Written Testimony Presented Before the
House Committees on Water, Land and Ocean Resources,
Energy and Environmental Protection, and Agriculture
Monday, January 30, 2012 at 9:00 a.m.

by
Virginia S. Hinshaw, Chancellor
and
Susan Chandler, Director
Public Policy Center
College of Social Sciences
University of Hawai'i at Mānoa

H.B. 2671 Relating to Sustainability

Chairs Chang, Coffman, Tsuji and honorable members, thank you for the opportunity to testify in support of HB 2671, relating to sustainability. I am the director of the Social Sciences Public Policy Center ("Center") at the University of Hawai'i at Mānoa and, along with Dr. Sharon Moriwaki, have been working on the Hawaii 2050 Sustainability Plan ("H2050 Plan") and its updates; and, more specifically, the report as directed by Act 181 (2011). As a result of your support last session, Act 181 codified sustainability goals, definitions and guidelines into state law (the Hawai'i State Planning Act) and also directed the Center, in consultation with the Office of Planning ("OP"), to identify the states progress in implementing the sustainability guidelines and to submit a report ("Act 181 Report") with recommendations for facilitating their full implementation.

We strongly support H.B. 2671, which seeks to implement the recommendations from the Act 181 Report. More specifically, it directs the OP to: (1) convene a working group of government, nonprofit, education, business and other interested organizations to establish guidelines for a public-private "Hawai'i Statewide Sustainability Partnership"; (2) determine key indicators for measuring sustainability and establishing benchmarks for measuring progress; (3) translating the sustainability principles into clear objectives, specific actions and accountability measures; and (4) coordinating progress among the state and counties. It further requests an appropriation to enable the Office of Planning to obtain services to accomplish effectively these major responsibilities to design and establish an ongoing, coordinated program and network, including a set of accountability measures of progress.

The Center and the OP, together with the sustainability/environmental coordinators from the counties of Maui, Hawai'i, and Kaua'i and community organizations, such as Kanu and Hawai'i Green Growth Initiative/Global Island Partnership, identified the programs and efforts throughout the state; they also obtained further input from a community survey of organizations and individuals interested in and conducting work in sustainability. We found that major progress has been made by each of the counties. Hawai'i and Kaua'i counties have adopted sustainability plans. The City and County of Honolulu and Hawai'i and Kaua'i counties have established a sustainability coordinator or manager position and Maui County has an environmental coordinator. The State is committed to implementing Act 181 across its agencies, with OPs support and coordination through its administration of the Hawai'i State Plan. In addition, the State has a number of initiatives that are

advancing the sustainability goals, such as: (1) the State Energy Office Hawai'i Clean Energy Initiative to achieve energy independence; (2) the Department of Land and Natural Resources The Rain Follows the Forest Plan, which seeks to ensure mauka watersheds are fully functioning to ensure fresh water resources for Hawaii's people; (3) the Office of Planning collaboration with public, private, and community stakeholders worked to update the Hawai'i Ocean Resources Management Plan to facilitate comprehensive ocean resources management throughout the State. The University of Hawai'i has also provided leadership among its campuses in engaging faculty, staff and students in classes, programs, research and projects to reduce fossil fuel use, promoting energy efficiency and renewable energy technologies.

Community organizations have also continued efforts to advance sustainable principles and practices. Eighty-eight organizations and/or individuals responded to the community survey and an overwhelming majority are involved in activities advancing the seven sustainability guidelines and principles, ranging from the highest involvement in planning that respects and promotes living within the natural resources and limits of the State (88%), followed by encouraging balanced economic, social, community and environmental priorities and encouraging respect for the host culture (84%); promoting decisions based on meeting the needs of the present without compromising the needs of future generations and emphasizing that everyone has the responsibility for achieving a sustainable Hawai'i (83%); promoting a diversified and dynamic economy (70%) with 60% working on increasing the competitiveness of Hawaii's workforce; and considering the principles of the ahupua'a system in decision making (67%). Organizations involved in implementing the sustainability principles were primarily represented by the non-profit (37%), government (20%), education (17%), and business (16%) sectors.

The Center found that while there are a number of diverse efforts across the sate, there was overwhelming agreement by county, state and community representatives that there is need for establishing a statewide network of state, county, private, and community organizations if we truly are to fully implement sustainability goals and guidelines – there is need for continuing collaboration, action, and accountability. It is therefore critical that a working group, as proposed in HB 2671, be convened to establish the Hawai'i Statewide Sustainability Partnership to fully implement the sustainability goals and principles envisioned in the H2050 Plan and Act 181. It is further recommended that the state and counties provide leadership support, which should include funding of the Partnership (for staff, travel for neighbor island members, and communication, including website development and maintenance) and participation by its various agencies and, in particular, the development of statewide measures of accountability and benchmarks to measure progress in the near and long term. As importantly, the OP and representatives from the several counties have agreed to work together on long-range planning, including updating the inventory of sustainability activities and developing sustainability indicators and translating the Act 181 sustainability principles into clear objectives, specific actions, and accountability measures.

Based on the foregoing, the University of Hawai'i strongly supports HB 2671, including the needed funding for the Office of Planning to enable it to fulfill the recommendations as set forth in HB 2671.

Thank you for the opportunity to testify. I will be happy to answer any questions.



State of Hawaii DEPARTMENT OF AGRICULTURE 1428 South King Street

Honolulu, Hawaii 96814-2512 Phone: (808) 973-9600 FAX: (808) 973-9613

TESTIMONY OF RUSSELL S. KOKUBUN CHAIRPERSON, BOARD OF AGRICULTURE

BEFORE THE HOUSE COMMITTEES ON WATER, LAND, AND OCEAN RESOURCES; ENERGY AND ENVIRONMENTAL PROTECTION; AND AGRICULTURE

MONDAY, JANUARY 30, 2012

9:00 a.m.
Room 325

HOUSE BILL NO. 2674 RELATING TO SUSTAINABILITY

Chairpersons Chang, Coffman, and Tsuji and Members of the Committees:

Thank you for the opportunity to testify on House Bill No. 2671 that seeks to have the Office of Planning convene a working group to establish guidelines for the Hawaii statewide sustainability partnership develop indicators and benchmarks to measure progress in achieving sustainability principles; and coordinate sustainability efforts between the state and Counties.

The Department supports HB 2671 and looks forward to participating with the working group on the department's efforts to assist the State in achieving greater food security, but would defer to the Office of Planning for guidance.

Thank you for the opportunity to submit testimony.





DEPARTMENT OF BUSINESS, ECONOMIC DEVELOPMENT & TOURISM

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Statement of JESSE K. SOUKI

Director, Office of Planning
Department of Business, Economic Development, and Tourism
before the

HOUSE COMMITTEE ON WATER, LAND, AND OCEAN RESOURCES, HOUSE COMMITTEE ON ENERGY AND ENVIRONMENTAL PROTECTION, AND

HOUSE COMMITTEE ON AGRICULTURE

Monday, January 30, 2012 9:00 AM State Capitol, Conference Room 325

in consideration of HB 2671 RELATING TO SUSTAINABILITY.

Chairs Chang, Coffman and Tsuji, Vice Chairs Har, Kawakami and Hashem, and Members of the House Committees on Water, Land, and Ocean Resources, Energy and Environmental Protection, and Agriculture.

The Office of Planning (OP) supports H.B. 2671 Relating to Sustainability provided that its passage does not replace or adversely impact priorities as indicated in the Executive Budget. The Office of Planning has been collaborating with the University of Hawaii Public Policy Center on their report on progress made in implementing sustainability guidelines and principles set forth in the Hawaii State Plan pursuant to Act 181 enacted last year. OP is supportive of efforts to implement sustainability but has human and fiscal constraints due to budget reductions incurred since FY09.

Thank you for the opportunity to testify.



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OFFICE OF THE MAYOR

Ke'ena O Ka Meja COUNTY OF MAUI – Kalana O Maui

January 27, 2012

House of Representatives
The Twenty-Sixth Legislature
Committee on Water, Land, & Ocean Resources
Committee on Energy & Environmental Protection
Committee on Agriculture
State Capitol
415 South Beretania Street
Honolülu, Hawaii 96813

Aloha Chairs and Members of the Committees:

RE: SUPPORT FOR HB 2671, RELATING TO SUSTAINABILITY

The office of Mayor Alan Arakawa wishes to strongly support House Bill 2671, Relating to Sustainability. In 2005 and 2006 as Maui County Environmental Coordinator, I participated in the master planning process to develop the Hawaii 2050 Sustainability Plan. Over the past few months, I've worked with University of Hawaii Public Policy Center and the State Office of Planning, providing input for the report that was submitted to this legislature, Pursuant to Act 181.

The United Nations 1987 manifesto, "Our Common Future" stated our global imperative to, "meet the needs of the present without compromising needs of the future," as a guiding principle. Sustainability goals lead us to a thriving economy and help us reduce the costs of government, according to a nationwide study by the National Association of Counties.

Mayor Alan Arakawa has put forth a proposal to the Maul County Charter Commission to establish greater focus on sustainability and environmental protection for Maul County. We believe to reach our state-wide sustainability goals, we will need to take the steps that are delineated in this Bill, providing the resources and funding to achieve the recommendations, benchmarks, and goals set forth in the Hawaii 2050 Sustainability Plan.

()

Rob Parsons

Environmental Coordinator

Bernard P. Carvalho, Jr. Mayor



Gary K. Heu Managing Director

OFFICE OF ECONOMIC DEVELOPMENT

County of Kaua'i, State of Hawai'i

4444 Rice Street, Suite 200, Līhu'e, Hawai'i 96766 TEL (808) 241-4946 FAX (808) 241-6399

TESTIMONY OF GLENN SATO, SUSTAINABILITY MANAGER, COUNTY OF KAUAI

BEFORE A HEARING OF THE JOINT COMMITTEES OF WATER, LAND AND OCEAN RESOURCES; ENERGY AND ENVIRONMENTAL PROTECTION AND AGRICULTURE

> Monday, January 30, 2012 Conference Room 325 9:00 a.m.

HOUSE BILL 2671 RELATING TO SUSTAINABILITY

I strongly support H.B. 2671 which seeks to implement the recommendations made by the University of Hawai'i public policy center in response to Act 181, Session Laws of Hawai'i 2011.

The County participated in formulating these recommendations, which will help to implement the sustainability guidelines and principles set forth in Act. 181.

A Hawai'i statewide partnership convened under the Office of Planning will allow for the collaborative development of guidelines and coordinated establishment of key indicators for measuring sustainability both in the short-term and long term.

The County hopes to actively participate as a member of the working group in this effort and would be willing to share our data collection and analysis of accountability measures. We are currently collecting and processing data to establish a carbon emissions inventory of county operations and hope to have an active data base established by year's end, along with an action plan to improve sustainability within county operations.

I request your favorable consideration and support of H.B. 2671.

Mahalo,

Glen Sato

TO: WLOtestimony@capitol.hawaii.gov

This testimony pertains to the hearing on 30 January 2012 of H.B. 2671, which recommends that the Hawaii Office of Planning (OP) convene a working group to establish a *Hawaii Statewide Sustainability Partnership* and provide funding to enable the OP to implement the recommendations contained in Act 181.

Testifier's name, position, title and	Peter Heffron, Principal
organization:	Best Practice Planning
,	95 West Naauao Street
	Hilo, HI 96720
	peter.heffron@gmail.com
	(808) 934-0527
Committees comments directed to:	House Committees on:
	 Water, Land & Ocean Resources
	Energy & Environmental Protection
	Agriculture
·	
Date and time of hearing:	30 January 2012 9 AM
Measure number:	H.B. 2671
Number of copies Committee is requesting:	4
Hearing location:	Conference Room 325
,	State Capitol
	415 South Beretania Street
	Honolulu, HI

TESTIMONY

Mahalo esteemed House Committee members, public participants, and others for considering my testimony in support—and enhancement—of H.B. 2671, which is before you today.

Background

I have been actively engaged on a voluntary basis in the Hawaii 2050 planning process since 2007. In that year I submitted a comprehensive set of recommendations for consideration in the then draft *Hawaii 2050 Sustainability Plan*—and beyond. Those recommendations were submitted to the *Hawai'i 2050 Sustainability Task Force* c/o Office of the Auditor, Honolulu; *Russell S. Kokubun*, Hawai'i State Senator and Chair, Hawai'i 2050

HB 2671 TESTIMONY FROM PETER HEFFRON, BEST PRACTICE PLANNING, HILO, HAWAII 30 JAN 2012

Sustainability Task Force; and others.¹ Because my key 2007 recommendations still apply in 2012, I'm sending the original recommendations paper to the H.B. 2671 Committee for reference, in addition to this testimony. My recommendations paper can also be accessed through this link:

https://skydrive.live.com/redir.aspx?cid=e1cfeda324eb4fbe&resid=E1CFEDA324EB4FBE!140&parid=E1CFEDA324EB4FBE!104&authkey=!AKa13n8oaz8uu1E

Observations

The State of Hawaii is commended for having a sustainability plan and for building on the initial plan to achieve a more sustainable and equitable island society based on what the plan calls a 'triple bottom line' of social-cultural, economic, and environmental measures.

The greatest strength in the current *Hawaii 2050 Sustainability Plan* is that it was prepared with input from a broad cross-section of Hawaiian society.

The greatest weakness in the current *Hawaii 2050 Sustainability Plan* is that it attempts to appease too many constituents and does not realistically address the social-cultural, economic, and especially environmental trends—and their rates of change—affecting Hawaii over time.

Unless steps are taken to tackle this weakness, the outcomes of the *Hawaii 2050 Sustainability Plan* will, unfortunately, very likely prove to be "too little, too late" relative to the powerful "triple bottom line"—trends mentioned above. Recommended steps follow.

Recommendations

- 1. Approve the HB 2671 Recommendations, summarized below:
 - 1.1. "Hawaii Statewide Sustainability Partnership: Convene a statewide network of state, county, private sector and community organizations that are recognized trailblazers in sustainability (e.g. Kauai Planning and Action Alliance (KPAA), Kanu Hawaii, the Hawaiii Green Growth Initiative (HGG) and others); and establish an organization The Hawaiii Statewide Sustainability Partnership to advance collaboration, action, and accountability to fully implement the Hawaiii sustainability goals and principles."
 - 1.2. "Hawai'i Sustainability Indicators: Appropriate funds to the Office of Planning to support development of statewide sustainability measures of accountability, including benchmarks, indicators, data and data sources."
- 2. Require the Hawai'i Statewide Sustainability Partnership to give priority to the following activities, and to report its results to this Committee by December 2012:

¹ Recommendations: Hawai'i 2050 Sustainability Plan, Including the Legislative Review and Startup Phases by Peter Heffron, Best Practice Planning, Hilo, Hawaii, 2007.

2.1. Identify **Hawaii's carrying capacity and footprint trends** relative to its carrying capacity (county level aggregated to state level). Graph from 1950 to 2050. Engage experts experienced in Footprint Analysis.²

Note that this issue is mentioned in the current Hawaii 2050 Plan:

Furthermore, no discussion of Hawai'i's future would be complete without addressing the most basic question we have in our island state: What is our carrying capacity? We anticipate thousands of new homes coming online, tens of thousands of additional residents to move here, millions of tourists every year, and yet no serious look at our overall capacity has been undertaken recently.

- 2.2. Develop an integrated **systems model** of Hawaii (county level aggregated to state level) based on the *Limits to Growth* ('World-3') model,³ or any other reputable, appropriate, systems model the Sustainability Partnership considers valid. Ensure that the model is developed in a transparent, participatory, visually intelligible⁴ manner facilitated by experts experienced in sustainability systems modeling.
- 2.3. After validating the preceding model, use it to help develop 'Worst,' 'Middle,' and 'Best Case' scenarios based on a risk analysis of possible policy, environmental (including sea-level rise, tsunamis, etc.), economic, and social events. (See the Limits to Growth scenario examples.)
- 2.4. After validating the Hawaii model scenarios, adjust the Hawaii 2050 goals, strategies, and indicators as appropriate.

Resources/Additional Information

The preceding recommendations are included in greater depth in my 2007 paper, *Recommendations: Hawai'i 2050 Sustainability Plan.* In addition, the paper includes references for -and links to- additional information.

Please feel free to contact me if clarifications are desired.

Good luck in your deliberations.

Sincerely,

Peter Heffron Best Practice Planning

² Ref: www.footprintnetwork.org/en/index.php/GFN/

³ Limits to Growth: The 30-Year Update, by Donella Meadows, Dennis Meadows, Jørgen Randers, 2004: www.chelseagreen.com/bookstore/item/limitspaper

⁴ The World-3 model in *Limits to Growth* was converted to STELLA, a computer simulation program that enables visualization of model behaviour over time (stocks, flows, feedback loops, delays, etc.). Ref: www.iseesystems.com

HB 2671 TESTIMONY FROM PETER HEFFRON, BEST PRACTICE PLANNING, HILO, HAWAII 30 JAN 2012

cc: Sharon Y (Miyashiro) Moriwaki, Associate Director, Social Sciences Public Policy Center Cochair, Hawaii Energy Policy Forum, University of Hawaii at Manoa (sharonmi@hawaii.edu)

Testimony in Support of HB 2671, Relating to Sustainability Committees on Water, Land & Ocean Resources, Higher Education, & Agriculture

Public Hearing on 30 January 2012, Conference Room 325, 9am

Audrey Newman
Senior Advisor, Global Island Partnership
P.O. Box 535
Hoolehua, Hawai`i 96729

Aloha Chairs and Committee Members:

Thank you for this opportunity to address all three of your committees on this important bill to help us work together and achieve Hawai'i's critical sustainability targets.

My name is Audrey Newman and I am writing on behalf of the Hawaii Green Growth Initiative in support of House Bill 2671. The Hawai'i Green Growth Initiative brings leaders from energy, food and the environment together to achieve Hawaii's sustainability goals and to be a model for building a green economy.

We ask you to support HB 2671 and the leadership role assigned to the Office of Planning. In particular, we ask your Committees to strongly support three key elements in HB 2671:

- A statewide Hawai'i Sustainability Partnership to coordinate and promote action across the many sectors and levels of government working for sustainability in Hawaii. The bill calls for a representative working group to guide the development of this partnership (Section 2(a)(1)). This approach has proven successful in other situations.
- 2. Practical, cost-effective accountability measures and reporting, so public and private stakeholders can track progress on Hawai'i's clean energy, food security, natural resource management and other sustainability targets. (Sections 2(a)(2) & 2(a)(4)).
- 3. Contracting authority and financial support to the Office of Planning to implement these important actions (Sections 2(b), 2(c) and 3)

For clarity, the Committee could amend Section 2(b) to read "The office of planning may contract for a coordinator or facilitator <u>and for technical assistance</u> to implement this Act..." Developing cost-effective indicators, benchmarks, etc often benefits greatly from specialized expertise that a coordinator or facilitator may not have.

Many of our Working Group members actively participated with the UH Public Policy Center in the development of these recommendations and are ready to share their experience with other highly effective cross-sector partnerships in Hawai'i. We look forward to continue working with the State, Counties and others in these important steps to build a more sustainable and secure economy in Hawai'i.

I am traveling on business and regret I cannot testify in person.

Mahalo nui for your time and consideration,

Audrey Newman

Senior Advisor,

Global Island Partnership (GLISPA)

Promoting action for island conservation and sustainable livelihoods.

www.glispa.org



Testimony to the House Committees on Water, Land & Ocean Resources, Energy & Environmental Protection and Agriculture Monday, January 30, 2012 9:00 a.m. State Capitol - Conference Room 325

RE: HOUSE BILL NO. 2671 RELATING TO SUSTAINABILITY

Chairs Chang, Coffman and Tsuji, Vice Chairs Har, Kawakami and Hashem, and members of the committees:

The Chamber of Commerce of Hawaii ("The Chamber") respectfully recommends that the bill be amended to ensure that there is a balanced representation on the working group representative of the economic, social, community and environmental priorities being discussed.

The Chamber is the largest business organization in Hawaii, representing more than 1,000 businesses. Approximately 80% of our members are small businesses with less than 20 employees. As the "Voice of Business" in Hawaii, the organization works on behalf of its members, which employ more than 200,000 individuals, to improve the state's economic climate and to foster positive action on issues of common concern.

The Chamber has the following comments on H.B. No. 2671 which proposes to require the office of planning to convene a workgroup for sustainability guidelines, establish benchmarks for measuring sustainability progress, and coordinate sustainability progress made by the State and counties. It also authorizes the office of planning to contract for a coordinator or facilitator.

Our understanding is that pursuant to Act 181, Session Laws of Hawaii 2011, the University of Hawaii public policy center, in consultation with the office of planning, submitted a report to the legislature identifying the progress made in implementing the sustainability guidelines and principles, as set forth in Act 181, and making recommendations for legislation or other action to facilitate their full implementation.

The bill provides for the office of planning to convene a working group of government, non-profit, education, business and other interested organizations to establish guidelines for the Hawaii Statewide sustainability partnership in implementing implement the recommendations made by the University of Hawaii public policy center in response to Act 181, Session Laws of Hawaii 2011.

Thank you for this opportunity to express our views.



The Nature Conservancy of Hawai'i 923 Nu'uanu Avenue Honolulu, Hawai'i 96817 Tel (808) 537-4508 Fax (808) 545-2019 nature.org/hawaii

Testimony of The Nature Conservancy of Hawai'i
Supporting on H.B. 2671 Relating to Sustainability
House Committee on Water, Land and Ocean Resources
House Committee on Energy and Environmental Protections
House Committee on Agriculture
Monday, January 30, 2012, 9:00AM, Rm. 325

The Nature Conservancy of Hawai'i is a private non-profit conservation organization dedicated to the preservation of Hawaii's native plants, animals, and ecosystems. The Conservancy has helped to protect nearly 200,000 acres of natural lands for native species in Hawai'i. Today, we actively manage more than 32,000 acres in 11 nature preserves on Maui, Hawai'i, Moloka'i, Lāna'i, and Kaua'i. We also work closely with government agencies, private parties and communities on cooperative land and marine management projects.

The Nature Conservancy of Hawai'i supports H.B. 2671 Relating to Sustainability.

The health of Hawaii's unique but threatened natural resources directly affects our economy and quality of life. Residents and visitors alike are awed and inspired by the Hawaiian Islands' natural wonders. Beyond breathtaking beauty, these resources provide essential natural benefits that make life possible in the middle of the vast Pacific Ocean. From native forests that give us fresh water, erosion control, and cultural treasures, to abundant coral reefs that provide food, recreation, and protection from storms, we all depend daily on nature to sustain us. Now more than ever in the past, we have come to appreciate the importance of balancing environmental protection with the obvious need to maintain a vibrant economy that supports and does not threaten the needs of future generations.

The Hawai'i 2050 sustainability plan provides a strong and defined foundation for sustainability to help lead us toward the Hawai'i we all want for ourselves and future generations. We were pleased last year to support the inclusion of the 2050 plan's guiding principles and goals into the Hawai'i State Planning Act. Now, H.B. 2671 takes the logical next step of setting up a process to develop indicators and benchmarks for measuring our progress, and to coordinate activities, data collection and reporting on the goals we have set. We look forward to being a part of that process and success in our area of expertise related to the natural environment of these islands.

BOARD OF TRUSTEES

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har2-Samantha

From: Sent: mailinglist@capitol.hawaii.gov

To:

Friday, January 27, 2012 3:47 PM WLOtestimony

Cc: Subject: chad@chaddeal.com Testimony for HB2671 on 1/30/2012 9:00:00 AM

Testimony for WLO/EEP/AGR 1/30/2012 9:00:00 AM HB2671

Conference room: 325

Testifier position: Support Testifier will be present: No

Submitted by: Chad Deal Organization: Individual E-mail: chad@chaddeal.com Submitted on: 1/27/2012

Comments:

A step in the right direction.

har2-Samantha

From:

mailinglist@capitol.hawaii.gov

Sent:

Saturday, January 28, 2012 9:12 AM

To:

WLOtestimony

Cc:

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Subject:

Testimony for HB2671 on 1/30/2012 9:00:00 AM

Testimony for WLO/EEP/AGR 1/30/2012 9:00:00 AM HB2671

Conference room: 325

Testifier position: Support Testifier will be present: No Submitted by: Carl Paoo Jellings

Organization: Individual

E-mail: mjellings@hawaii.rr.com

Submitted on: 1/28/2012

Comments: In Support

Carl P Jellings Sr

har2-Samantha

From:

mailinglist@capitol.hawaii.gov

Sent:

Sunday, January 29, 2012 7:50 AM

To:

WLOtestimony

Cc: Subject: asantoro@hawaii.rr.com Testimony for HB2671 on 1/30/2012 9:00:00 AM

Testimony for WLO/EEP/AGR 1/30/2012 9:00:00 AM HB2671

Conference room: 325 Testifier position:

Testifier will be present: No

Submitted by: Al Santoro Organization: Individual

E-mail: <u>asantoro@hawaii.rr.com</u>

Submitted on: 1/29/2012

Comments: