



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

**Testimony COMMENTING on HB0856 HD1
RELATING TO WASTE MANAGEMENT.**

REPRESENTATIVE DAVID A. TARNAS, CHAIR
HOUSE COMMITTEE ON WATER & LAND

Hearing Date: 2/16/2021

Room Number: Via Videoconference

1 **Fiscal Implications:** Unknown

2 **Department Testimony:** Part I: The Department of Health (Department) supports the
3 amendments in Part I of the bill.

4 Legislative intent, as discussed in a committee report last session, clarified that one of the
5 revisions to HRS 342H-52 was, “Making inapplicable to federal agencies the prohibition on
6 construction, operation, modification, expansion, or closure of a municipal solid waste landfill
7 unit without first obtaining a permit from the Director of Health....”

8 The removal of the Department’s authority from permitting of federal municipal solid waste
9 (MSW) landfills, places the state in potential non-compliance of 40 Code of Federal Regulations
10 (CFR), Part 239, Subpart C “Requirements for Adequate Permit Programs.” 40 CFR Part 239,
11 Section 6, “Permitting requirements,” state, “...(d) The state shall have the authority to collect all
12 information necessary to issue permits that are adequate to ensure compliance with the relevant
13 40 CFR part 257, subpart B or 40 CFR part 258 federal revised criteria.” Further, 40 CFR
14 239.13, “Criteria and procedures for withdrawal of determination of adequacy,” states, “(a) The
15 Regional Administrator [of the U.S. Environmental Protection Agency] may initiate withdrawal
16 of a determination of adequacy when the Regional Administrator has reason to believe that: (1)
17 A state no longer has an adequate permit program; or (2) The state no longer has adequate
18 authority to administer and enforce an approved program in accordance with this part.” The loss
19 of a federal approved program will no longer afford other MSW landfills in the State, which are

1 currently all owned by the Counties, the ability to design, operate, close, and monitor their
2 landfill using alternative designs or methods to the federal standard that could be more suitable
3 for local site conditions and more cost-effective. Therefore, the Department respectfully asks that
4 the Department's authority over federal facilities be reinstated and that the amendments in the
5 bill be passed.

6 Part II: The Department of Health (Department) agrees that composting is a great option for
7 organics management and landfill diversion, and offers comment on HB0856-HD1. The bill
8 proposes to exempt "artisan scale" composting facilities from solid waste permitting, provided
9 that they do not pose a vector, dust, or odor problem as determined by the Department, and meet
10 other limitations. "Artisan scale" composting operations are defined as a composting operation
11 that accepts, measured on a monthly average, no more than one cubic yard of green waste or
12 yard trimmings, agricultural materials, vegetable and fruit waste, or coffee grounds and tea
13 leaves per month at a site controlled and owned by the waste generator with the finished compost
14 applied and controlled by the same waste generator.

15 In general, by exempting these facilities from the Department's solid waste regulations, we lose
16 the ability to evaluate the potential impact of the operation and require appropriate controls that
17 are protective of human health and the environment. Similarly, we lose the ability to enforce the
18 implementation of these design and operational procedures that could prevent vector, dust, and
19 odors. We also lose the ability to obtain records for the purpose of calculating waste diversion
20 numbers to support the Aloha+ Challenge diversion goals.

21 The Department prefers to address small composting operations through the Department's solid
22 waste regulations, however, if the Legislature chooses to codify this exemption, we ask the
23 Legislature to consider the following recommendations: (1) Exempt artisan-scale operations
24 from only composting permitting requirements under HRS 342H and related rules. (2) Remove
25 the requirement to disclose the operation to the Department. If the Department does not have
26 regulatory authority over the operation, the notification is not necessary. (3) Remove
27 requirements that will be difficult to enforce, such as determining what is an unreasonable

1 impact to neighbors. (4) Limit the amount of time waste can remain on-site from thirty six
2 months to twelve months to ensure waste is composted and not just dumped. (5) Allow
3 acceptance of only the specified non-pathogenic organic materials including green waste or yard
4 trimmings, agricultural plant materials, vegetable and fruit waste, coffee grounds and tea leaves
5 and remove from acceptance treated lumber, sewage sludge, animal waste, fats, oils, and grease.
6 (6) Placement of this proposed statutory language should be codified in HRS chapter 342H rather
7 than chapter 225P.

8 **Offered Amendments:**

9 Part I: None

10 Part II: “§~~225P-~~ 342H-4.5 **Artisan-scale composting ~~[program]~~operations.** (a) ~~[There is~~
11 ~~established within the department a class of a]~~Artisan-scale composting operations that are sited
12 on land zoned industrial or agricultural~~[-Each artisan-scale composting operation shall disclose~~
13 ~~their operation to the department and]~~ shall be exempt from department of health compost
14 permitting requirements~~[requiring a solid waste management facilities permit; provided that such~~
15 ~~operations do not produce vectors, dust, or odors that unreasonably impact neighbors of the~~
16 ~~operation, as determined by the department]; provided [further] that no waste accepted [by the~~
17 ~~operation remains]~~shall remain on-site for more than twelve~~[thirty-six] months~~~~[-; provided further~~
18 ~~that treated lumber, sewage sludge, animal waste, fats, oils, and grease shall be accepted as waste~~
19 ~~by an operation].~~

20 (b) No more than one artisan-scale composting operation ~~[exempt facility specified in this~~
21 ~~section may]~~shall be located on geographically contiguous land owned or operated by the same
22 person. ~~[Sufficient bulking agent shall be used to provide proper aeration and control leachate~~
23 ~~migration.]~~

24 (c) In order to maintain the compost permitting exemption, an artisan scale composting
25 operation shall maintain documentation that the operation is in compliance with this section.~~[-;~~
26 ~~provided that the d]~~Documentation shall include but is not limited to the amount and type of

1 waste accepted, the date at which the waste was accepted at the artisan-scale composting
2 operation, and when and where the finished compost is land-applied within the artisan-scale
3 composting site.~~(c)~~ All artisan-scale composting operations shall make records available for the
4 department to review upon request.

5 (d) For the purposes of this section, “artisan scale composting operation” means a
6 facility~~composting operation~~ that accepts, measured on a monthly average, no more than one
7 cubic yard of green waste or yard trimmings; agricultural plant materials; vegetable and fruit
8 waste; or coffee grounds and tea leaves per month, and have no more than twelve cubic yards of
9 material being composted at any given time, at a site controlled and owned by the waste
10 generator with the finished compost applied and controlled on-site by the same waste generator.”
11 Thank you for the opportunity to testify on this measure.

DAVID Y. IGE
Governor

JOSH GREEN
Lt. Governor



PHYLLIS SHIMABUKURO-GEISER
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

State of Hawaii
DEPARTMENT OF AGRICULTURE
1428 South King Street
Honolulu, Hawaii 96814-2512
Phone: (808) 973-9600 FAX: (808) 973-9613

**TESTIMONY OF PHYLLIS SHIMABUKURO-GEISER
CHAIRPERSON, BOARD OF AGRICULTURE**

**BEFORE THE HOUSE COMMITTEE ON
WATER AND LAND**

TUESDAY, FEBRUARY 16, 2021

8:30 AM

VIA VIDEO CONFERENCE

**HOUSE BILL NO. 856 HD1
RELATING TO WASTE MANAGEMENT**

Chairperson Tarnas and Members of the Committee:

Thank you for the opportunity to testify on House Bill No. 856 HD1 relating to waste management. This bill seeks to support local farmers, expands the capacity for capturing and processing organic waste, clarifies that composting facilities are excluded from buffer zone requirements that apply to solid waste landfills, and defines a class of artisan-scale composting operation. The Department has concerns with HB 856 HD1 and offers comments and a clarifying amendment.

The proposed definition of artisan scale composting requires finished compost to be applied and controlled by the waste generator. While the language of the bill proactively restricts the inclusion of pathogenic organic material at the facility, enforcement by Department of Health (DOH) would be difficult because it does not have extant authority and regulations to ensure bulking agents such as green waste are free from insects, plant diseases and noxious weed seeds. The bill allows artisan scale composting to be exempt from DOH regulations that would reduce/eliminate the risk posed by proper composting to address these issues. Restricting the waste generator's ability to distribute finished product will facilitate the intent of this bill without imposing



Page 2

the risk of artisan scale composting transmitting invasive species, plant pathogens and weeds to others unknowingly. The department requests this definition be amended to further specify that finished compost must not be distributed and remain on premises.

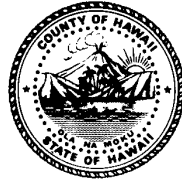
The Department suggests the clarifying amendment at Page 5 Line 1 - 3 (new language underlined):

“site controlled and owned by the waste generator with the finished compost applied and controlled on-site by the same waste generator.”

Thank you for the opportunity to testify on this measure.

Mitchell D. Roth
Mayor

Lee E. Lord
Managing Director



Ramzi I. Mansour
Director

Brenda D. Iokepa-Moses
Deputy Director

County of Hawai'i

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

345 Kekūanāo'a Street, Suite 41 · Hilo, Hawai'i 96720

Ph: (808) 961-8083 · Fax: (808) 961-8086

Email: cohdem@hawaiicounty.gov

February 12, 2021

COMMITTEE ON WATER & LAND

Rep. David A. Tarnas, Chair

Rep. Patrick Pihana Branco, Vice Chair

Hawai'i State Capitol

Honolulu, HI 96813

NOTICE OF HEARING

DATE: February 16, 2021

TIME: 8:30 A.M.

PLACE: Via Videoconference, Conference Room 430, State Capitol, 415 South Beretania Street,
Honolulu, HI

Re: Testimony in Support of House Bill (HB) 856 HD1, Relating to Composting

Dear Chair Tarnas, Vice Chair Branco, and Committee Members,

The County of Hawai'i Department of Environmental Management is herewith submitting testimony **in support of House Bill 856 HD1** that clarifies that composting facilities are excluded from buffer zone requirements and establishes a class of artisan-scale composting operations.

The Department of Environmental Management agrees that the Act supports the local farmers while allowing more materials to be diverted from landfills.

Thank you for your consideration.

Best Regards,

Ramzi Mansour.
DIRECTOR

cc: Mayor Mitchell Roth
Greg Goodale, Hawai'i County Solid Waste Division Chief
George Hayducsko, Hawai'i County Recycling Coordinator



United Food & Commercial Workers Union, Local 480
808 Factory Street, Honolulu, Hawaii 96819
Phone: 808 942.7778

Patrick K. Loo
President

Gwen K. Rulona
Secretary Treasurer

February 14, 2021

Hawaii Legislature
House of Representatives
House Water & Land Committee

RE: OPPOSE HB 856 HD1 - Relating to Waste Management

Aloha Chair Tarnas, Vice-Chair Bronco, and Members of the Committee,

United Food and Commercial Workers Union 480 **OPPOSES** HB 856. The bill proposes to roll back the Environmental Justice work done last session that established a "buffer zone" to protect our communities from waste or disposal facilities.

We stand with our members, brothers and sisters, and their Ohana whose quality of life and health are put needlessly at risk every day due to being in proximity to waste or disposal facilities. Our members and our neighbors should not have to suffer.

We urge you to **HOLD** this bill and allow Hawaii's "buffer zone" law to stay intact. No community should suffer. Please protect the quality of life and health of our community members. Mahalo.

Fraternally,

Patrick K. Loo
President



KE ONE O KĀKUHIIHEWA

O'ahu Council of the
Association of Hawaiian Civic Clubs

HOUSE COMMITTEE ON WATER AND LAND

PŌ'ALUA, PEPLUALI 16, 2021

VIA VIKIŌ

KE KAPIKALA MOKU 'ĀINA

STATE CAPITOL

415 South Beretania Street

HB856 HD1 - Relating to Waste Management

BENTON KEALII PANG, PH.D.
HAWAIIAN CIVIC CLUB OF
HONOLULU
PELEKIKENA

JACOB KA'ŌMAKAOKALĀ AKI-
KING KAMEHAMEHA HCC
HOPE PELEKIKENA

GEORGIANA NAVARRO-
MĀKAHA HCC
HOPE PELEKIKENA 'ELUA

LEATRICE KAUAHI-HCC OF
HONOLULU
PU'UKŪ

ROTH PUAHALA -KING
KAMEHAMEHA HCC
PELEKIKENA IHO NEI

TERI LOO-KO'OLAUPOKO HCC
KĀKAU 'ŌLELO

CHRISTINE "CHRISSEY" ANJO-
PEARL HARBOR HCC
HOLE KĀKAU 'ŌLELO

'AHAHUI SIWILA HAWAII O
KĀPOLEI
KALA HOLDEN

ALI'I PAUAHI HCC
KEHAULANI LUM

'EWA-PU'ULOLO HCC
MARLEEN KAUI SERRAO

HCC OF HONOLULU
ANITA NAONE

KAILUA HCC
MAPUANA DE SILVA

KALIHI-PĀLAMA HCC
JUANITA BROWN
KAWAMOTO

KING KAMEHAMEHA HCC
LETANI PELTIER

KO'OLAULOLO HCC
RANAE "TESSIE"
FONOIMOANA

KO'OLAUPOKO HCC
ROCKY KALUHIWA

LUALUALEI HCC
SHIRLINE HO

MĀKAHA HCC
LUANN LANKFORD-
FABORITO

MAUNALUA HCC
ROSE KITTY SIMONDS

NA LANI 'EHA HCC
R. KELANI RAMOS

NĀNĀIKAPONO HCC
JAYCINE HICKS

PAPAKŌLE'A HCC
KEALI'LUM

PEARL HARBOR HCC
ANTOINETTE LEE

PRINCE KŪHIŌ HCC
A. MAKANA PARIS

PRINCESS KAHANU HCC
DREANA KALILI

PRINCESS KAI'ULANI HCC
RUSTY RODENHURST

QUEEN EMMA HCC
RAWLETTE P. KRAUT

HCC OF WĀHIAWA
NOELANI DEVINCENT

HCC OF WAIALUA
MAKALAPUA CASSON-
FISHER

WAI'ANAE HCC
CYNTHIA ENRIQUEZ

WAIKIKI HCC
DWYNN KAMAI

HCC OF WAIMĀNALO
LOUANNA KAIO

Aloha Luna Ho'omalua David A. Tarnas, *Hope Luna Ho'omalua* Patrick Pihana Bronco, and members of the House Committee on Water & Land:

Ke One O Kākuhihewa-O'ahu Council for the Association of Hawaiian Civic Clubs **OPPOSES** HB856 HD1. This bill in its current form needlessly endangers the health of our community members by removing protections afforded them by Hawaii's "buffer zone" law established by Act 73 (2020).

No community should suffer the negative health impacts and decrease in quality of life from a waste or disposal facility, including a landfill. This bill would allow waste or disposal facilities within one-half mile from the public and put at risk our community members' health

Attached is our resolution titled: **Urging the State of Hawai'i and Counties to Create a Four-Mile Buffer Zone Around Landfills**. It was passed at our council meeting on August 24, 2019.

Thus, Ke One O Kākuhihewa respectfully urges the Committee to **HOLD** HB856 HD1.

Ke One O Kākuhihewa is a native Hawaiian council made up of 24 civic clubs on the island of O'ahu. Our oldest member, Hawaiian Civic Club of Honolulu was established by Prince Jonah Kūhiō Kalaniana'ole on December 7, 1918.

Sincerely,

Benton Kealii Pang, Ph.D.

**KE ONE O KĀKUIHEWA, O‘AHU COUNCIL OF THE
ASSOCIATION OF HAWAIIAN CIVIC CLUBS**

RESOLUTION NO. 19- 4

**URGING THE STATE OF HAWAI‘I AND COUNTIES TO CREATE A FOUR-MILE
BUFFER ZONE AROUND LANDFILLS**

WHEREAS, there is an emergence of scientific studies affirming the health hazards of living and working near landfills (Waste and Human Health – World Health Organization, Nov 2015; *Living near a landfill may damage your health*, International Journal of Epidemiology, Oxford University Press, 2016); and

WHEREAS, the State of Hawai‘i and its counties lack landfill buffer zone requirements that adequately protect public health; and

WHEREAS, adequate landfill buffer zones provide minimum space of four (4) miles and improvements, particularly trees and other vegetation, between a landfill’s structures used for handling or storing waste and homes, schools, and other public places; and

WHEREAS, hundreds of residents of Nānākuli Town and the Nānākuli Hawaiian Homestead, thousands of students attending Ka Wai Hona Public Charter School, Nānāikapono Elementary School, Nānākuli Elementary School, Nānākuli High and Intermediate School, Kamehameha Schools Community Learning Center, and thousands of members of the public go to places of worship, clinics, grocery stores, restaurants, and visit their *‘ohana* at the Nānākuli *kupuna* housing, all within four (4) miles of Oahu’s only construction and demolition landfill, the privately-owned landfill operated by PVT Land Company, Ltd. (PVT Landfill); and

WHEREAS, the current buffer zone between PVT Landfill and its nearest residential units and churches is approximately 750 feet; and

WHEREAS, from the 1980s, *kama ‘āina* offered numerous oral and written testimony at Neighborhood Board meetings, Department of Health public hearings, and community gatherings at churches voicing concerns over the adverse health impacts of living and working in close proximity to landfills in general and PVT Landfill, in specific; and

WHEREAS, the State Department of Health has still not addressed the outstanding inquires from the community related to the long-term health effects of the debris that runs off of PVT Landfill during heavy rains, the leachate that permeates the ground, the dust particles from both PVT Landfill and its trucks that coat neighborhood houses as they drive through the community, and the gasses released by the decomposition of waste and other landfill activities, especially the cumulative and long-term health effects on those living and working within four (4) miles of landfill; and

WHEREAS, the predominantly Native Hawaiian communities of Nānākuli Town and Nānākuli Hawaiian Homestead should no longer be subject to the adverse effects of landfills; and

WHEREAS, no community in the State of Hawai‘i should be impacted by the adverse effects of landfills; and

NOW, THEREFORE, BE IT RESOLVED, by Ke One O Kākuhihewa, O‘ahu Council of the Association of Hawaiian Civic Clubs at its Special Meeting at Kapālama, O‘ahu, in the malama of Mahoe Mua and the rising of Kōloakūkahi this 24th day of August 2019, urge the State of Hawai‘i and City and County of Honolulu to create a four-mile buffer zone around landfills.

INTRODUCED BY: Nānāikapono Hawaiian Civic Club and Prince Kūhiō Hawaiian Civic Club

ACTION: Adopted



Luna O Nā Papa Alaka'i

Pelekikena

Anthony Makana Paris

Hope Pelekikena 'Ekahi

Randi Fernandez

Hope Pelekikena 'Elua

K ā'eo Kealoha Lindsey

Pu'ukū

Leilani Williams-
Solomon

Kākau 'Ōlelo Ho'opa'a

Sai Furukawa

Kākau 'Ōlelo Palapala

Kamuela Werner

Pelekikena Hala Koke

Yvonne 'PeeWee' Ryan

Nā Luna Alaka'i

Alan Akao
Kuni Agard
Puamana Crabbe
Kanani Pali
Marlene Sai
Bruce Wong

P.O. Box 4728
Honolulu, HI 96812

www.pkhcc.org

*Founded in 1964
by Lili'uokalani
Kawānanakoa Morris*

House Committee on Water & Land

Tuesday, February 16, 2021

Via Videoconference

State Capitol

415 South Beretania Street

Re: SBHB856 HD1 - RELATING TO WASTE MANAGEMENT

Aloha Chair Tarnas, Vice-Chair Branco and members of the House committee on Water & Land:

The Prince Kūhiō Hawaiian Civic Club **OPPOSES** HB856 HD1. This bill in its current form needlessly endangers the health of our community members by removing protections afforded them by Hawaii's "buffer zone" law established by Act 73 (2020). At its 60th annual convention, the Association of Hawaiian Civic Clubs adopted resolution 2019-52, urging the State of Hawai'i and all counties to create an adequate buffer zone around landfills, with a minimum buffer zone of one-half mile.

E aloha kekahi i kekahi

Love one another.

No community should suffer the negative health impacts and decrease in quality of life from a waste or disposal facility, including a landfill. This bill would allow waste or disposal facilities within one-half mile from the public and put at risk our community members' health.

Our club continues to stand in solidarity with all those who suffer from the negative effects of waste or disposal facilities being placed too close to communities and believe that we all should have a clean and healthy environment. We have both educated and been educated by our island communities on the health hazards and negative effects of landfills. Particularly, how Native Hawaiians have faced environmental racism given the placement of the PVT Landfill in the Wai'anae coast of O'ahu. There, more than 18,000 people who live, work, and play daily within 2 miles of the currently operating landfill, and of those, 13,000 are Native Hawaiians. Moreover, two homestead communities, Princess Kahanu and Nānākuli, are located less than 0.5 miles from the currently operating landfill.

On August 20, 2019, we stood in solidarity with Nānāikapono Hawaiian Civic

Club and hundreds of community members in opposition to the relocation of the PVT Landfill to remain in Nānākuli and Mā‘ili - a mere 750 feet from homes - at the Nānākuli and Mā‘ili Neighborhood Board meeting. On September 4, 2019 we delivered a petition of more than 5,500 signatures in opposition of the referenced PVT Landfill relocation to a special session of the Nānākuli-Mā‘ili Neighborhood Board and later to the City and County of Honolulu, Department of Planning and Permitting. On December 16, 2019, we presented with community leader Eddie Werner of the Nānākuli Homestead on the public health crisis in Nānākuli and Mā‘ili to the Hawaiian Homes Commission. On February 14th, we presented at a Native Hawaiian speaker series hosted by Papa Ola Lōkahi and was invited back to elaborate at another session on April 24th. These are some of the actions that we have taken, along with hundreds of community members who labor to *mālama ‘āina* and *aloha ‘ohana* – trying to stop a landfill from being placed in a community’s backyard.

The Public Health Crisis already occurring in Nānākuli and Mā‘ili will likely be exacerbated due to the evolving SARS-CoV-2 virus (abbreviated as Covid-19 *a.k.a.* Coronavirus Disease 2019) pandemic.

Our communities in Nānākuli and Mā‘ili, due to the public health crisis already occurring there, fit the criteria of being within the vulnerable populations of those that would have a higher likely hood of death due to contracting Covid-19. We must do better.

In the spirit of *lōkahi*, we continue to advocate, not just for Nānākuli and Mā‘ili, but for all communities in our beloved Hawai‘i. Let us *aloha* each other and make sure that no community should suffer from the unmitigated ill effects of waste or disposal facilities, including landfills.

Last year, SB2386 SD HD2 was signed into law as Act 73 guaranteeing a base level of protection for all future generations. Please do not undue that great work of Environmental Justice.

Founded in 1964, PKHCC was organized to promote the education and social welfare of people of Hawaiian ancestry and objectives include supporting high ethical standards in business, industry and the professional fields of enterprise.

PKHCC urges the committee to HOLD HB859 HD1. #HawaiianLivesMatter

Me ke aloha,



A. Makana Paris

Pelekikena

president@pkhcc.org

Encl.

‘A‘ole PVT Compiled Community Petitions 5,500+ link: <https://tinyurl.com/rzx766e>



House of Representatives
Committee on Water & Land

Pō‘alua, Pepeluali 16, 2021
Via Wikiō
Ke Kapikala Moku ‘āina
415 South Beretānia Street

Re: HB856 HD1 - Relating to Waste Management

Aloha Luna Ho‘omalu David A. Tarnas, *Hope Luna Ho‘omalu* Patrick Pihana Bronco, and members of the House Committee on Water & Land:

The Association of Hawaiian Civic Clubs **OPPOSES** HB856 HD1. This bill in its current form needlessly endangers the health of our community members by removing protections afforded them by Hawaii’s “buffer zone” law established by Act 73 (2020).

No community should suffer the negative health impacts and decrease in quality of life from a waste or disposal facility, including a landfill. This bill would allow waste or disposal facilities within one-half mile from the public and put at risk our community members’ health.

At its 60th annual convention, the Association adopted resolution 2019-52, urging the State of Hawai‘i and all counties to create an adequate buffer zone around landfills, with a minimum buffer zone of one-half mile.

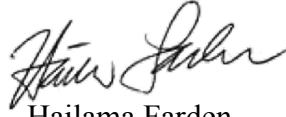
Thus, the Association respectfully urges the Committee to **HOLD** HB856 HD1.

The civic club movement was founded in 1918 by Congressional Delegate Prince Jonah Kūhiō Kalaniana‘ole with the creation of the Hawaiian Civic Club; the Association was formally organized in 1959 and has grown to a confederation of over sixty (60) Hawaiian Civic Clubs

located throughout the State of Hawai‘i and the United States. The Association is the oldest Hawaiian community-based grassroots organization. The Association is governed by a 16-member Board of Directors; advocates for improved welfare of Native Hawaiians in culture, health, economic development, education, social welfare, and nationhood; and perpetuates and preserves language, history, music, dance and other Native Hawaiian cultural traditions.

Mahalo for allowing us to share our *mana* ‘o.

Me ka ‘oia ‘i ‘o,

A handwritten signature in black ink, appearing to read 'Hailama Farden', written in a cursive style.

Hailama Farden

Pelekikena

ASSOCIATION OF HAWAIIAN CIVIC CLUBS

A RESOLUTION

No. 2019 - 52

URGING THE STATE OF HAWAI‘I AND ALL COUNTIES TO CREATE AN ADEQUATE BUFFER ZONE AROUND LANDFILLS WITH A MINIMUM BUFFER ZONE OF ONE-HALF MILE

WHEREAS, there is an emergence of scientific studies affirming the health hazards of living and working near landfills, including studies published by the World Health Organization in 2015, and “*Living near a landfill may damage your health*” published by the International Journal of Epidemiology, Oxford University Press, in 2016; and

WHEREAS, the State of Hawai‘i and the four counties lack landfill buffer zone requirements that adequately protect public health; and

WHEREAS, adequate landfill buffer zones provide minimum space of four miles and improvements, particularly trees and other vegetation, between a landfill’s structures used for handling or storing waste and homes, schools, and other public places; and

WHEREAS, hundreds of residents of Nānākuli Town and the Nānākuli Hawaiian Homestead, thousands of students attending Ka Waihona o Ka Na‘auao Public Charter School, Nānāikapono Elementary School, Nānākuli Elementary School, Nānākuli High and Intermediate School, Kamehameha Schools Community Learning Center, and thousands of members of the public go to places of worship, clinics, grocery stores, restaurants, and visit their ‘ohana at the Nānākuli kupuna housing, all within four miles of O‘ahu’s only construction and demolition landfill, the privately-owned landfill operated by PVT Land Company, Ltd. (PVT Landfill); and

WHEREAS, the current buffer zone between PVT Landfill and the nearest residential units and churches is approximately 750 feet; and

WHEREAS, since the 1980s, kama‘āina offered numerous oral and written testimony at Neighborhood Board meetings in the City and County of Honolulu, State of Hawai‘i Department of Health public hearings, and community gatherings at churches voicing concerns over the adverse health impacts of living and working in close proximity to landfills in general and PVT Landfill, in specific; and

WHEREAS, the State of Hawai‘i Department of Health has still not addressed the outstanding inquiries from the community related to the long-term health effects of the debris that

runs off of PVT Landfill during heavy rains, the leachate that permeates the ground, the dust particles from both PVT Landfill and its trucks that coat neighborhood houses as they drive through the community, and the gasses released by the decomposition of waste and other landfill activities, especially the cumulative and long-term health effects on those living and working within four miles of landfill; and

WHEREAS, the predominantly Native Hawaiian communities of Nānākuli Town and Nānākuli Hawaiian Homestead should no longer be subject to the adverse effects of landfills; and

WHEREAS, no community in Hawai‘i should be impacted by the adverse effects of landfills.

NOW, THEREFORE, BE IT RESOLVED, by the Association of Hawaiian Civic Clubs at its 60th Annual Convention in Lahaina, Maui, in the malama of Welchu and the rising of Lā‘au Pau, this 16th day of November 2019, urging the State of Hawai‘i and City and County of Honolulu to create an adequate buffer zone around landfills with a minimum buffer zone of one-half mile; and

BE IT FURTHER RESOLVED, that a certified copy of this resolution be transmitted to the Governor of the State of Hawai‘i, President of the State Senate, Speaker of the State House of Representatives, Chair of the State Senate subject matter committee on Hawaiian Affairs, Chair of the State House subject matter committee on Hawaiian Affairs, Chair of the Board of Trustees of the Office of Hawaiian Affairs, and all County Mayors.



The undersigned hereby certifies that the foregoing Resolution was duly adopted in the malama of Welchu and the rising of Lā‘au Pau on the 16th day of November 2019, at the 60th Annual Convention of the Association of Hawaiian Civic Clubs in Lahaina, Maui.

Handwritten signature of Hailama V. K. K. Farden.

Hailama V. K. K. Farden, President



The Thirty-First Legislature
Regular Session of 2021

THE HOUSE

Committee on Water & Land

Rep. David A. Tarnas, Chair

Rep. Patrick Pihana Branco, Vice Chair

State Capitol, Videoconference

Tuesday, February 16, 2021; 8:30 a.m.

**STATEMENT OF THE LWU LOCAL 142 ON H.B. 643
RELATING TO WASTE MANAGEMENT**

The ILWU Local 142 **opposes** H.B. 856 H.D.1, which part I: Clarifies that composting facilities are excluded from buffer zone requirements and part II: Establishes a class of artisan-scale composting operations.

Last year, the 31st Hawaii State Legislature sent SB2386 SD HD2 to Governor David Ige who signed it into law as Act 73 on September 15, 2020. Last year, Hawaii took a monumental Environmental Justice step forward by providing a one-half mile “buffer zone” to protect our communities from ‘opala.

The proposed amendments in Part I of this bill jeopardizes the protections afforded by the “buffer zone.” The HLC is not against composting generally nor artisan-composting in specific. The HLC supports the prohibitions of ‘opala in a waste or disposal facility to be within the “buffer zone” as articulated under the current law. No community should suffer the health and quality of life ill effects of being next to a waste or disposal facility.

The HLC continues to stand in solidarity with our family in Nānākuli and Mā‘ili who are suffering from a public health crisis as they live next to an operating landfill that is mere feet away from homes and public spaces. Living next to waste or disposal facilities like landfills has led to the decreased quality of life and health of our neighbors.

According to the Center for Disease Control and Prevention/National Center for Health Statistics Neighborhood Life Expectancy Project, our members and their families within 2 miles of the current PVT Landfill live **10 years less than the state average of 82 years**, being the 2nd and 3rd lowest life expectancies in the entire state. This is unacceptable. Every community in Hawai‘i as a matter of fairness and decency deserves a “clean and healthful environment” (HI State Constitution Article XI, Section 9; In re Maui Elec. Co., 2017 Haw.) PVT currently operates only 750 feet from residences (Draft Environmental Impact Statement: PVT Integrated Solid

Waste Management Facility - Expanded Recycling, Landfill, Grading and Renewable Energy Project). The PVT landfill also operates within two miles of Nānākuli Elementary, High and Intermediate, Nānāikapono Elementary, Ka Wai Hona Public Charter School, and Kamehameha Schools pre-school, places of worship, stores, medical clinics, and kupuna housing that over 18,000 people daily live, work, and play.

The global scientific community affirms what the community of Wai‘anae has been living through -- especially those that live, work, and play in Nānākuli -- that landfills are a health hazard (See Vrijheid M., Health effects of residence near hazardous waste landfill sites: a review of epidemiologic literature. *Environ Health Perspect*, 2000; Njoku PO, Edokpayi JN, Odiyo JO, Health and Environmental Risks of Residents Living Close to a Landfill: A Case Study of Thohoyandou Landfill, Limpopo Province, South Africa. *Int J Environ Res Public Health*, 2019; Waste and Human Health: Evidence and needs, World Health Organization Nov 2015).

We acknowledge that composting is both a necessary and desirable part of a sustainable waste management for our islands. However, as policy and laws are crafted to support better composting, recycling, or improved waste management measures, **we must always remember to put our community’s health and safety first.**

No community should suffer like those in Nānākuli and Mā‘ili. So, we ask that you do not undue the good work done by the 31st Hawaii State Legislature. Protect our people by protecting the “buffer zone.”

We recommend deferral of H.B. 856, H.D.1. Thank you for the opportunity to testify.



HAWAI'I LABOR COALITION

MORE THAN 65,000 AND GROWING

February 16, 2021

Hon. Rep. David Tarnas, Chair
Committee on Water, Land & Hawaiian Affairs
House of Representatives
State of Hawaii

Aloha:

The Hawaii Labor Coalition (HLC) **OPPOSES** HB856 HD1. The bill has two parts; Part I: Clarifies that composting facilities are excluded from buffer zone requirements. Part II: Establishes a class of artisan-scale composting operations.

Last year, the 31st Hawaii State Legislature sent SB2386 SD HD2 to Governor David Ige who signed it into law as Act 73 on September 15, 2020. Last year, Hawaii took a monumental Environmental Justice step forward by providing a one-half mile “buffer zone” to protect our communities from ‘opala.

The proposed amendments in Part I of this bill jeopardizes the protections afforded by the “buffer zone.” The HLC is not against composting generally nor artisan-composting in specific. The HLC supports the prohibitions of ‘opala in a waste or disposal facility to be within the “buffer zone” as articulated under the current law. No community should suffer the health and quality of life ill effects of being next to a waste or disposal facility.

The HLC continues to stand in solidarity with our family in Nānākuli and Mā‘ili who are suffering from a public health crisis as they live next to an operating landfill that is mere feet away from homes and public spaces. Living next to waste or disposal facilities like landfills has led to the decreased quality of life and health of our neighbors.

According to the Center for Disease Control and Prevention/National Center for Health Statistics Neighborhood Life Expectancy Project, our members and their families within 2 miles of the current PVT Landfill live **10 years less than the state average of 82 years**, being the 2nd and 3rd lowest life expectancies in the entire state. This is unacceptable. Every community in Hawai‘i as a matter of fairness and decency deserves a “clean and healthful environment” (HI State Constitution Article XI, Section 9; In re Maui Elec. Co., 2017 Haw.) PVT currently operates only 750 feet from residences (Draft Environmental Impact Statement: PVT Integrated Solid Waste Management Facility - Expanded Recycling, Landfill, Grading and Renewable Energy Project). The PVT landfill also operates within two miles of Nānākuli Elementary, High and Intermediate, Nānāikapono



HAWAI'I LABOR COALITION

MORE THAN 65,000 AND GROWING

Elementary, Ka Wai Hona Public Charter School, and Kamehameha Schools pre-school, places of worship, stores, medical clinics, and kupuna housing that over 18,000 people daily live, work, and play.

The global scientific community affirms what the community of Wai‘anae has been living through -- especially those that live, work, and play in Nānākuli -- that landfills are a health hazard (*See* Vrijheid M., Health effects of residence near hazardous waste landfill sites: a review of epidemiologic literature. *Environ Health Perspect*, 2000; Njoku PO, Edokpayi JN, Odiyo JO, Health and Environmental Risks of Residents Living Close to a Landfill: A Case Study of Thohoyandou Landfill, Limpopo Province, South Africa. *Int J Environ Res Public Health*, 2019; Waste and Human Health: Evidence and needs, World Health Organization Nov 2015).

We acknowledge that composting is both a necessary and desirable part of sustainable waste management for our islands. However, as policy and laws are crafted to support better composting, recycling, or improved waste management measures, **we must always remember to put our community's health and safety first.**

No community should suffer like those in Nānākuli and Mā‘ili. So, we ask that you do not undue the good work done by the 31st Hawaii State Legislature. Protect our people by protecting the “buffer zone.”

Mahalo.

February 16, 2021
House Water & Land Committee
8:30 am

RE: OPPOSE HB856 HD1 – Relating to Waste Management

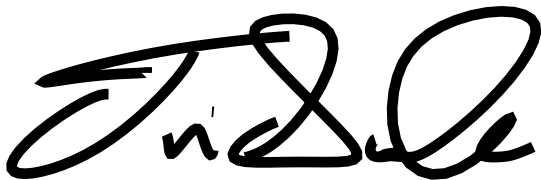
Aloha Chair Tarnas, Vice-Chair Bronco, and members of the committees:

The IATSE Local 665 **OPPOSES** HB856. The bill proposes to roll back the Environmental Justice work done last session that established a “buffer zone” to protect our communities from waste or disposal facilities.

We stand with our members, brothers and sisters, and their ‘ohana whose quality of life and health are put needlessly at risk every day due to being in proximity to waste or disposal facilities. Our members and our neighbors should not have to suffer.

We urge you to **HOLD** this bill and allow Hawaii’s “buffer zone” law to stay intact. No community should suffer. Please protect the quality of life and health of our community members. Mahalo.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tuia'ana Scanlan'. The signature is stylized and cursive, with a large initial 'T' and 'S'.

Tuia'ana Scanlan
President, IATSE Local 665



To: The House Committee on Water & Land
From: Sherry Pollack, 350Hawaii.org
Date: Tuesday, February 16, 2021, 8:30am

In strong support of HB856 HD1

Aloha Chair Tarnas, Vice Chair Branco, and members of the Water & Land committee,

I am Co-Founder of the Hawaii chapter of 350.org, the largest international organization dedicated to fighting climate change. 350Hawaii's 6,000 members **strongly support HB856 HD1**.

This bill would reduce greenhouse gas emissions by exempting small scale composting and artisan scale composting from certain requirements. Diverting organics to compost piles significantly reduces methane production in landfills, while adding finished compost to soils improves their health and increases their capacity to capture carbon. Sequestering carbon in soil is an effective way an individual/community can combat climate change.

Mahalo for the opportunity to testify in **strong support** of this very important legislation.

Sherry Pollack
Co-Founder, 350Hawaii.org



February 16, 2021

COMMITTEE ON WATER AND LAND

Representative David A. Tarnas, Chair

Representative Patrick Pihana Branco, Vice Chair

DATE: February 16, 2021

TIME: 8:30 a.m.

PLACE: Via videoconference

RE: Testimony in support of HB856 relating to waste management

Aloha Chair Tarnas, Vice Chair Branco, and Members of the Committee,

Zero Waste Big Island (ZWBI) is a community group advocating for an equitably waste-free Hawai'i. We, members of the steering committee of ZWBI, are very encouraged by the progressive conversation around composting and organics diversion.

Hawai'i Island landfill discards are 22.4% paper and 33.1% organics, meaning *over half* of the landfill's composition are compostable materials and therefore viable to be successfully diverted from the landfill (source: CoH Integrated Solid Waste Management Plan Draft 2019).

We support the process of legislators finding accessible solutions for our urgent community composting needs.

Mahalo for receiving our testimony,

Zero Waste Big Island Steering Committee

Jennifer Navarra

Melody Euaparadorn

Monica Rott Stone



**HAWAII BUILDING &
CONSTRUCTION** TRADES
COUNCIL

735 Bishop Street, Suite 412 * Honolulu, HI 96813
(808) 524-2249 * www.hbctc.org

February 16, 2021

Hawaii State Legislature
House Water & Land Committee
8:30 am

RE: HB856 HD1 – Relating to Waste Management

Aloha Chair Tarnas, Vice-Chair Bronco, and members of the committee:

My name is Gino Soquena, Executive Director of the Hawaii Building & Construction Trades Council (HBCTC) which represents 16 of the 19 construction trade unions here in Hawaii. The HBCTC **OPPOSES** HB856. The bill proposes to roll back the Environmental Justice work done last session that established a “buffer zone” to protect our communities from waste or disposal facilities.

We stand with our members, brothers and sisters, and their ‘ohana whose quality of life and health are put needlessly at risk every day due to being in proximity to waste or disposal facilities. Our members and our neighbors should not have to suffer.

We urge you to HOLD this bill and allow Hawaii’s “buffer zone” law to stay intact. No community should suffer. Please protect the quality of life and health of our community members. Thank you for the opportunity to testify.

Mahalo Nui Loa,

Gino Soquena
Executive Director
Hawai‘i Building & Construction Trades Council



Environmental Caucus

The Democratic Party of Hawaii

February 16, 2021

Re: **Bill #HB856**

Related to Waste Management Hearing: February 16, 2021

8:30am

Position: **Strong Support**

Aloha Chair Tarnas, Vice-Chair Branco and members of the Water and Land Committee,

The Environmental Caucus of the Democratic Party of Hawai'i (The Party) stands in strong support of HB856, Part 1 which: broadens the definition of "food waste" as used in integrated solid waste management. Excludes facilities designed primarily for composting organic material such as food waste and green waste, on-site school campus food waste programs, and recycling drop-off facilities from the requirement that waste or disposal facilities shall not be constructed, modified, or expanded without first establishing a buffer zone of no less than one-half mile from the nearest residential, school, or hospital property line. Part 2 establishes a class of artisan-scale composting operations exempt from department of health regulations to divert organic materials from Hawaii's landfills.

Existing Department of Health regulations for composting are outdated and prohibitive. As we adhere to laws written over 20 years ago, the rest of the nation is moving forward with programs that ease restrictions on composting. This nationwide trend is driven by the need to take decisive action in the era of global warming. Diverting organics to compost piles significantly reduces methane production in landfills, while adding finished compost to soils improves their health and increases their capacity to capture carbon. This bill brings Hawai'i into alignment with reforms being made nationwide. Both Ohio and Guam have had success in their regulations to encourage new programs.

As municipalities across the US take decisive action to reap the many benefits of composting, Hawaii residents are held back by outdated state regulations that treat diverting and processing organic waste as an industrial activity. This bill aligns Hawaii with the national trend towards easing restrictions on composting by specifically acknowledging the benefits of small-scale composting efforts that are clearly not industrial in



Environmental Caucus

The Democratic Party of Hawaii

nature and by allowing them to take place on industrial and agricultural lands provided they establish a ½ mile buffer zone around the waste or disposal facility.

Finally, a widespread distributed system of artisan scale composting operations represents the most effective means for capturing and processing organics with the least impact to the environment. Such operations pose no public health threat and there is no reason to hold back operators at this scale as DOH updates the regulations that govern commercial scale operations.

Mahalo for your consideration,

Jeff McKnight

Chair ECDPH Food Security and Agriculture Committee
Vice Chair, Environmental Caucus of the Democratic Party of Hawai'i

IRON WORKERS STABILIZATION FUND

February 16, 2021, 8:30 am

Committee on Water & Land
House of Representatives
Via Videoconference
State Capitol
415 South Beretania Street

Re: HB856 HD1 - RELATING TO WASTE MANAGEMENT.

Aloha Chair David A. Tarnas, Vice-Chair Patrick Pihana Bronco, and members of the House Committee on Water & Land:

We **OPPOSE** HB856 HD1. This bill, if enacted, will disastrously affect the health and quality of life of our community members by allowing waste facilities next to them.

We believe it would be good policy to have waste and disposal facilities, including landfills in isolated areas with appropriate zoning. Such sites on O‘ahu could include places like Kalaeloa and Campbell Industrial Park. Currently the communities in Nānākuli and Mā‘ili are suffering from a public health crisis, with a landfill only a few feet away from homes, farms, and Ulehawa stream. We stand in solidarity with our neighbors and all those that suffer from landfills in their communities.

According to the Center for disease Control/National Center for Health Statistics Neighborhood Life Expectancy Project, our members and their families within 2 miles of the current landfill in Nānākuli and Mā‘ili live **8 to 10 years less than the state average of 82 years**, being the 2nd and 3rd lowest life expectancies in the entire state. This is unacceptable. As a matter of fairness, every community in Hawai‘i deserves a “clean and healthful environment” (HI State Constitution Article XI, Section 9; In re Maui Elec. Co., 2017 Haw.)

The global scientific community affirms what the communities of Wai‘anae have been living through -- especially those that live, work, and play in Nānākuli -- that landfills are a health hazard (*See Vrijheid M., Health effects of residence near hazardous waste landfill sites: a review of epidemiologic literature. Environ Health Perspect, 2000; Njoku PO, Edokpayi JN, Odiyo JO, Health and Environmental Risks of Residents Living Close to a Landfill: A Case Study of Thohoyandou Landfill, Limpopo Province, South Africa. Int J Environ Res Public Health, 2019; Waste and Human Health: Evidence and needs, World Health Organization Nov 2015*).

We may not have known the negative effects of landfills or other waste or disposal facilities decades ago, but now we know better and have no excuse. No community should suffer negative effects of waste or disposal facilities. Do the right thing, leave the “buffer zone” intact.

HB-856-HD-1

Submitted on: 2/14/2021 11:37:45 AM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Roseann Michaud	Individual	Support	No

Comments:

I support this bill that promotes composting and keeps organic wastes out of the landfill.

HB-856-HD-1

Submitted on: 2/14/2021 1:58:20 PM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Melvin Paris	Individual	Oppose	No

Comments:

Aloha Reps:

Don't mess with the buffer zone. Keep our people safe. Mahalo.

Melvin Paris

Kapolei, Oahu

HB-856-HD-1

Submitted on: 2/14/2021 2:00:02 PM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Henrietta Paris	Individual	Oppose	No

Comments:

Aloha Representatives:

As a retired janitor, I know how 'opala can be a nuisance and cause pilikia for people. Pleaes protect the buffer zone. Keep 'opala away from our community. Mahalo and have a blessed day.

Herietta Paris

Kapolei, Oahu

HB-856-HD-1

Submitted on: 2/14/2021 5:51:40 PM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Anthony Makana Paris	Individual	Oppose	No

Comments:

Aloha Chair Tarnas, Vice-Chair Bronco, and honorable representatives:

Please allow the "buffer zone" law enacted last year to remain in place, to ensure that future generations do not suffer the ills of waste or disposal facilities. Mahalo for your kind consideration. Have a wonderful day.

Me ke aloha,

Makana Paris

Kapolei, Oahu

House Committee on Water & Land
Representative David A. Tarnas, Chair
Representative Patrick Pihana Bronco, Vice Chair

Tuesday, February 16, 2021
8:30 am, Videoconference

HB 856 HD1 - RELATING TO WASTE MANAGEMENT

Aloha Chair Tarnas and Vice-Chair Bronco, and members of the House Committee on Water & Land:

I am in **OPPOSITION** to the intent of HB 856 HD1 that would in Part I exclude composting facilities from the buffer zone requirement. As a mahi ‘ai myself, I am a strong proponent of composting in general, however, as a public health practitioner, I oppose the opportunity for composting facilities to be sited and operated within one-half mile of communities.

From Mā‘ili, my name is Kamuela Werner. I graduated from Nānākuli High School, hold a Master of Public Health from the University of Hawai‘i and am currently studying Applied Cultural Anthropology with a research focus in environmental racism against Native Hawaiians of Nānākuli-Wai‘anae. In 2020, my community of Nānākuli fought hard for the passage of SB 2386 that would become Act 73—the very Act that this bill will render impotent against protecting public health from organic solid waste (including sewage sludge) exposure if passed.

Composting results in elevated concentrations of bioaerosols, particularly during agitation activities.¹ Bioaerosols can stay suspended in the air for prolonged periods and potentially travel long distances from their source and as a result may pose health hazards to nearby communities with elevated exposures.² There is evidence linking bioaerosol emissions from composting facilities to poor respiratory health in nearby residents.³ Moreover, there is evidence that workers at compost facilities have an increased risk of developing health problems.⁴ Though the most current systematic literature review on this matter found insufficient evidence to provide a quantitative comment on exposure risk, I believe our residents, especially the poor and politically vulnerable, should not be guinea pigs.

Lastly, the Hawai‘i Department of Health (HDOH) has never clarified that there is no risk to the public for living in proximity to compost facilities, especially within one-half mile. Further, HDOH has never reviewed the findings of independent studies which say that there is no risk to

¹ Robertson, S., Douglas, P., Jarvis, D., & Marczylo, E. (April 01, 2019). Bioaerosol exposure from composting facilities and health outcomes in workers and in the community: A systematic review update. *International Journal of Hygiene and Environmental Health*, 222, 3, 364-386.

² Ibid.

³ Pearson, C., Littlewood, E., Douglas, P., Robertson, S., Gant, T. W., & Hansell, A. L. (January 01, 2015). Exposures and Health Outcomes in Relation to Bioaerosol Emissions From Composting Facilities: A Systematic Review of Occupational and Community Studies. *Journal of Toxicology and Environmental Health, part B, critical Reviews*, 18, 1, 43-69.

⁴ Hambach, R., Droste, J., François, G., Weyler, J., Van, S. U., De, S. A., Vanoeteren, J., ... SpringerLink (Online service). (2012). Work-related health symptoms among compost facility workers: a cross-sectional study. (*Archives of public health*.)

public health from compost facilities, especially to the thousands of people that live, work, and play within a one-half mile radius of current compost facility operations.

Please maintain the public health protections of Act 73 by **NOT PASSING** HB 856 HD1.

Ke aloha 'āina,

Kamuela Werner, MPH

HB-856-HD-1

Submitted on: 2/14/2021 10:13:12 PM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Ted Bohlen	Individual	Support	No

Comments:

Support

HB-856-HD-1

Submitted on: 2/15/2021 3:22:10 PM

Testimony for WAL on 2/16/2021 8:30:00 AM

Submitted By	Organization	Testifier Position	Present at Hearing
Mary Lacques	Individual	Support	No

Comments:

Testimony in strong SUPPORT of HB 856 to bolster and ensure the viability of small-scale composting programs.