

**SB 1259**



## DEPARTMENT OF THE NAVY

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NAVY REGION HAWAII  
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### SENATE COMMITTEE ON AGRICULTURE AND THE ENVIRONMENT SENATE COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS

#### Testimony on Senate Bill No. 1259, Related to Underground Storage Tanks

Hearing Date and Time: February 8, 2017, 1:20 P.M., Room 224

Testimony on behalf of Navy Region Hawaii

Good afternoon, Chair Gabbard, Chair Nishihara, Vice Chairs, and Senators,

I am Captain Richard Hayes of the United States Navy. I am the Commanding Officer of Naval Facilities Engineering Command (NAVFAC), Hawaii, and also the Regional Engineer for Navy Region Hawaii. With me today is Mr. Mark Manfredi, Project Coordinator for the Red Hill Facility, and personnel from the Navy Supply Command, Navy Region Hawaii, NAVFAC, and the Defense Logistics Agency.

Thank you for the opportunity to speak here today. I am testifying on behalf of the U. S. Navy and Department of Defense on Hawaii Senate Bill 1259. This bill appears to primarily target the Department of Defense (DoD) Red Hill Bulk Fuel Storage Facility. The Environmental Protection Agency (EPA) and State of Hawaii Department of Health (DOH) regulates the Red Hill facility under a written agreement signed in September 2015 known as the Administrative Order on Consent (AOC). My testimony consists of four points: drinking water safety, fuel tank integrity, the AOC process and Red Hill's importance.

**Drinking water from Red Hill is safe.** Past and current validated testing confirms, and all parties agree, that drinking water from the Red Hill shaft is safe. A third party lab validates current testing. The Navy works with regulators at the EPA and DOH, and with other stakeholders to ensure it remains safe. Regulators review monitoring data and test results to ensure our drinking water remains safe. Testing records confirm that the drinking water meets or exceeds all requirements. Since the fuel release in 2014, the Navy increased the frequency that it tests drinking and groundwater and added additional monitoring wells; installing the newest operating wells in October 2016.

The Navy installed the first groundwater monitoring well in 2002. In 2008, the Navy developed and implemented a DOH approved Groundwater Protection Plan that incorporated the existing groundwater monitoring wells. Today, there are 12 groundwater monitoring sites around the Red Hill facility to detect any possible migration toward the drinking water source by collecting samples using procedures developed with DOH. We are planning to install two additional monitoring wells. The Navy provides the complete suite of studies, analytical data, and technical reports to the regulatory

agencies and makes the data part of the administrative record for public review. The Navy updated the plan in 2009, 2010, and again in 2014, each time with DOH approval. The Navy is consulting with the DOH and EPA to continually evolve and update the Groundwater Protection Plan.

We entirely agree that protecting the drinking water in Hawaii is an unquestioned, non-negotiable imperative. We are meeting this requirement through the Administrative Order on Consent (AOC) with our regulators, the DOH and EPA. The AOC includes a formal process that solicits input from outside subject matter experts.

**Red Hill tanks are not leaking.** The Navy began a more stringent leak detection test at Red Hill in 2008 for two tanks, and then tested the remaining operational tanks in 2009. This new test, a tank tightness test, is a procedure that determines if an underground storage tank leaks. Operators precisely fill the tank and measure pressure over time to ensure the tank is not leaking. Planned to be a biennial test, the Navy increased tank tightness testing frequency to annually in 2015. The AOC and its Statement of Work (SOW) incorporated this test. The Navy completed the Red Hill annual tank tightness test last week. All operating tanks continue to pass leak detection criteria of Title 40 of the U.S. Code of Federal Regulations. **Red Hill fuel tanks are not leaking.**

In 2014, contractors completed a multi-year service inspection and planned maintenance on fuel tank 5, which was not in service. There were three major failures that resulted in the fuel release, poor workmanship and lack of quality control by the contractor, poor quality assurance oversight by the Navy, and the operators lack of procedural compliance. The Navy took appropriate and corrective actions to fix the contractor's issues, lack of quality control and procedural failures. **No other tanks were involved in the 2014 fuel release.** The Navy reiterates for the record, that the official estimation for the 2014 fuel release from Red Hill Tank 5, based on best accounting practices, is approximately 27,000 gallons, not 40,000 gallons as the bill indicates.

In his most recent letter to stakeholders, Rear Adm. John Fuller, commander, Navy Region Hawaii, said, "To address fuel tank integrity, the Navy employs a continuing process that monitors the tanks with testing and inspections and sustains them with planned preventative as well as corrective maintenance, as needed. We take to heart and apply the lessons learned and process improvements we developed after the fuel release from Tank 5 in 2014. While we have a world class system today, the Navy will continue to improve monitoring systems under AOC section 4."

Since 2006, Federal Government spent over \$200 million on improvements: installed groundwater and soil vapor monitoring systems; structurally reinforced and renovated the tunnels and passageways; and improved ventilation, tank interiors, oil tight door, fire protection, pipelines, and the Red Hill drinking water shaft security. This is in addition to our continued tank testing and inspections.

**The AOC process is working and on-track.** The AOC focus is maintaining our safe drinking water. The Navy is committed to the AOC along with the regulators, the EPA and DOH. The AOC sets hard deadlines for deliverables and is enforceable by the EPA and DOH. The AOC solicits and addresses external subject matter opinions. To date, the EPA, DOH, DLA, the Navy, and other stakeholders address tank inspection, repair and maintenance; tank upgrade alternatives; release detection/tank tightness testing; corrosion testing; investigation and remediation; groundwater protection; as well as a risk and vulnerability assessment. The AOC creates legally enforceable decisions which are implemented using the federal procurement processes and, where necessary, the military construction process. Some progress to date:

- Completed Section 6 and 7 (ground water assessment and modeling) analysis and EPA and DOH approved it.
- Completed the Current Fuel Release Monitoring Systems Report (Section 4.3) and EPA approved it.
- Completed the Corrosion and Metal Fatigue Practices Report (Section 5.2) and the EPA and DOH approved it.
- Completed the Section 6 and 7 (Monitoring Well Installation Plan).
- Completed the Sampling and Analysis Plan.
- Submitted the Section 2 tank inspection, maintenance, and repair report.
- Submitted the Section 3 tank upgrade alternatives scope of work.
- Scoping the New Release Detection Alternatives Report (Section 4.6).
- Scoping the Destructive Testing effort.

The tank upgrade alternative that the AOC is addressing is complex and unique. The AOC by the end of this year will complete its tank upgrade alternatives evaluation, to include double walled solutions.

SB 1259 would mandate double wall tank modifications; a design that has neither been tested nor proven on this scale, particularly within the unverified timeline set by the bill. EPA Headquarters deliberated for over four years with industry and DoD on changes to underground storage tank regulations. The EPA and DOH recognize that double walling “could increase the risk of future failures.” The AOC’s step-by-step approach enables a full technical evaluation of all alternatives to verify the best solution.

The National Defense Authorization Act (NDAA) of 2016 requires the Navy and DLA to brief the House Armed Services Committee on its Tank Upgrade Alternative recommendation upon final review. We respectfully remind all stakeholders that there are no “off the shelf” solutions to many of these requirements. Assessing the best available practicable technology requires consideration of alternatives – including some untested alternatives – as well as considering public input. We remain committed to the AOC process, which focuses on achieving the best solutions for Red Hill.

**The AOC is working; it is enforceable and will oversee the development and implementation of upgrades to the Red Hill fuel facility.**

**The Red Hill facility is of vital strategic importance** to our nation and US Pacific Command. Red Hill's importance hasn't changed in the past two years; if anything its importance has increased. Two years ago when this committee was considering SB 1168, Brigadier General O'Neil, Director of Logistics, addressing PACOM's command of Air Force, Marines, Army, and Navy forces, testified (paraphrasing for clarity only):

The Red Hill facility holds a significant percentage of petroleum war reserves required to defend national security interest in the Pacific region. It supports all US military forces stationed in and transiting through Hawaii via it's hardened, underground, cyber-protected, gravity feed system to Joint Base Pearl Harbor-Hickam. It supports the Hawaii Army and Air National Guard and is capable of defense support to civil authorities should circumstances dictate. There is no comparable US owned facility anywhere from India to mainland USA.

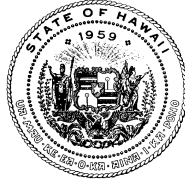
USPACOM remains committed to operating environmentally sound facilities, demonstrated through a trained workforce and continued financial investment that has improved safety, accountability, detection and monitoring at Red Hill.

Red Hill has been vital to our nation since construction; it is vital today; and will remain vital for the foreseeable future.

The DoD asks the Legislature to defer this bill to allow DOH to continue its work with the EPA and the Navy. We remain committed to protecting drinking water in Hawaii as an unquestioned, non-negotiable requirement. The AOC, which describes tasks that the Navy will complete within certain time constraints, is dedicated to meeting that requirement. This legally enforceable process provides the roadmap for the Red Hill facility with enhanced oversight and approval roles for DOH and EPA with expert resources beyond what this proposed bill would otherwise authorize.

In summary, your military in Hawaii and throughout the Pacific needs continuous and uninterrupted access to large volume, secure and sustainable fuel storage facilities. The Red Hill facility provides fuel to support countless contingency operations in the Pacific, and is essential to safeguard our national interests and support humanitarian missions overseas. The forward presence provided by your military builds international cooperation, maintains regional stability, and ensures maritime security, including the free flow of commerce to Hawaii, the mainland, and throughout the Indo-Asia-Pacific region. Red Hill will continue to operate safely with the process already established in the AOC. We respectfully request your support to defer action on this bill to ensure that the State Department of Health, the EPA, DLA, the Navy, and other stakeholders have sufficient time to complete our collaborative Administrative Order on Consent.

Thank you for the opportunity to testify today.



**STATE OF HAWAII**  
**DEPARTMENT OF HEALTH**  
P. O. Box 3378  
Honolulu, HI 96801-3378  
doh.testimony@doh.hawaii.gov

**Testimony in OPPOSITION to SB 1259**  
**RELATING TO UNDERGROUND STORAGE TANKS**

SENATOR MIKE GABBARD, CHAIR  
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

SENATOR CLARENCE K. NISHIHARA, CHAIR  
SENATE COMMITTEE ON PUBLIC SAFETY, INTERGOVERNMENTAL, AND  
MILITARY AFFAIRS

Hearing Date: February 8, 2017  
Time: 1:20pm

Room Number: 224

1 **Fiscal Implications:** No funding is provided to implement this measure.

2 **Department Testimony:** The Department respectfully opposes this measure, which amongst its  
3 suggested provisions requires existing field-constructed underground storage tanks, with storage  
4 capacities greater than fifty thousand gallons, to upgrade with secondary containment by  
5 July 1, 2027 or be taken out-of-service and permanently closed by July 1, 2030.

6  
7 The measure's intended purpose is to protect the state's underground drinking water  
8 sources and surrounding environment by requiring the Department to adopt rules for  
9 underground storage tanks and tank systems that conform with recent revisions to federal  
10 regulations. However, it also includes additional requirements, for certain field-constructed  
11 underground storage tanks, that could result in the shut-down of the Red Hill bulk fuel storage  
12 facility.

13  
14 The Department's top priority is the protection of public health and the environment.  
15 Hence, in response to the January 2014 release of 27,000 gallons of fuel from Red Hill, the  
16 Department along with the U.S. Environmental Protection Agency (EPA) evaluated several  
17 regulatory enforcement actions. The agencies recognized that upgrading the Red Hill facility  
18 would be technically complex and an expensive task. In brief, the Department and EPA, through  
19 this deliberative evaluation process, decided to issue an Administrative Order on  
20 Consent (AOC). The AOC was agreed to on September 28, 2015 by all parties involved.

21  
22 The Department believes that the AOC remains the best and most comprehensive path  
23 forward to protect our drinking water resources while requiring the Navy and Defense Logistics

1 Agency (DLA) to improve their facility in order to continue to operate their fuel storage  
2 activities.

3  
4 The Department agrees that in order for the Red Hill facility to operate in a manner that is  
5 most protective of the environment, we must evaluate and implement operational improvements  
6 and tank upgrades. Secondary containment is currently being considered and MAY be the best  
7 tank upgrade option.

8  
9 The AOC can be considered as targeted rulemaking as it requires the Navy to address  
10 above and beyond the new federal requirements. Under the AOC, the Navy is completing a tank  
11 upgrade alternative report and is also working on procedures to improve inspection, repair and  
12 maintenance, release detection, corrosion and fatigue, groundwater protection, and risk and  
13 vulnerability.

14  
15 For over a year, engineers, geologists, environmental scientists, and other technical  
16 experts from the Navy, EPA, Department of Land and Natural Resources, U.S. Geological  
17 Service, and Board of Water Supply (BWS) have participated in the implementation of the AOC.  
18 Due to unprecedented and massive scale of this project, rushing to implement secondary  
19 containment may actually not result in the best practicable solution.

20  
21 The current evaluation of tank upgrade alternatives has included designs that will  
22 improve integrity, reliability and provide a credible means of leak detection and/or fuel  
23 containment. Navy consultants initially identified over 25 upgrade concepts grouped into three  
24 categories: tank interior upgrades, secondary containment with release detection, and tank  
25 exterior upgrades.

26  
27 Fourteen technologies were screened based on the following parameters:  
28 Feasibility (can it be constructed in the field at Red Hill)  
29 Testability (will it hold product)  
30 Inspectable  
31 Repairable

32  
33 The AOC agencies selected six upgrade alternatives that are currently being evaluated  
34 using a ranking system containing nearly 50 attributes (considerations).

35 The AOC will allow the Department to continue to have unprecedented access to the  
36 technical experts at EPA, the Navy and DLA, and the many contractors employed by them, while  
37 the parties determine the best technology to apply to this truly one-of-a-kind tank facility. Under  
38 this agreement, EPA and the Department have the procedural mechanisms to ensure that the  
39 Navy and DLA implement the improvements in a timely fashion while also ensuring that the  
40 improvements made are those that are the most protective of drinking water sources in the long

1 term. Once it has been determined what the right upgrades are for the facility, the Navy will  
2 install that technology as soon as reasonably possible.

3 We are making sure that the Navy meets every deadline set in the AOC. The Tank  
4 Upgrade Alternative (TUA) is only one evaluation of the AOC, but it is an important one.

5  
6 This highly anticipated final version of TUA is scheduled for late this year. Subsequently,  
7 the Department and EPA will select the Best Available Practicable Technology (BAPT) as the  
8 first required upgrade that the Navy must implement, in order to continue to operate their tanks.  
9 This is a critical period for the AOC parties to determine what BAPT alternatives are considered  
10 and selected.

11  
12 In summary, the water is safe to drink. There is no evidence of fuel in any of the BWS  
13 drinking water wells.

14  
15 Most of the residual fuel levels in the groundwater remains within the Navy's Red Hill  
16 property.

17  
18 The Department will be happy to brief the Legislature regarding this feasibility report and  
19 what BAPT solutions are selected.

20  
21 Thank you for the opportunity to testify on this measure.  
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# BOARD OF WATER SUPPLY

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
February 8, 2017

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Deputy Manager and Chief Engineer 

The Honorable Mike Gabbard, Chair and Gil Riviere, Vice Chair  
and Members  
Committee on Agriculture and Environment

and

The Honorable Clarence Nishihara, Chair and Glenn Wakai, Vice Chair  
and Members  
Committee on Public Safety, Intergovernmental and Military Affairs  
State Senate  
Hawaii State Capitol, Room 224  
415 South Beretania Street  
Honolulu, Hawaii 96813

Dear Chairs Gabbard and Nishihara, Vice Chairs Riviere and Wakai and Members:

SUBJECT: Senate Bill 1259: Related to Underground Storage

We strongly support Senate Bill 1259. This bill will insure our environment and underground sources of drinking water are protected from the impacts of leaking underground petroleum fuel tank systems through the application of standardized rules, requirements and best practices that uniformly applies to all systems regardless of size and construction type. To clarify the bill's implementation timeframe, we recommend adding the following sentence to Section 3 of the bill:

*The department of health shall complete the revisions to chapter 11-281, Hawaii Administrative Rules by September 1, 2018.*

Existing Hawaii state regulations needs to require presently unregulated field-constructed underground storage tanks (USTs) to meet the same requirements that must be met by all other owners of underground tanks. This bill addresses this imbalance and will significantly improve the condition and protection of the groundwater underneath the Red Hill Bulk Fuel Facility which is already exposed to leaks and contaminated with petroleum fuel contaminants. Red Hill is the state's largest field-constructed UST and the groundwater underneath the facility is part of the same aquifer that is currently used as a major source of drinking water to the residents of Oahu and the Navy. The need to preserve and protect groundwater quality and quantity now and into the future outweighs continuance of operating unregulated field-constructed USTs.

Thank you for the opportunity to testify.

Very truly yours,



ERNEST Y. W. LAU, P.E.  
Manager and Chief Engineer



**Testimony to the Senate Committees on Agriculture and Environment &  
Public Safety, Intergovernmental, and Military Affairs  
Wednesday, February 8, 2017 at 1:20 P.M.  
Conference Room 224, State Capitol**

**RE: SENATE BILL 1259 RELATING TO UNDERGROUND STORAGE TANKS**

Chair Gabbard and Nishihara, Vice Chairs Riviere and Wakai, and Members of the Committee:

The Chamber of Commerce Hawaii ("The Chamber") **opposes** SB 1259, which requires the Department of Health to adopt rules for underground storage tanks and tank systems to conform with certain federal regulations and include additional requirements for field-constructed underground storage tanks and tank systems.

In recognizing how critical the U.S. military presence is to Hawaii's economy, the Chamber underscores that the Red Hill fuel facility is vital to military readiness as it supports all Hawaii-based military actions and a significant share of many more in the Asia-Pacific region.

It is the understanding of the Chamber that this legislation threatens the U.S. military's ability to respond to crisis in the region, whether it is conflict or humanitarian aid/disaster relief, due to the fact that the requirements proposed in this bill are not feasible. The military's ability to remain "ready to respond" is essential for preserving the military's presence in the State and protecting our second largest industry. If the current bill is passed it is likely that the Red Hill facility will close, and we do not know what such a closure will have.

Thank you for the opportunity to testify.



**Conservation Council  
for Hawai'i**

*Hawai'i's voice for wildlife*

*Kō Hawai'i leo no nā holoholona lōhiu*



Testimony Submitted to the Senate Committee on Agriculture and Environment  
And Senate Committee on Public Safety, Intergovernmental, and Military Affairs  
By the Conservation Council for Hawai'i  
Hearing: Wednesday, February 8, 2017 1:20 pm  
Room 224

### Support for SB 1259 Relating to Underground Storage Tanks

Chair Gabbard, Chair Nishihara, Vice Chair Riviere, Vice Chair Wakai, and Members of the Committees,

Aloha. The Conservation Council for Hawai'i supports SB 1259, which requires the Department of Health to adopt rules for underground storage tanks and tank systems to conform with certain federal regulations and that include additional requirements for field-constructed underground storage tanks and tank systems.

The U.S. Navy's fuel underground storage tanks at Red Hill on O'ahu are antiquated and no longer functional. Fuel is leaking, and it is only a matter of time before it reaches our potable water aquifer. The tanks should be replaced using the best technology to ensure safety to human health and the environment, including: (1) double-lining to prevent fuel releases into the environment and (2) protection to minimize erosion of steel underground. The Navy and the State must also do a much better job monitoring the tanks.

Please protect our drinking water and the environment by passing SB 1259. Mahalo nui loa for the opportunity to testify.

*Marjorie Ziegler*

Marjorie Ziegler

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President: Wayne Tanaka | Vice President: Koalani Kaulukukui | Secretary: Rachel Sprague

Treasurer: Les Welsh | Director: Anne Walton

Executive Director: Marjorie Ziegler | Administrator: Jonnetta Peters





Board of Directors: **Senate Committee on Agriculture & Environment**  
**Senate Committee on Commerce, Consumer Protection & Health**

Gary L. Hooser **Hawai'i Alliance for Progressive Action strongly supports: SB 1259**

President Aloha Chair Gabbard, Chair Nishihara, and Committee Members,

Andrea N. Brower  
Joshua D. I. Mori  
Co-Vice Presidents My name is Anne Frederick and I am the Executive Director for the Hawai'i Alliance for Progressive Action (HAPA). HAPA is a statewide environmental, social and economic justice organization. HAPA engages over 10,000 local residents annually through our work.

Ikaika M. Hussey  
Treasurer From October through December of 2016 HAPA and several of our partners held a series of input gathering forums across the islands called the People's Congress. Over 800 people attended forums on Kaua'i, O'ahu, Maui and Hawai'i Island to discuss the most pressing issues facing their communities. The quality and security of our drinking water was one of the key issues raised.

Bianca K. Isaki  
Secretary I am writing you today in strong support for SB 1259, requiring Red Hill and other large-scale, antiquated field-constructed fuel tanks in Hawai'i to comply with federal requirements for standard tanks, including:

- Paul Achitoff
- Secondary containment and highly sensitive leak detection to protect against fuel leaks
  - Corrosion protection to minimize erosion of steel underground
  - Dramatically increase monitoring frequency and thoroughness

Malia K. Chun  
Bart E. Dame  
Laura Harrelson  
Kim Coco Iwamoto  
Katie McMillan  
Walter Ritte Jr.  
Karen Shishido

Freshwater is Hawai'i's most precious resource and it must be protected in the highest regard. The tanks at the Red Hill Bulk Fuel Storage Facility put our water quality at risk and threaten our public health. The facility was constructed in the 1940s and is the largest field-constructed underground storage tank system in the state, storing up to 187 million gallons of fuel just 100 feet above O'ahu's primary aquifer that supplies drinking water to over 600,000 residents from Hālawā to Hawai'i Kai.

Leslie Malu Shizue Miki

Kekaulike Prosper Tomich

Cade Watanabe

*The Hawai'i Alliance for Progressive Action (HAPA) is a public non-profit organization under Section 501(c)(3) of the Internal Revenue Code. HAPA's mission is to catalyze community empowerment and systemic change towards valuing 'aina (environment) and people ahead of corporate profit.*



Because the tanks are field constructed, the Red Hill facility is exempt from many state and federal regulations on underground storage tanks. This exemption is detrimental to human health and the environment and should not exist for this facility, especially because of its location—the opposite should hold true, stricter regulations should be in place to protect our drinking water resource.

I believe these tanks should be brought into to existing regulations because of the facility's long history of leaking fuel into the surrounding environment and its likelihood to continue to do so. Since the last major spill in 2014, the U.S. Navy has not done enough or acted with urgency to protect O'ahu's primary aquifer, further steps, such as implementing these stricter regulations, must be taken in the immediate future.

I urge you to pass SB 1259.

Thank you very much for this opportunity to provide testimony on this important issue.

Mahalo,

Anne Frederick  
Executive Director  
Hawai'i Alliance for Progressive Action



# SIERRA CLUB OF HAWAII

**MĀLAMA I KA HONUA. *Cherish the Earth.***

**JOINT SENATE COMMITTEE ON**

**AGRICULTURE AND ENVIRONMENT**

**AND PUBLIC SAFETY, INTERGOVERNMENTAL, AND MILITARY AFFAIRS**

Wednesday, February 8, 2017 1:20 PM Room 224

**In SUPPORT SB 1259** Underground Storage Tanks

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Aloha Chairman Gabbard, Chairman Nishihara, and members of the joint AEN/PSM Committees,

The Sierra Club of Hawai'i strongly **SUPPORTS SB 1259**, which aims to protect the State's groundwater sources and surrounding environment by upgrading the standards for underground storage tanks (UST). This bill addresses concerns about USTs that are field-constructed by requiring the Department of Health adopt rules that conform with the July 2015 revisions to U.S. EPA regulations (Code of Federal Regulations title 40, part 280), as well as implement secondary containment and additional monitoring efforts to prevent the release of fuel and other hazardous substances into the environment.

Under current law, field-constructed USTs are exempt from many of the requirements designed to protect public health and the environment. There are over 38 military facilities throughout the Hawaiian Islands that include field-constructed underground fuel storage tanks; many of them built around World War II.<sup>1</sup>

Of particular concern is the Red Hill bulk fuel storage facility. This is the largest field-constructed underground storage tank system in Hawai'i, storing up to 250 million gallons of jet fuel.<sup>2</sup> Built in the 1940's, this antique facility has suffered numerous leaks.<sup>3</sup> Most recently in January 2014, tank 5 leaked 27,000 gallons of jet fuel into the surrounding environment only 20 days after the tank passed inspection.<sup>4</sup>

The Red Hill facility is located a mere 100 feet above from O'ahu's primary groundwater aquifer. This aquifer provides 600,000 residents from Hālawā to Hawai'i Kai with drinking water.<sup>5</sup> Since 2005, U.S. Navy tests indicate petroleum contaminants in the groundwater underneath and near the Red Hill tanks.<sup>6</sup> Independent toxicology tests completed for the Board of Water Supply show continued petroleum contamination in the

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<sup>1</sup> Red Hill Task Force report to the 2015 Legislature, Appendix E,  
[http://rbhawaii.info/reports/legprpts/doh/2015/scr73\\_hd1\\_14.pdf](http://rbhawaii.info/reports/legprpts/doh/2015/scr73_hd1_14.pdf)

<sup>2</sup> Red Hill Task Force Report to the 2015 Legislature, page 1  
[http://rbhawaii.info/reports/legprpts/doh/2015/scr73\\_hd1\\_14.pdf](http://rbhawaii.info/reports/legprpts/doh/2015/scr73_hd1_14.pdf)

<sup>3</sup> Navy monitoring reports, compiled by Honolulu Board of Water Supply,  
<http://www.boardofwatersupply.com/bws/media/files/red-hill-briefing-public-meeting-moanalua-middle-school-2016-08-15.pdf>

<sup>4</sup> Red Hill Task Force Report to the 2015 Legislature, page 3  
[http://rbhawaii.info/reports/legprpts/doh/2015/scr73\\_hd1\\_14.pdf](http://rbhawaii.info/reports/legprpts/doh/2015/scr73_hd1_14.pdf)

<sup>5</sup> Red Hill Task Force Report to the 2015 Legislature, page  
[http://rbhawaii.info/reports/legprpts/doh/2015/scr73\\_hd1\\_14.pdf](http://rbhawaii.info/reports/legprpts/doh/2015/scr73_hd1_14.pdf)

<sup>6</sup> Navy monitoring reports, compiled by Honolulu Board of Water Supply, page 10  
<http://www.boardofwatersupply.com/bws/media/files/red-hill-briefing-public-meeting-moanalua-middle-school-2016-08-15.pdf>

groundwater as of July 2016.<sup>7</sup>

In 2015, the Navy negotiated an administrative process (known as the Administration Order on Consent (AOC)) with the U.S. EPA and the Department of Health to “address past fuel releases and minimize the likelihood of future releases”.<sup>8</sup> The AOC outlines a 20-year evaluation process, but provides no real actions for remediation or leak prevention.<sup>9</sup> Three years since the last spill, the Navy can demonstrate little progress towards cleaning up existing contamination or guaranteeing against future leaks. Because the AOC has proven insufficient to guarantee the future safety of our drinking water, the Sierra Club strongly urges this Committee to pass SB 1259.

The State has a public trust obligation to protect and preserve the water resources of Hawai‘i, as iterated in Article XI, § 7 of the State’s Constitution. SB1259 helps the Department of Health deliver on its constitutional obligations to protect our groundwater supplies from contamination. Specifically, this bill requires:

- Secondary containment for all field-constructed fuel storage tanks by July 2027. This is a minimum requirement that all modern gas stations currently follow.
- Highly sensitive leak detection systems installed by July 2019, and
- Corrosion protection to prevent weakening of the steel walls, which are now well over 70 years old. Cathodic protection is also a minimum expectation of all gas stations.

Federal law specifically preserves state authority to impose stricter regulations on USTs. In adopting its hazardous waste statute, Congress specifically empowered states to design more stringent requirements (42 U.S.C. §6929) that are applied to all facilities including those operated by the U.S. military (42 U.S.C. §6961). At least nine other states have stricter requirements for underground storage tank facilities.<sup>10</sup>

If field-constructed fuel tanks cannot be upgraded to meet modern-day standards, then the facilities are antiquated and should be retired. Please do not wait until our water is irreversibly contaminated to take action.

We strongly urge the Legislature to pass SB1259 to ensure that all field-constructed tanks in our islands are as secure and safe as possible. Passing this bill ensures our groundwater is better protected for future generations.

Thank you very much for this opportunity to provide testimony on this important issue.

Mahalo,



Marti Townsend  
Director

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<sup>7</sup> Honolulu Board of Water Supply, Red Hill Toxicology Report, December 2016  
<http://www.boardofwatersupply.com/bws/media/files/red-hill-toxicology-study-results-summary-and-faq-2016-12-01.pdf>

<sup>8</sup> <http://health.hawaii.gov/shwb/files/2015/09/Final-Red-Hill-FAQ-29SEP15.pdf>

<sup>9</sup> <https://www.regulations.gov/document?D=EPA-R09-UST-2015-0441-0569>

<sup>10</sup> <https://www.epa.gov/sites/production/files/2016-11/documents/ca-16-34.pdf>



SENATOR MIKE GABBARD, CHAIR  
SENATOR GIL RIVIERE, VICE CHAIR  
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

SENATOR CLARENCE K. NISHIHARA, CHAIR  
SENATOR GLENN WAKAI, VICE CHAIR  
SENATE COMMITTEE ON PUBLIC SAFETY,  
INTERGOVERNMENTAL, AND MILITARY AFFAIRS

TESTIMONY IN SUPPORT OF SENATE BILL NO. 1259  
RELATING TO UNDERGROUND STORAGE TANKS

February 8, 2017, 1:20 p.m.  
Conference Room 224

Good afternoon Chairs Gabbard and Nishihara, Vice Chairs Riviere and Wakai, and members of the committees:

My name is David Lane Henkin, and I am an attorney with Earthjustice. We appreciate the opportunity to testify in support of Senate Bill 1259, which seeks to ensure that Hawai'i's vital and irreplaceable drinking water supplies are adequately protected from contamination due to leaking underground storage tanks. While Earthjustice defers to those with the requisite technical expertise to speak to the precise standards that are necessary to protect our water supplies, we strongly support the intent of this measure to respond to deeply felt public concerns about the risks of contamination from the Red Hill bulk fuel storage facility and other leaking underground storage tanks.

The federal Resource Conservation and Recovery Act (RCRA) recognizes the vital role that state regulation plays in ensuring that local communities are adequately protected from contamination threats. RCRA expressly authorizes the State to impose more stringent standards than federal regulations. See 42 U.S.C. § 6929. It further makes clear that federal agencies like the Navy are "subject to, and [must] comply with" all "State ... and local requirements, both substantive and procedural[,] ... in the same manner, and to the same extent, as any person is subject to such requirements." 42 U.S.C. § 6961(a).

We appreciate the opportunity to offer this testimony in support of SB 1259, and urge you to take the steps necessary to protect our water supplies from contamination.



**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Sunday, February 5, 2017 2:42 PM  
**To:** AEN Testimony  
**Cc:** cchaudron08@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/5/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Camila Chaudron	Individual	Support	No

Comments: Aloha. My name is Camila Chaudron, and I live in the Manoa/Makiki area. I support this measure because clean drinking water is essential to survival, and we need to do everything we can to protect Hawai'i's aquifers right now. The tanks at the Red Hill Bulk Fuel Storage Facility put our water quality at risk and threaten our public health. The facility was constructed in the 1940s and is the largest field-constructed underground storage tank system in the state, storing up to 187 million gallons of fuel just 100 feet above O'ahu's primary aquifer that supplies drinking water to over 600,000 residents from Hālawā to Hawai'i Kai. The current situation at Red Hill is detrimental to human health and the environment and exceptions should not exist for this facility, especially because of its location— instead, we need stricter regulations to protect our drinking water resource. The U.S. Navy has not done enough or acted with urgency to protect O'ahu's primary aquifer, further steps, such as implementing these stricter regulations, must be taken in the immediate future. Mahalo for supporting this bill.

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Saturday, February 4, 2017 7:34 PM  
**To:** AEN Testimony  
**Cc:** ahuntemer@aol.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/4/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Angela Huntemer	Individual	Support	No

Comments: Aloha Committee Chair and Members, I support SB1259 because we ABSOLUTELY need regulations to make sure that the disaster at Red Hill does not happen again. These regulation need to apply to everyone - Military and non-Military. It is a real disaster we have on our hands at Red Hill. Please support SB1259. Thank you.

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Saturday, February 4, 2017 1:24 PM  
**To:** AEN Testimony  
**Cc:** evernw@aol.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/4/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Evern Williams	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Friday, February 3, 2017 9:46 PM  
**To:** AEN Testimony  
**Cc:** Burdick808@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/3/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Alan B Burdick	Individual	Support	Yes

Comments: Especially as a resident of Aiea, I strongly support this measure. I have read it, and basically it simply requires the State to do its job and adopt regulations consistent with new federal regulations to improve monitoring and safety. What could possibly be objectionable about that? I am frankly surprised and dismayed that the relevant State agencies have not already adopted new regulations on their own and seem to need a forceful push from the Legislature in the form of a bill. Please pass this bill!

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Friday, February 3, 2017 3:55 PM  
**To:** AEN Testimony  
**Cc:** mendezj@hawaii.edu  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/3/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Javier Mendez-Alvarez	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Thursday, February 2, 2017 10:16 PM  
**To:** AEN Testimony  
**Cc:** erinrutherford815@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/2/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Erin Rutherford	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, January 30, 2017 8:40 PM  
**To:** AEN Testimony  
**Cc:** jamesjtz@aol.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 1/30/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
James Gauer	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, January 30, 2017 7:26 PM  
**To:** AEN Testimony  
**Cc:** pulermq@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 1/30/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
RuthMarie Quirk	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, February 6, 2017 1:31 PM  
**To:** AEN Testimony  
**Cc:** JAMESLOGUE412@GMAIL.COM  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/6/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
James Logue	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, February 6, 2017 11:03 AM  
**To:** AEN Testimony  
**Cc:** john.from.stl@alumni.stanford.edu  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/6/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
John Maurer	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, February 6, 2017 9:16 AM  
**To:** AEN Testimony  
**Cc:** Bmcd63@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/6/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Elizabeth McDermott	Individual	Support	No

Comments: It is insanity to gamble with our islands drinking water and public health by allowing the Navy a 20 year time table to address this issue. There should be no exemption from responsibility for protecting our community. This is a disaster waiting to happen. No more delays. We need our local public health officials and Board of Water supply to be full partners in making recommendations to repair or remove these tanks. Fix them now!

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 6:37 AM  
**To:** AEN Testimony  
**Cc:** Tulsigreenlee@icloud.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Tulsi Greenlee	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Monday, February 6, 2017 8:12 AM  
**To:** AEN Testimony  
**Cc:** lynneronderko@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/6/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Lynn Onderko	Individual	Support	No

Comments: There is nothing more important than the protection of our clean water. This is a common sense bill that should be passed with the health and well being of all Hawaii's citizens at the forefront of your consideration. Mahalo.

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 4:41 PM  
**To:** AEN Testimony  
**Cc:** gifts9954@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Susan Vickery	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 2:32 PM  
**To:** AEN Testimony  
**Cc:** spawaikiki@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
dennis boyd miller	Individual	Support	No

Comments: Dear Senators, I'm Dennis Miller, a Waikiki resident. Regarding SB1259 Committee AEN/PSM Room 224 Feb 8, 2017 I'm writing to urge you to pass this bill. Our water supply deserves your protection. Please act now before it is too late. Thank you, Dennis Miller

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 1:29 PM  
**To:** AEN Testimony  
**Cc:** lucialyou@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Lucia You	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 12:34 PM  
**To:** AEN Testimony  
**Cc:** forestaf@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Forest Frizzell	Individual	Support	No

Comments: Please safeguard our water and take action to clean up all spills and prevent any further leaks.

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 12:27 PM  
**To:** AEN Testimony  
**Cc:** mpahukoa@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Mary Ann Pahukoa	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 11:59 AM  
**To:** AEN Testimony  
**Cc:** Renee@MyFirstArtClass.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Renee Ramsey	Individual	Support	No

Comments:

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 11:15 AM  
**To:** AEN Testimony  
**Cc:** clareloprinzi@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
clare loprinzi	Individual	Support	No

Comments: This is essential to pass, crucial for all life, our water we drink, our farms, our keiki all life in our oceans . Please pass this and take care of the problem. Mahalos

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 11:13 AM  
**To:** AEN Testimony  
**Cc:** clareloprinzi@gmail.com  
**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
clare loprinzi	Individual	Support	No

Comments: This is essential to pass, crucial for all life, our water we drink, our farms, our keiki all life in our oceans . Please pass this and take care of the problem. Mahalos

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**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 7:13 PM  
**To:** AEN Testimony  
**Cc:** katc31999@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Kat Culina	Individual	Support	No

Comments:

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## Ke One O Kākuhihewa

O'ahu Council of the Association of Hawaiian Civic Clubs  
P.O. Box 37874  
HONOLULU, HAWAII 96837-1122

### **SB 1259, RELATING TO UNDERGROUND STORAGE TANKS**

February 7, 2017

Ke One O Kākuhihewa, O'ahu Council of the Association of Hawaiian Civic Clubs, with 25 clubs and over 1,000 members on the Island of O'ahu, submits its testimony in strong support for SB 1259, requiring Red Hill and other large-scale, antiquated field-constructed fuel tanks in Hawai'i to comply with federal requirements for standard tanks, including:

- Double lining to prevent fuel releases into the environment
- Cathodic protection to minimize erosion of steel underground
- Dramatically increase monitoring frequency and thoroughness

Freshwater, or Wai, is Hawai'i's most precious resource and it must be protected in the highest regard. The tanks at the Red Hill Bulk Fuel Storage Facility put our water quality at risk and threaten our public health. The facility was constructed in the 1940s and is the largest field-constructed underground storage tank system in the state, storing up to 187 million gallons of fuel just 100 feet above O'ahu's primary aquifer that supplies drinking water to over 600,000 residents from Hālawā to Hawai'i Kai.

Because the tanks are field constructed, the Red Hill facility is exempt from many state and federal regulations on underground storage tanks. This exemption is detrimental to human health and the environment and should not exist for this facility, especially because of its location—the opposite should hold true, stricter regulations should be in place to protect our drinking water resource.

I believe these tanks should be brought into to existing regulations because of the facility's long history of leaking fuel into the surrounding environment and its likelihood to continue to do so. Since the last major spill in 2014, the U.S. Navy has not done enough or acted with urgency to protect O'ahu's primary aquifer, further steps, such as implementing these stricter regulations, must be taken in the immediate future.

I urge you to pass SB 1259.

Thank you very much for this opportunity to provide testimony on this important issue.

Aloha 'Āina.,

*Roth K. Puahala*

Roth K. Puahala, Pelekikena  
Ke One O Kākuhihewa, O'ahu Council of the Association of Hawaiian Civic Clubs

**From:** mailinglist@capitol.hawaii.gov  
**Sent:** Tuesday, February 7, 2017 8:17 PM  
**To:** AEN Testimony  
**Cc:** asamipolitics@gmail.com  
**Subject:** \*Submitted testimony for SB1259 on Feb 8, 2017 13:20PM\*

**LATE**

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Asami Kobayashi	Young Progressives Demanding Action	Support	Yes

Comments:

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**Subject:** Submitted testimony for SB1259 on Feb 8, 2017 13:20PM

**SB1259**

Submitted on: 2/7/2017

Testimony for AEN/PSM on Feb 8, 2017 13:20PM in Conference Room 224

<b>Submitted By</b>	<b>Organization</b>	<b>Testifier Position</b>	<b>Present at Hearing</b>
Shannon Rudolph	Individual	Support	No

Comments: STRONGLY SUPPORT!!!

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