push the Department of Agriculture to fulfill its long-neglected role in biosecurity, I have serious concerns about placing HISC and other external programs and projects under the rebranded DAB, as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan, engage the community, and take action to hold the line and push back against the ever-present threat of invasive species. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a significant mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward. These amendments should include:

- Regular reporting requirements to the Board of Agriculture and the public,

- Deadlines for invasive species action plans with clear benchmarks for actions and outcomes,
- Initial and biannual confirmation hearings for the appointed deputy of biosecurity.

I respectfully ask that you reconsider the restructuring of HISC and its related programs within DAB and ensure that any changes to our biosecurity strategy strengthen, rather than weaken, our ability to address invasive species effectively.

Me ke aloha 'āina,

Nanea Lo  
Mō'ili'ili, HI 96826  
Sierra Club of Hawai'i Executive Commission Member  
Board Member, Hawai'i Workers Center  
Kanaka Maoli / Lineal Descendant of the Hawaiian Kingdom

**SB-1100**

Submitted on: 2/4/2025 4:20:31 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Lisa Seikai Darcy	Individual	Comments	Written Testimony Only

Comments:

Aloha Committee members,

My name is Lisa Darcy and I reside in Maui County here to testify on SB1100 **requesting the Committees remove provisions placing HISC and other critical biosecurity entities under the Department of Agriculture, to answer to a new deputy of biosecurity.**

**As a neighbor island, I recognize the dynamics needed to move good bills forward into great bills.** I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I **STRONGLY OPPOSE** placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Mahalo plenty,

Lisa Darcy

Kula, HI 96790

**SB-1100**

Submitted on: 2/4/2025 7:28:51 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Summer Said	Individual	Comments	Written Testimony Only

Comments:

My name is Summer and I am writing today to provide comments on SB1100. I appreciate and support the provisions that highlight the importance of renaming the Department of Agriculture to the Department of Agriculture and Biosecurity, recognizing its vital role in our broader biosecurity strategy.

However, I OPPOSE assigning the Department of Agriculture and the newly appointed deputy of biosecurity authority over the Hawai‘i Invasive Species Council and other biosecurity programs that currently fall outside the department’s jurisdiction.

Additionally, I urge you to consider amendments that enhance accountability for the department and deputy moving forward. These could include regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks, and initial and biannual confirmation hearings for the deputy of biosecurity.

Thank you for your time and consideration.

**SB-1100**

Submitted on: 2/4/2025 5:42:11 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Marcia Kemble	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Marcia Kemble and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Mahalo for your consideration.

Marcia Kemble

Makiki

**SB-1100**

Submitted on: 2/4/2025 4:06:52 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Julio Magalhães	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council (HISC) and other biosecurity programs outside the Department of Agriculture's current purview.

As a hike leader on Kaua'i I have had direct experience with the effectiveness of the HISC through my interaction with the Kaua'i Invasive Species Committee (KISC). I observed and participated in their outreach and education around Rapid Ohia Death (ROD) fungus. They have very proactively established and maintained boot cleaning stations and informational signs at most trailheads and encouraged me to educate hikers I led on ROD and preventative measures. My assessment is that it would be very imprudent to disrupt this very effective network of local committees coordinated through the HISC. Trying to incorporate this effective work by the HISC into an untested and unproven DAB is unwise until the DAB has demonstrated effectiveness and responsiveness in the control of invasive species.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Julio Magalhães

**SB-1100**

Submitted on: 2/4/2025 5:46:44 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Chuck Chimera	Individual	Comments	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs, and Members of the Committees,

Mahalo for the opportunity to provide testimony on SB100. I commend the legislature’s commitment to strengthening Hawai‘i’s biosecurity and addressing the urgent threats posed by invasive species. While I support the bill’s overarching goals, I respectfully urge the committee to reconsider the proposed transfer of the Hawai‘i Invasive Species Council (HISC) from the Department of Land and Natural Resources (DLNR) to the newly proposed Department of Agriculture and Biosecurity (DOAB).

HISC has been a cornerstone of Hawai‘i’s invasive species management strategy, serving as a neutral, interagency coordinating body that transcends the jurisdiction of any single department. Its current structure allows it to operate with the independence and flexibility necessary to address invasive species threats across multiple sectors—agriculture, conservation, infrastructure, public health, and beyond. This holistic, science-based approach has been critical to its success.

Transferring HISC to the DOAB risks narrowing its focus to agricultural concerns, potentially sidelining efforts to combat invasive species that threaten native forests, watersheds, coral reefs, and biodiversity. These ecosystems are not only vital to Hawai‘i’s environmental health and resilience but also deeply intertwined with our cultural heritage, water security, and economic well-being.

One of HISC’s greatest strengths lies in its ability to foster collaboration among federal, state, county, and private-sector partners. Its current placement enables it to work seamlessly across agencies, including the DLNR, Department of Agriculture (DOA), Department of Health, University of Hawai‘i, county governments, and federal entities such as the U.S. Fish and Wildlife Service and the USDA. This interagency model has been instrumental in addressing cross-sector threats like rapid ‘ōhi‘a death, invasive plants of the watershed like miconia, and aquatic invasive species.

While agricultural biosecurity is undeniably important, HISC’s mandate extends far beyond agriculture. It has been a steadfast advocate for addressing invasive species that impact native ecosystems, marine environments, and public health—areas that may not align with the primary objectives of an agriculture-focused department. By maintaining HISC’s autonomy and broad

collaborative mandate, we can ensure that all invasive species threats are addressed equitably and effectively.

I respectfully urge the committee to preserve HISC as an independent, interagency body administered under DLNR rather than transferring it under the DOAB. Maintaining HISC's ability to collaborate across departments, engage with diverse stakeholders, and advocate for both agricultural and environmental biosecurity concerns will be essential to safeguarding Hawai'i's natural resources, cultural landscapes, and economic vitality.

Thank you for considering this perspective. I deeply appreciate your dedication to protecting Hawai'i from the growing threats posed by invasive species.

Mahalo,  
Chuck Chimera  
Honokaa, HI

**SB-1100**

Submitted on: 2/4/2025 4:33:53 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Eileen Herring	Individual	Comments	Written Testimony Only

Comments:

Aloha,

I am submitting written testimony today to offer the following COMMENTS on SB1100.

I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to lead our overall biosecurity strategy. However, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB).

The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

I also urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, and deadlines for invasive species action plans with clear benchmarks for actions and outcomes.

Mahalo,

Eileen Herring

**SB-1100**

Submitted on: 2/5/2025 2:02:41 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Michael Koster	Individual	Comments	Written Testimony Only

Comments:

I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the appointed deputy of biosecurity.

**SB-1100**

Submitted on: 2/5/2025 8:48:00 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sidney Lynch	Individual	Support	Written Testimony Only

Comments:

I support this bill. I live in the back of Palolo Valley where there are coqui frogs that came from the Big Island to Kawamoto Orchid Farm further up in the valley. The DOA sends people regularly to try to control the coqui. They are woefully understaffed and underfunded in this effort. They partner with OISC (Oahu Invasive Species Control) thru UH which is also way underfunded. Hawaii needs to be proactive in catching these pests not reactive. Part of the effort is stopping the pests from coming in but also need more funding for this kind of pest control and eradication.

**SB-1100**

Submitted on: 2/5/2025 8:48:00 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Sidney Lynch	Individual	Support	Written Testimony Only

Comments:

I support this bill. I live in the back of Palolo Valley where there are coqui frogs that came from the Big Island to Kawamoto Orchid Farm further up in the valley. The DOA sends people regularly to try to control the coqui. They are woefully understaffed and underfunded in this effort. They partner with OISC (Oahu Invasvie Species Control) thru UH which is also way underfunded. Hawaii needs to be proactive in catching these pests not reactive. Part of the effort is stopping the pests from coming in but also need more funding for this kind of pest control and eradication.

**COUNTY COUNCIL**

Mel Rapozo, Chair  
KipuKai Kualii, Vice Chair  
Addison Bulosan  
Bernard P. Carvalho, Jr.  
Felicia Cowden  
Fern Holland  
Arryl Kaneshiro



**OFFICE OF THE COUNTY CLERK**

Jade K. Fountain-Tanigawa, County Clerk  
Lyndon M. Yoshioka, Deputy County Clerk

Telephone: (808) 241-4188  
Facsimile: (808) 241-6349  
Email: [cokcouncil@kauai.gov](mailto:cokcouncil@kauai.gov)

**Council Services Division**  
4396 Rice Street, Suite 209  
Lihu'e, Kaua'i, Hawaii 96766

February 5, 2025

**TESTIMONY OF FERN HOLLAND  
COUNCILMEMBER, KAUAI COUNTY COUNCIL**

**ON**

**SB 1100, RELATING TO BIOSECURITY**

Senate Committee on Agriculture

Senate Committee on Transportation and Culture and the Arts

Senate Committee on Commerce and Consumer Protection

Thursday, February 6, 2025

9:30 a.m.

Conference Room 229

Via Videoconference

Dear Chair Gabbard, Chair Lee, Chair Keohokalole, and Members of the Committees:

Thank you for this opportunity to provide testimony in SUPPORT of SB 1100, Relating to Biosecurity. My testimony is submitted in my individual capacity as a member of the Kaua'i County Council.

Thank you for supporting the major threats we face around invasive species.

I have significant concern regarding Part VII Section 32 (page 73) that moves Hawai'i Invasive Species Council (HISC) under the newly named Hawai'i Department of Agriculture (HDOA) and Biosecurity (HDOAB). While I appreciate the intent, HISC is a large multi-agency council which is co-chaired by HDOA and Department of Land and Natural Resources (DLNR). Currently, HISC is housed under DLNR administratively only. According to our Kaua'i Invasive Species Committee (KISC), HISC has supported a large amount of work on invasive species across the state and the partnerships with other islands.

HDOA is massively over stretched and given such a huge range of responsibility, much of which is increasingly difficult to do with increasing number of I cause species spreading to multiple islands.

KISC has been able to do significant work with this operational support from HISC in its current structure and this support is vital to our fight, specifically against our growing infestation of Coconut Rhinoceros Beetles (CRB) and is in a critical time where we have gone from detection to an explosion in populations.

The growing threat of CRB is one of the largest invasive species threats we may have ever faced in recent years. This species threatens many of our core agricultural crops and important cultural sites and plant species (such as our endemic Loulu, *Pritchardia*, palms and Hala, *Pandanas*) as well as our renowned and historical groves along the Royal Coconut Coast and the overall landscape look and tropical visual image of Kaua'i and Hawai'i.

Chair Gabbard, Chair Lee, Chair Keohokalole, and Members of the Committees  
Re: SB 1100, Relating to Biosecurity  
February 5, 2025  
Page 2

It is hard to even begin to calculate the economic cost that CRB will have on Kaua'i. We must work collaboratively to be all in on eradication efforts and respond with unprecedented biosecurity actions.

Please do everything you can to fast-track action and response, education and funding to address the threats of invasive species.

Thank you again for this opportunity to provide testimony in support of SB 1100. Should you have any questions, please feel free to contact me or Council Services Staff at (808) 241-4188 or via email to [cokcouncil@kauai.gov](mailto:cokcouncil@kauai.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "F. Holland", written in a cursive style.

FERN HOLLAND  
Councilmember, Kaua'i County Council

AAO:dmc

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

I thank you for this measure and the intent to create committed leadership and focus to addressing invasive pests.

**I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.**

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

I support the distributed and localized model for addressing agriculture biosecurity issues in our communities and counties.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Mahalo for your consideration.

na U'ilani Naipo

**SB-1100**

Submitted on: 2/4/2025 9:31:22 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Kara Marlowe	Individual	Support	Written Testimony Only

Comments:

Dear Chair and Members of the Committee,

I am writing to express my opposition to SB 1100, which proposes renaming the Department of Agriculture (HDOA) as the Department of Agriculture and Biosecurity and significantly restructuring its responsibilities. While I support the need for robust biosecurity measures to protect Hawai‘i’s ecosystems and agriculture, this measure raises significant concerns about implementation, accountability, and resource allocation.

Transferring the Invasive Species Council and other biosecurity staff to the newly restructured Department of Agriculture and Biosecurity, as proposed by SB 1100, is problematic for several reasons. Staff currently working under organizations like the ISCs or the Department of Land and Natural Resources (DLNR) bring specialized knowledge and field experience. Assimilating them into the HDOA risks diluting their effectiveness by embedding them in a bureaucratic structure that prioritizes agricultural productivity over ecosystem health. Agencies like the ISCs operate with a collaborative, cross-agency approach that has been instrumental in responding quickly to invasive species threats. Folding these efforts into the HDOA risks limiting their ability to operate independently and nimbly, potentially slowing response times and reducing the impact of their work. Additionally, the HDOA has historically focused on agriculture, not biosecurity. Expanding their mandate without ensuring a cultural and operational shift could mean that biosecurity becomes a secondary priority rather than an integrated focus.

The HDOA has a poor track record in effectively managing invasive species and enforcing existing regulations. Despite receiving generous funding for biosecurity programs in the past, the HDOA has struggled to allocate these resources efficiently to priority areas. Funds are often underutilized or directed away from pressing invasive species issues. Additionally, the HDOA has failed to crack down on businesses responsible for transporting invasive species, such as the Little Fire Ant (LFA), interisland. Infested plants continue to be sold to unsuspecting customers, contributing to the spread of these harmful pests. Furthermore, the department has consistently faced challenges in hiring and retaining skilled biosecurity professionals. Adding responsibilities without addressing staffing inefficiencies will exacerbate these issues and reduce program effectiveness.

Moreover, both the Hawaii Invasive Species Council (HISC) and the Coordinating Group on Alien Pest Species (CGAPS) have attempted to work with the HDOA but have found the department to be unhelpful and uncommunicative with coordination and information sharing.

Incorporating the HISC into the HDOA will not improve this issue. The HDOA's history of poor communication and uncooperative behavior with HISC and CGAPS indicates that merging these entities will not resolve the fundamental issues of coordination and information sharing.

Rather than giving additional resources to the HDOA, which has demonstrated systemic shortcomings, funds should be directed to organizations with proven success in invasive species management. The Hawai'i Ant Lab and the Island Invasive Species Committees (ISCs), for instance, have accomplished significant progress in invasive species detection, management, and eradication despite operating with far fewer resources. These entities are better equipped and more results-driven, making them a more effective investment.

While biosecurity is a critical issue for Hawai'i, the approach of SB 1100 is flawed. The HDOA's history of mismanagement and inefficiency, combined with its poor record in collaborating with HISC and CGAPS, make this measure an unsuitable solution. I urge the committee to reconsider SB 1100 and focus on strengthening and funding existing programs and partnerships that have demonstrated success in protecting Hawai'i from invasive species. By investing in proven entities like the Hawai'i Ant Lab and the ISCs, we can ensure that biosecurity efforts are both effective and accountable.

**SB-1100**

Submitted on: 2/4/2025 8:45:16 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Angelica Melone	Individual	Support	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, and Keohokalole, Vice Chairs Richards, Inouye, and Fukunaga, and Members of the Committees,

As a concerned individual and resident of Hawai‘i, I am writing in **strong support of SB1100**, which renames the Department of Agriculture to the Department of Agriculture and Biosecurity and strengthens biosecurity efforts for our state. Given Hawaii's unique and isolated location, biosecurity must be a top priority to protect our land, agriculture, and natural resources from the ongoing threats posed by invasive species. This bill ensures that biosecurity is recognized as essential and that the Department of Agriculture takes the lead in safeguarding Hawaii's agricultural industry.

Mahalo for the opportunity to testify on this important measure.

**SB-1100**

Submitted on: 2/3/2025 5:31:36 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Jacob Wiencek	Individual	Support	Written Testimony Only

Comments:

Aloha Committee Members,

Biosecurity is a foremost concern for Hawaii. We are faced with daily challenges that are growing in complexity. I believe these reforms are necessary to address the challenges we face. I urge this Committee to SUPPORT this bill!

**SB-1100**

Submitted on: 2/4/2025 3:29:33 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

Submitted By	Organization	Testifier Position	Testify
Bo Breda	Individual	Support	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālole, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Bo Breda and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai‘i Invasive Species Council and other biosecurity programs outside the Department of Agriculture’s current purview.

While I recognize and appreciate this measure’s effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai‘i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Bo Breda

**SB-1100**

Submitted on: 2/4/2025 6:16:35 AM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
John R. Gordines	Individual	Support	Written Testimony Only

Comments:

I am in support of SB 1100

**SB-1100**

Submitted on: 2/3/2025 6:55:30 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Lois Crozer	Individual	Support	Written Testimony Only

Comments:

I don't know the background to this bill but we need to hold people accountable for importing pests into our islands. I remember the nursery in Waimanalo was still selling plants with little fire ants even after we told them they were there. Need to have penalties and fund the enforcement before it's too late.

**SB-1100**

Submitted on: 2/4/2025 3:30:46 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Peter Wilson	Individual	Support	Written Testimony Only

Comments:

Aloha Chairs Gabbard, Lee, Keohokālolo, Vice Chairs Richards, Inouye, Fukunaga, and members of the Committees,

My name is Peter Wilson and I am writing today to offer the following COMMENTS on SB1100. I appreciate and support the provisions to emphasize the need for the Department of Agriculture - to be renamed the Department of Agriculture and Biosecurity - to embrace the particular and unique role in our overall biosecurity strategy. However, I STRONGLY OPPOSE placing the Department of Agriculture and the new deputy of biosecurity in charge of the Hawai'i Invasive Species Council and other biosecurity programs outside the Department of Agriculture's current purview.

While I recognize and appreciate this measure's effort to get the Department of Agriculture to embrace its long-neglected role in biosecurity, I have serious concerns about placing the Hawai'i Invasive Species Council (HISC) and other external programs and projects under the rebranded Department of Agriculture and Biosecurity (DAB), as well as the lack of accountability mechanisms for the proposed deputy of biosecurity.

HISC and its county-based invasive species committees (ISCs) play a critical role in stopping invasive pests before they cause lasting damage to our environment, food systems, and communities. HISC coordinates across agencies to research, plan around, engage community, and take action to hold the line and push back against the ever present threat of invasive pests. Despite limited funding, these teams have successfully prevented millions of dollars in damages by responding quickly to outbreaks, leading eradication efforts, and working with community groups to protect our forests, watersheds, and neighborhoods.

Moving HISC and the ISCs under DAB would be a big mistake with potentially devastating consequences. The Department of Agriculture has struggled for years to meet its existing responsibilities, and even after receiving historic levels of funding last year, much of that money remains unspent. Shifting control of our already successful invasive species programs to an untested structure within DAB could set us back years in the fight against invasive species.

Further, I urge you to consider amendments that will better ensure the department and deputy are held accountable to their responsibilities going forward, such as regular reporting requirements to the Board of Agriculture and the public, deadlines for invasive species action plans with clear benchmarks for actions and outcomes, and initial and biannual confirmation hearings for the

appointed deputy of biosecurity.

Thank you for your consideration.

Sincerely,  
Peter Wilson

## TESTIMONY IN SUPPORT OF SB1100

Aloha Chair Gabbard, Chair Lee, Chair Keohokalole, Vice Chair Richards, Vice Chair Inouye, Vice Chair Fukunaga, and Members of the Committees,

My name is Benton Pang, and I am testifying in strong support of SB1100, which strengthens Hawaii's biosecurity measures to prevent the introduction and spread of invasive species.

I have worked in Hawaii for 35 years on invasive species management and conservation restoration, collaborating with local communities, nonprofits, and government agencies to protect our native ecosystems. Throughout my career, I have witnessed firsthand the devastating impact of invasive species on our environment, agriculture, and local economy.

Each day, new species are introduced into our islands with little oversight, and the consequences are costly and difficult to manage. Species such as the Little Fire Ant, Mongoose, invasive ungulates, and mosquitoes have spread rapidly, threatening native biodiversity and straining the resources of those tasked with mitigation. Mosquitoes, in particular, have been catastrophic to Hawaii's native forest birds, transmitting diseases such as avian malaria and avian pox, pushing several species toward extinction. Prevention is the most effective and cost-efficient strategy, yet our current biosecurity measures are insufficient to address the scale of this challenge.

SB1100 is a critical step forward in protecting Hawaii's natural and agricultural resources. By establishing a Deputy Chairperson for Biosecurity, strengthening emergency response capabilities, and developing transitional facilities for inspecting imports, this bill provides the oversight and infrastructure needed to prevent the introduction and spread of invasive species before they take hold.

Investing in biosecurity safeguards our native ecosystems, supports local agriculture, and reduces long-term management costs. I strongly urge the Committees to pass SB1100 to fortify Hawaii's biosecurity defenses and protect the future of our islands.

Mahalo for the opportunity to testify.

Sincerely,  
Benton Pang

3204 Carlos Long St, Honolulu, Hawai'i 96816

**SB-1100**

Submitted on: 2/5/2025 1:57:53 PM

Testimony for AEN on 2/6/2025 9:30:00 AM

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Testify</b>
Erik Horn	Individual	Support	Written Testimony Only

Comments:

As someone involved in the agriculture and conservation worlds, I do support this bill's intent. We do need to be more serious about biosecurity and introduction of damaging invasive species. Coordinating prevention, crisis response, and hopefully eradication, including of long established pests, requires a centralized locus of competency to get everyone working together in stopping invasive species problems.

While at first glance, the status quo with DLNR hosting much of these functions like the Invasive Species Council might seem logical, it's really not. DLNR and the conservation sphere of influence is really too far removed from the problem. They are impacted by it yes, but they are too remote to solve the problem effectively. The conservation sphere of things is too remote geographically, too remote economically, and too remote in world view, from where these invasive species problems are originating. The conservation sphere already knows how to be good stewards and are not creating these problems. But they are also not an adequate messenger to address and solve these problems.

HDOA and agricultural activities share a much greater proximity to the source of issues. Since almost all of these introduction problems originate within an urban or agricultural context. Psychologically it's just much easier to get Urban dwellers to listen to the guy selling coconuts at the farmers market than it is the crazy dude in the all weather rain jacket yelling from a mountaintop 30 miles away where you can't hear him. I don't like that, but it is what it is.

HDOA will be an engaged stakeholder and good steward in this upgraded biosecurity role. But I just urge all legislators to vote for this bill, but also to increase the funding allocated in it even more.