

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

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May 5, 2020

Mr. James P. Griffin
Chairperson
Public Utilities Commission
465 South King Street #103
Honolulu, Hawaii 96813

Dear Chairperson Griffin and Members of the Public Utilities Commission:

Subject: Department of Agriculture Comments on Young Brothers Tariff
Transmittal No. 20-0003
For Approval of Emergency Changes to its Sailing Schedule

Thank you for the opportunity to express our very strong concerns about Young Brothers, LLC (YB) request for emergency changes to its sailing schedule between Honolulu, Kahului, Hilo, Kaunakakai, and Kaunapali. We are aware that the PUC approved YB's Tariff Transmittal on May 4, 2020 for a period of thirty days.

The Department of Agriculture does not dispute the "exceptional conditions created by COVID-19" that caused YB to request the changes to its sailing schedule. As we understand it, YB will be able to cover all nine regulated barge sailings with four rather than five tugs, resulting in reduced labor costs for manning the tug and shoreside labor for the thirty-day period.

The public testimonies we read raised concerns about the impact on livestock shipments (Molokai only) and other agricultural products from Molokai, Maui, and Hawaii islands. We note that the Consumer Advocate's statement only hinted at the impact on agricultural product and livestock shipment and YB's Tariff filing did not cover these issues whatsoever.

The Department finds the emergency nature of the Tariff action sought by YB allowed the public only 11 days to review and submit comments. We believe this is wholly inadequate for the affected agricultural operations to come to understand and make known what they believe to be the consequences of YB's proposal on their ability to ship their agricultural products from their respective islands to Oahu.



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The Department of Agriculture, in the strongest possible terms, recommends the PUC allow more time for additional input from other agricultural operators, organizations, other experts, and require an impact analysis be done to ensure that the severity of the impact on Hawaii agriculture resulting from the reduction in barge service is made known and considered by the PUC in their deliberations. This is particularly important if YB requests an extension of the temporary 30-day emergency change. Failing to consider the impact of the temporary change and any extension thereafter would be contrary to the edict in the Emergency Proclamations that establishes agriculture as an essential activity. An extended reduction in barge service at this critical time may result in severe adverse impact to the economic viability of agricultural operations and availability of locally grown food, especially to vulnerable residents who are already in distress because of the pandemic.

The Department recently had discussions with some agricultural operators and organizations directly affected by the YB temporary emergency schedule change. There is concern that if livestock ranchers cannot ship cattle under the current sailing schedule from Molokai, and likewise vegetable farmers cannot ship fresh produce under the current sailing schedule from Hilo, this will result in undue animal welfare issues and degrading of perishable fresh produce issues during a time of emergency where food supply is essential to public health and welfare.

To reiterate, the Department of Agriculture strongly recommends that the PUC require and consider more information and public input on the impact of the 30-day temporary changes and to its barge sailing schedule on the agricultural operations on the islands of Molokai, Maui, and Hilo, Hawaii. The Department stands in strong support of Hawaii's agricultural operators and their fundamental role in increasing Hawaii's food self-sufficiency and food security for residents and visitors alike.

Sincerely,



Phyllis Shimabukuro-Geiser
Chairperson, Board of Agriculture

c: The Honorable David Ige, Governor
The Honorable Mike Gabbard, Senator
The Honorable Richard Creagan, Representative
Hawaii Farm Bureau Federation
Hawaii Farmers Union United
Hawaii Cattlemen's Council, Inc.

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