



STATE OF HAWAII
DEPARTMENT OF HEALTH
KA 'OIHANA OLAKINO
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

**Testimony COMMENTING on SB0788
RELATING TO VEGETATIVE BURNING**

SENATOR MIKE GABBARD, CHAIR
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT

SENATOR KARL RHOADS, CHAIR
SENATE COMMITTEE ON JUDICIARY

Hearing Date: 2/22/2023

Room Number: 224

1 **Fiscal Implications:** There are probable economic and operational impacts on local farm
2 businesses throughout the State of Hawaii.

3 **Department Testimony:** The Department of Health (Department) offers comments on this
4 measure that proposes to prohibit permits for the burning of green waste in residential areas or
5 within one thousand feet of a residential property. Our comments are as follows:

6 While we recognize it is vital to mitigate the impacts of air pollution, including
7 particulate matter from smoke, this measure restricts the existing agricultural burn program and
8 will likely impact many smaller scale farmers throughout Hawaii who are essential for food
9 production and sustainability in our state.

10 In Hawaii, open burning is generally prohibited with a few exceptions such as cooking,
11 fire training, and agricultural burning with a valid permit. The Department issues agricultural
12 burn permits (AGPs) that are intended for legitimate agricultural operations to burn green waste
13 generated from their agricultural activities. Before issuing these permits, on-site evaluations are
14 conducted to inspect the burn locations and their possible smoke impacts in an effort to mitigate
15 the effects of air pollution on the surrounding community. In order to minimize visible smoke
16 impacts on neighboring properties, schools, and other sensitive areas, these permits contain
17 conditions such as: notification requirements, where and when burning is allowed, what
18 materials can be burned, and other limitations. Special conditions may be added to the permit,

1 such as only allowing burning during early morning hours or in certain wind conditions. The
2 Department's agricultural burning rules also state that a permit can be terminated or suspended if
3 any condition of the permit has been violated or if it is deemed to not be in the best interest of the
4 public.

5 While we encourage farmers to seek alternatives to burning to reduce air pollution, the
6 Department is concerned that many of Hawaii's farmers rely on permitted burning as the most
7 efficient and cost-effective method to dispose of green waste and to control agricultural pests and
8 disease. Municipal green waste pick up is not available in some areas, where without burning as
9 an option, green waste may have to be periodically hauled away at cost to the farmer. Other
10 alternatives such as chipping and mulching would increase costs and composting may not be
11 feasible at large scales. Removing the option of permitted burning could increase the financial
12 burden on small farmers, reduce accessibility of locally grown produce to our communities, and
13 conflict with Hawaii's sustainability goals.

14 Our records show that approximately 92% (86 of the 93) of current AGPs issued may be
15 located nearby or within one thousand feet of a residential property. Locations include Kapolei,
16 Ewa, Waimanalo, Waianae, Kaneohe, Kahuku, Kamuela, Honokaa, and Kula as well as other
17 sites on Oahu and the neighbor islands.

18 Records also show that over the last year, less than 2% (5 of the 265) of the complaints
19 received by the Department were related to agricultural burning. In the previous year, only 1%
20 (3 of 237) of the total number of complaints were related to agricultural burning. Most of the
21 complaints received were resolved by the permittees working with their neighbors and the
22 Department to address concerns by moving the burn pile location, discontinuing the fire, or
23 implementing additional practices (e.g., changing time of burn).

24 Thank you for the opportunity to testify.

25 **Offered Amendments:** None.

JOSH GREEN, M.D.
Governor

SYLVIA LUKE
Lt. Governor



SHARON HURD
Chairperson, Board of Agriculture

MORRIS M. ATTA
Deputy to the Chairperson

State of Hawai'i
DEPARTMENT OF AGRICULTURE
KA 'OIHANA MAHI'AI
1428 South King Street
Honolulu, Hawai'i 96814-2512
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TESTIMONY OF SHARON HURD
CHAIRPERSON, BOARD OF AGRICULTURE

BEFORE THE SENATE COMMITTEES ON AGRICULTURE AND ENVIRONMENT
AND JUDICIARY

WEDNESDAY, FEBRUARY 22, 2023
ROOM 224
1:00 P.M.

SENATE BILL NO. 788
RELATING TO VEGETATIVE BURNING

Chairpersons Gabbard and Rhoads and Members of the Committees:

Thank you for the opportunity to testify on Senate Bill 788. This measure amends Chapter 342B (air pollution control) by prohibiting the Department of Health from issuing permits for commercial burning of green waste products in residential areas or within 1,000 feet of a residential property. The Department of Agriculture (Department) offers a comment.

With respect to the prohibition on the issuance of commercial burning permits for green waste products in areas within 1,000 feet of a residential property, this may affect farming operations on agricultural lands that border residential areas. Farming operations on large lots may be able to move their burning site elsewhere on the property to be in compliance, however farming operations on small lots may be unable to do the same.

It appears that the Right-to-Farm Act (Chapter 165) may not protect farmers from nuisance complaints from non-farming neighbors if the purpose of the prohibition is to "protect to public health, safety, and welfare" (Section 165-2 (Definitions)).

Thank you for the opportunity to testify on this measure.





Environmental Caucus of The Democratic Party of Hawai'i

To: The Honorable Mike Gabbard, Chair
The Honorable Herbert M. "Tim" Richards, Vice Chair
Members of the Committee on Agriculture and Environment

The Honorable Karl Rhoads, Chair
The Honorable Mike Gabbard, Vice Chair
Members of the Committee on Judiciary

Re: **SB 788 – RELATING TO VEGETATIVE BURNING**
Hearing: Wednesday, February 22, 2023, 1:00 p.m., Conference Room 224 & Videoconference

Position: **Strong support**

Aloha, Chairs Gabbard and Rhoads, Vice Chairs Richards and Gabbard, and Members of the Committee on Agriculture and Environment and Committee on Judiciary:

The Environmental Caucus of the Democratic Party of Hawai'i stands in strong support of SB 788. This measure prohibits the Department of Health from issuing permits for commercial burning of green waste products in residential areas or within one thousand feet of a residential property.

The Democratic Party of Hawai'i Platform on the environment provides that its members are to "protect and preserve Hawai'i's environment and achieve energy sustainability, advance measures to re-establish a healthy climate and environment for humans and fellow species, including actions to urgently address climate change, and work towards 100% renewable energy goals.

We believe that all people have the right to live in a clean, healthy and safe environment. We believe that the preservation of our natural environment and its ecological well-being is essential to ensuring a safe, healthy, bountiful life for future generations in Hawai'i. We support policies that create a more sustainable society. We support the restoration, preservation, and protection of native ecosystems.

We believe in the resource management principles outlined in the Public Trust doctrine [in Article XI, Section 1 of] the Hawai'i State Constitution." [OUR PLATFORM | DPH \(hawaiidemocrats.org\)](https://www.hawaiidemocrats.org)

Due to increasing quantities of waste sent to incineration, incinerators will emit more toxins and pollutants that harm local air quality. Incineration makes a more significant negative contribution to local air quality than landfill.

Waste incineration contributes to air pollution and like many other forms of air pollution, it seems toxic fumes from incinerators are likely to affect deprived areas, as well as areas with high populations of people of color the most.



February 22, 2023

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People living near incinerators complain of noise, litter, increased vehicle traffic, smells and air pollution. As temperatures rise in the summer, the smell often gets worse, forcing people to close their windows and avoid sitting outside.

Prohibiting the Department of Health from issuing permits for commercial burning of green waste products in residential areas or within one thousand feet of a residential property is consistent with the state and counties' duties under the Public Trust Doctrine and the DPH Environmental Platform plank that provides that members must protect and preserve Hawai'i's environment, and advance measures to re-establish a healthy climate and environment for humans and fellow species.

Please support and pass this bill.

Mahalo for the opportunity to testify on this measure.

/s/ Melodie Aduja and Alan Burdick

Co-Chairs, Environmental Caucus of the Democratic Party of Hawai'i

SB-788

Submitted on: 2/20/2023 3:41:02 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Derek Kurisu	Testifying for KTA Super Stores	Oppose	Written Testimony Only

Comments:

I am opposing SB788. Small farmers especially on the neighbor islands will be affected. Farmers are facing cost increases and shortage of farm workers. This extra burden of going to the landfill to dispose of their green waste might discourage farmers from farming and increase the cost of locally grown products. Also most farms on the neighbor island were there before any housing development. I am opposed to SB788.

Derek Kurisu



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e-mail info@hfbf.org; www.hfbf.org

February 22, 2023

HEARING BEFORE THE
SENATE COMMITTEE ON AGRICULTURE AND ENVIRONMENT
SENATE COMMITTEE ON JUDICIARY

TESTIMONY ON SB 788
RELATING TO VEGETATIVE BURNING

Conference Room 224 & Via Videoconference
1:00 PM

Aloha Chairs Gabbard and Rhoads, Vice Chair Richards and Gabbard, and Members of the Committees:

I am Brian Miyamoto, Executive Director of the Hawai'i Farm Bureau (HFB). Organized since 1948, the HFB is comprised of 1,800 farm family members statewide and serves as Hawai'i's voice of agriculture to protect, advocate and advance the social, economic, and educational interests of our diverse agricultural community.

The Hawai'i Farm Bureau recognizes the need to ensure that agricultural green waste burning is conducted in a safe and prudent manner and supports the well-established, rigorous permitting system required by the Hawai'i Department of Health. We respectfully oppose SB 788.

We are concerned that the bill will negatively impact smaller farmers who may have no reasonable alternative to using burning as a tool, for example as a means of destroying devastating pests and diseases that can spread throughout the farm and to other properties.

We believe that there are other opportunities to address the goal of this measure without banning agricultural burning altogether for smaller farmers or *farmers whose own residence near their fields* would prohibit them from burning if this measure passes. The department has the authority to and does place conditions on the farmer to limit the effects of burning to the surrounding community. Each permit is customized to restrict when, how, and where a burn can occur, and exactly what is allowed to be burned. Permits may be withdrawn if the conditions are not met or if smoke is not adequately controlled.

The Hawai'i Farm Bureau is willing to work with the legislature and the department to ensure that an agricultural burn permit remains available to farmers while also ensuring that neighbors are not unreasonably affected.

Thank you for the opportunity to provide our comments and thank you for your continued support of Hawai'i's agricultural community.

CARES

COMMUNITY ADVOCACY RESEARCH EDUCATION SERVICES

SB 788

Aloha Chairs, Vice Chairs & the Committee of JDC & AEN

to

the SENATE
committees

on AEN &
JDC.

The Hawaii
State
Legislature

CARES is providing comments for SB 788.

The purpose of this act is to prohibit the DOH from issuing permits for commercial burning of green waste within residential areas as a preventative measure against air pollution as per the Clean Air Act. Green waste, as defined by the City, is green waste that goes in the green cart including: grass clippings, leaves, branches, hedge, trimmings, fruit and vegetable, palm fronds and christmas trees.

from

Zhizi Xiong
(Angela
Melody
Young)
Creator

EPA sets the National Ambient Air Quality Standard for air pollutants. State & local governments that do not meet the EPA standards must develop implementation plans outlining how they will address air pollutant emissions. The Federal Act does not constitute parameters about the specificity of burning "green waste". It just sets a goal about emission standards that we should reach for.

In Missouri's Dept of Natural Resources, their policy is that open burning of green waste is allowed without an air curtain incinerator if the burning takes place outside the city limits. Missouri allows open burning of yard waste from sites provided it originates and is burned on the premises. Florida allows recreational open burning of vegetative as long as the fire is attended at all times and completely extinguished before leaving the premises unattended. Prior to conducting the open burning, the person responsible for the burn contacts the Florida Forest Service regarding the planned burning activity.

CARES

It seems that policies about this subject matter of burning green waste varies from jurisdiction to jurisdiction. SB 788 prohibits commercial burning in residential areas. CARES would like to advise that schools should be considered for this measure so that students are not breathing in air pollutants that are bad for them.

The measure does not clarify if the “fine particulates” is PM 2.5, Fine Particulate Matter, the scientific name. It’d be helpful to know what was the author’s intention when writing this policy. Because if it is to address the specific pollutant PM2.5, it’d be helpful to include the scientific name in the policy to better regulate it. The EPA regulates air pollutants & toxins by referring to the scientific name so that it can collect accurate data about which toxins or pollutants are causing harmful levels to our health. Generally, PM 2.5 is the specific air pollutant that is being referred to when talking about air quality. A key indicator of air quality is PM 2.5 in the air. People who are sensitive to air pollutants may experience symptoms when this level is too high. PM stands for particulate matter and the 2.5 refers to size.

The Environment Protection Authority from Australia is the world's third oldest environmental regulatory agency. Australia’s EPA has a website to monitor air quality. Every citizen at any given time can go to the website and it will tell you what the air quality is like in your area because it constantly measures the PM 2.5 in the air. The US’s EPA Air Quality System assesses Air Quality of each city by it is not a constant & consistent monitoring system like Australia's. CARES has included a chart from the US EPA which will show the report from Honolulu and our City’s PM 2.5 statistics. CARES has also included the national average PM 2.5 trend from EPA. Everyone has a responsibility to identify and minimize the risks that their activities present to the environment and to our communities. We should prioritize better air quality as a community to shape a bright new future.

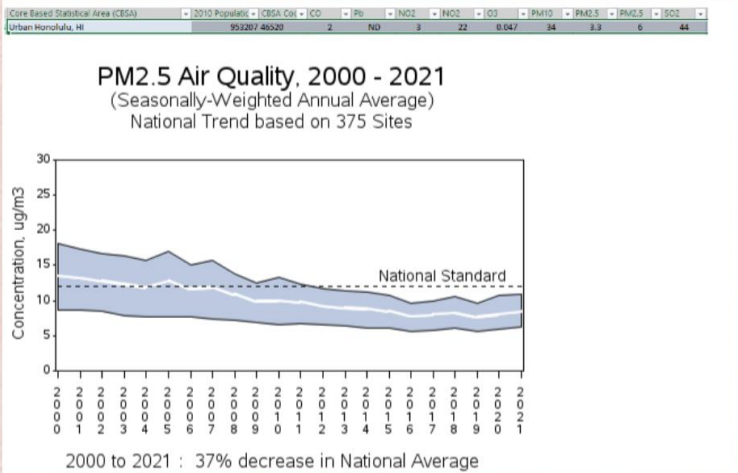
Thank you for the opportunity to testify.

Blessings,



ANGELA MELODY YOUNG


CARES





CARES

Works cited

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 4. U.S. EPA. "Summary of the Clean Air Act | US EPA." US EPA, 15 Aug. 2018, www.epa.gov/laws-regulations/summary-clean-air-act.
 5. "PM2.5 and Your Health." Wwww.youtube.com, www.youtube.com/watch?v=nDCHMyNOjHM. Accessed 22 Feb. 2023.
 6. US EPA,OAR. "Air Quality - Cities and Counties | US EPA." US EPA, 4 May 2016, www.epa.gov/air-trends/air-quality-cities-and-counties.
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SB-788

Submitted on: 2/17/2023 8:46:08 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Dana Keawe	Individual	Support	Written Testimony Only

Comments:

support

SB-788

Submitted on: 2/18/2023 12:21:57 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
B.A. McClintock	Individual	Support	Written Testimony Only

Comments:

I can't believe there's no law already on the books for this. Please support this important bill.
Mahalo.

SB-788

Submitted on: 2/19/2023 8:04:50 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
aulii fernandez	Individual	Oppose	Written Testimony Only

Comments:

oppose

SB-788

Submitted on: 2/19/2023 8:05:40 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Alika Maikui	Individual	Oppose	Written Testimony Only

Comments:

OPPOSE

SB-788

Submitted on: 2/19/2023 8:06:58 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Beatrice Cabral	Individual	Oppose	Written Testimony Only

Comments:

Oppose.

Mahalo!

SB-788

Submitted on: 2/19/2023 8:13:23 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Aulani Hood	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill.

Thank you.

SB-788

Submitted on: 2/19/2023 5:46:40 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Keola Gorospe	Individual	Oppose	Written Testimony Only

Comments:

I oppose SB2617.

SB2617 has negative impact against hundreds of local middle class jobs. Also this bill has unintended consequences and conflicts with federal, state and county laws.

I do not support SB2617.

SB-788

Submitted on: 2/20/2023 8:12:29 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Keoni Pikini	Individual	Oppose	Written Testimony Only

Comments:

Aloha, I 100% oppose this bill. I believe this bill would be detrimental to ridding invasive trees(albezia, gunpower, strawberry guava,goss etc..) it would be impossible if this bill was to be passed. Local farmers and agricultural businesses rely on the process to produce crops and or eliminate "bad" crops at a affordable rate for consumers! Stop creating these obstacles for the very hard working people that ultimately feed our families! Substituting burning vegetation(locally) for having people/businesses haul(in vehicles) there green waste to a county facility to be processed by machines that all creating carbon emissions while creating NO BENFIT to anyone and only inconveniencing everyone is pure ignorance! What are we really accomplishing?!?...Bill sb788 is Ignorant and anyone supporting this bill is too!

SB-788

Submitted on: 2/20/2023 6:41:48 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Jeffery Malavong	Individual	Oppose	Written Testimony Only

Comments:

Hawaii's farmers rely on permitted burning as the most efficient and cost-effective method to dispose of green waste and to control agricultural pests and disease. The State and Department of Health already have strict rules in place to regulate air quality that comply with EPA laws. This bill will conflict with those existing laws.

SB-788

Submitted on: 2/20/2023 6:44:59 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Ray Tanonaka	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill as it will have a negative effect on local farmers and community members. Also it will have cultural impacts as many cultures cook while using vegetation.

SB-788

Submitted on: 2/21/2023 8:42:39 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Elmer	Individual	Oppose	Written Testimony Only

Comments:

Aloha,

I'm writing this testimony strongly in opposition of bill SB788 as this bill would potentially eliminate lots of good paying jobs.

SB-788

Submitted on: 2/21/2023 8:56:09 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Michael B Dela Cruz	Individual	Oppose	Written Testimony Only

Comments:

I oppose this bill, strong and firm as we are here to protect jobs in Hawaii and local farmers

SB-788

Submitted on: 2/21/2023 8:59:42 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Roselyn Molina	Individual	Oppose	Written Testimony Only

Comments:

I strongly oppose this bill and absolutely do not want this to bill to pass. It will negatively impact the future of our state, and our working Family.

SB-788

Submitted on: 2/21/2023 9:30:54 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Colleen	Individual	Oppose	Written Testimony Only

Comments:

I opposing bill SB788

SB-788

Submitted on: 2/21/2023 11:47:19 AM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Jennifer Yadao	Individual	Oppose	Written Testimony Only

Comments:

I oppose the bill.

SB-788

Submitted on: 2/21/2023 12:01:10 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Kevin McCord	Individual	Oppose	Written Testimony Only

Comments:

I am a farmer in Kula, HI. I believe that this outright ban on agricultural burning in certain areas, including agriculturally zoned areas, will hurt farmers. The public supports local agriculture. Farming has always been a big part of our rural communities and the state is trying to encourage more farming, not less.

Agricultural burning is already highly regulated and requires a Department of Health permit with conditions for safety and health concerns, including those to reduce the impact to neighbors. Part of those conditions include the immediate extinguishing of the burn if smoke is having an impact on a residence.

If farmers are not allowed to burn green waste, it will have to be disposed of in another way and there may not be another way that is practical or cost-effective.

In some cases, the material to be burned cannot be moved from the farm to a location that is accessible to a roadway. And not every community has green waste pick-up. This can mean for me well over an hour round trip every time I make the trip to the green waste disposal at the landfill, and I have to make sure to time the trip right to go within the limited hours of operation. This costs time, money, adds to traffic, and uses extra fuel. And for some farmers, it may be much further away from their farms, or the sites may have even more limited hours of operation.

The general public is normally not allowed to burn green waste but the need for farmers to burn was recognized as a necessity and is allowed only by a site review and permit. Many non-farmers illegally burn green waste and even rubbish, or dump it on the side of the road because they went to the landfill and it was closed. Dumping in gulches could become a more serious problem without the ability for farmers to burn green waste and this could block water flow and cause serious flooding, as we experienced in 2020's Kona Low. Please support local farmers by allowing them to obtain permits to burn green waste when needed, under the Department of Health strict regulations. Thank you.

Committee on Agriculture and Environment/ Committee on Judiciary
Wednesday, February 22, 2023
1:00 PM
Conference Room 224 and Videoconference
SB788

Chair Gabbard, Chair Rhoads, Vice Chair Richards, Vice Chair Gabbard and Members of the Senate Committees on Agriculture and the Environment and on Judiciary

I am submitting this testimony in opposition to SB 788 for several reasons.

My name is Scott Sevadjian, a 13-year resident of Ewa Beach, Hawaii. I have 19 years of professional experience in air-quality analysis, which includes academic research of greenhouse gasses, air emissions modeling, environmental impact assessment, and working with the Hawaii Department of Health, Clean Air Branch, to support clients in the preparation of air permit applications to ensure compliance with all applicable air quality regulations.

Flawed preamble and purpose of the bill

The premise for this measure, as set forth in Section 1, explaining the findings and purpose, is deeply flawed. For example, the claim that commercial burning of organic materials is an exceptional case deserving a special regulatory statute flies in the face of accepted best practices for regulating air quality. Regulations to protect the public from all types of air pollution already exist, not just those resulting from the commercial burning of organic materials.

Environmental Protection Agency and Dept of Health already have regulations

These existing regulations are overseen by several regulatory agencies, including the U.S. Environmental Protection Agency, as well as the State Department of Health and individual counties.

Science determines requirements for air emissions compliance

Harmful pollution is already regulated scientifically by determining the types of gases emitted, size fraction of particulates, and quantity of emissions. These characteristics are the basis for issuing air permits. Air permits issued by the state already evaluate the environmental and human health impacts of all facilities by calculating and rigorously modeling the types and amounts of potentially harmful substances in their emissions. It's not the type of facility, what is being combusted, or process that determines its safety or environmental impact; it's the characteristics of its emissions. The purpose of the extensive regulation is to ensure commercial operations meet air quality standards consistently, instead of regulating each type of facility producing emissions on a piecemeal indiscriminate basis.

The criteria in this bill are unscientific and arbitrary

Setting 1,000 feet as a setback for organic waste combustion is completely arbitrary and has no basis in scientific fact. There are no studies that show the rationale for selecting this number. Adopting the provisions of this measure will circumvent existing laws, rules, and regulations at the federal, state and county level, which are based on science.

Unintended Consequences

There are numerous other completely legitimate activities, commercial and private, that would be precluded by this legislation. The unintended consequences of this legislation would be significant.

There is no rationale to discriminate against organic waste, while providing a carveout for coffee roasting. Particulates are created when *any* substance is burned, including food, kiawe and hickory for barbeques, or fuel in cars, trucks, and airplanes. Any permits issued by government agencies follow strict EPA and DOH standards.

For these reasons, I strongly urge that this measure be held.

Mahalo for the opportunity to testify on this flawed piece of legislation.

Respectfully,

A handwritten signature in cursive script, appearing to read "S. Sevadjian".

Scott Sevadjian
Ewa Beach, HI

SB-788

Submitted on: 2/21/2023 10:00:39 PM

Testimony for AEN on 2/22/2023 1:00:00 PM

Submitted By	Organization	Testifier Position	Testify
Kelvin P Jarneski	Individual	Oppose	Written Testimony Only

Comments:

I am a small family farmer on the Big Island, and I have an agricultural burn permit. I only use it several times a year when necessary and I only burn during favorable conditions. When I apply for the burn permit, there is a site inspection by the Department of Health and the fire department. This bill would keep me from being able to get a burn permit, making it harder for me to maintain my farm. The other options available are: 1. Rent a container to load green waste, which is a considerable expense, or 2. Haul multiple loads to the rubbish dump green waste disposal site, which would take days. Please don't pass this bill that would hurt small farmers like me