



Board of Land and Natural Resources
May 8, 2026
9 a.m. DLNR Boardroom
Kalanimoku Building
Honolulu, Hawaii 96813

**Testimony in Support of Agenda Item C.3. To Initiate Rulemaking
on the Amendments to Chapter 13-124, Hawaii Administrative Rules**

Aloha Chairperson Kanaka'ole and Members of the Board of Land and Natural Resources,

The Coordinating Group on Alien Pest Species (CGAPS) supports the request to initiate rulemaking on the amendments to chapter 13-124, Hawaii Administrative Rules (HAR).

CGAPS is a voluntary partnership of federal and state agencies and non-governmental organizations whose goal is to protect Hawaii from invasive species. Consistent with this goal, we support the amendments to chapter 13-124 HAR, particularly those related to injurious wildlife species.

At the federal level, the U.S. Fish and Wildlife Service maintains a list of injurious wildlife species (18 USC 42; 50 CFR part 16), which is completely separate from the lists of pests and other species maintained by the U.S. Department of Agriculture. This structure allows each agency to address harmful species in ways consistent with its mission and statutory duties. Similarly, the Department of Land and Natural Resources (DLNR) has the duty and authority to protect the State's wildlife and wildlife resources (HRS 183D-2), a duty and authority separate from any authority granted to any other State agency. Maintaining an up-to-date list of injurious wildlife species enables DLNR to fulfill this duty by managing injurious wildlife species within the State.

The proposed list of injurious wildlife species includes the addition of certain species identified on the Hawaii Prevention Priority Species List.¹ The creation of that List was a multi-agency effort to document species that are not-known-to-occur (NKO) in Hawaii, are likely to arrive, have a pathway of arriving, and that are likely to be invasive if introduced. DLNR has selected species from that List that are particularly likely to impact wildlife and wildlife resources. We strongly support the inclusion of these species on the injurious wildlife list.

¹ <https://dlnr.hawaii.gov/hisc/files/2024/09/Hawai'i-Prevention-Priority-Species-List-APRIL-2024.pdf>

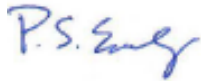
We appreciate that preparing the proposed amendments to chapter 13-124 HAR is a significant task, and we are grateful for DLNR's efforts to keep its administrative rules, including the list of injurious wildlife species, up to date to protect the State's wildlife and wildlife resources from invasive species.

Thank you for the opportunity to provide this testimony and for all your efforts to prevent the introduction and spread of invasive species in Hawaii.

Aloha,

A handwritten signature in blue ink, appearing to read "C. Martin".

Christy Martin
CGAPS Program Manager

A handwritten signature in blue ink, appearing to read "P.S. Easley".

Stephanie Easley
CGAPS Legal Fellow