



Aloha Division of Aquatic Resources

August 13th, 2023

HULI PAC is a political action committee dedicated to uplifting leaders of integrity, demanding accountability, and redirecting the goals and priorities for Hawai'i Island. We are community advocates from all backgrounds— from every moku of our island—united under a platform of issues and solutions based on Hawaiian values.

We align with our trusted community leaders and defer to their 'ike Hawai'i as vital collaborative information to steer DAR towards a **restorative** and **regenerative** future around Hawaii Administrative Rules (HAR) Chapter 13-95. We live in a time when all herbivore species are in a degraded state of mass decline—a *CRISIS*.

We thank you for the intent of this rules package and offer the following recommendations and comments. We also thank you for your extensive effort in this rules package and for holding public hearings at each of our counties.

Our recommendation is to follow the actions of Kānaka Maoli fisher communities, subsistence fishers, and lifetime fishers, utilizing Ka Pa'akai Analysis for thorough scoping such as what Miloli'i has done to set forth Miloli'i CBSFA rules (2022), Kauhakō 'Ohana Association (Ho'okena), Hui 'Ohana O Hōnaunau, and Ho'ōla Kealakekua. Another exemplary action was that of Maui for their work to amend their island-wide herbivore rules in 2014 and this recent [land-to-sea data](#).

The tipping point for a coral collapse is here. We lack a healthy ecology and symbiotic relationships therefore, drastic measures to protect them are necessary. Uhu perform a critical function on our reefs, that we as humans can not be a substitute for. We need Uhu on our reefs in abundance for more than just food. We need them on our reef to increase reef resilience, and we must do all we can to make that happen!

We need transparency and cohesiveness in alignment with our trusted community partners 'ike Hawai'i, as how we interact with the ocean (on land and at sea) impacts its health and whether it can perpetuate life in perpetuity.

Therefore;

- ***We SUPPORT the proposed non-commercial rules as they are consistent with those in place at the community level (Miloli'i CBSFA, 2022) and island-wide (Maui Rules, 2014)***
- ***We, OPPOSE the commercial rules for Uhu and Kala and recommend they be removed from commercial take.***

After hearing testimony from Molokai, we feel Molokai should be consulted and appropriate island-wide herbivore rules be made so as not to hinder their ability to remain resilient, given their limited access to food, provisions, and services.

Thank you for this opportunity to comment that impacts ALL of our future here in Hawai'i.

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