DAVID Y. IGE GOVERNOR OF HAWAII





SUZANNE D. CASE CHAIRPERSON BOARD OF LAND AND NATURAL RESOURCES COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA

M. KALEO MANUEL DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES BOATING AND OCEAN RECREATION BUREAU OF CONVEY ANCES COMMISSION ON WATER RESOURCE MANAGEMENT CONSERVATION AND COASTAL LANDS CONSERVATION AND RESOURCES ENFORCEMENT ENGINEERING FORESTRY AND WILDLIFE HISTORIC PRESERVATION KAHOOLAWE ISLAND RESERVE COMMISSION LAND STATE PARKS

STATE OF HAWAII DEPARTMENT OF LAND AND NATURAL RESOURCES

> OFFICE OF CONSERVATION AND COASTAL LANDS POST OFFICE BOX 621 HONOLULU, HAWAII 96809

> > Testimony of SUZANNE D. CASE Chairperson

Before the House Committee on FINANCE

Thursday, March 31, 2022 1:30 p.m. State Capitol, Conference Room 308 & Via Videoconference

In consideration of SENATE BILL 2764, SENATE DRAFT, 2 HOUSE DRAFT 2 RELATING TO SPECIAL MANAGEMENT AREAS

Senate Bill 2764, Senate Draft 2, House Draft 2 proposes to expand exclusions from the definition of "development" as it applies to special management areas to reduce the need for special management area permits for certain activities. The Department of Land and Natural Resources (Department) supports the bill.

Many parts of the State fall both within the Special Management Area and the State Land Use Conservation District, and land uses in these areas might require both Special Management Area permits and Conservation District Use Permits.

The Department appreciates that this measure will exclude from the definition of "development" invasive species control and the installation of fencing for invasive species control or the preservation of native habitats. We believe that this will help facilitate projects that are intended to preserve and protect the State's natural and cultural resources.

Thank you for the opportunity to comment on this measure.



STATE OF HAWAII OFFICE OF PLANNING & SUSTAINABLE DEVELOPMENT

DAVID Y. IGE GOVERNOR

MARY ALICE EVANS DIRECTOR

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813 Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

 Telephone:
 (808) 587-2846

 Fax:
 (808) 587-2824

 Web:
 https://planning.hawaii.gov/

Statement of MARY ALICE EVANS Director, Office of Planning and Sustainable Development before the HOUSE COMMITTEE ON FINANCE Thursday, March 31, 2022 1:30 PM Via Videoconference, State Capitol, Conference Room 308

in consideration of SB 2764 SD2 HD2 RELATING TO SPECIAL MANAGEMENT AREAS.

Chair Luke, Vice Chair Yamashita, and Members of the House Committee on Finance.

The purpose of **SB 2764 SD2 HD2** is to expand exclusions to the definition of "development" under Hawaii Revised Statutes § 205A-22 to streamline the Special Management Area (SMA) permitting procedures for those proposed actions that have no adverse environmental impacts on the SMAs.

As the lead agency of the Hawaii Coastal Zone Management Program, the Office of Planning and Sustainable Development (OPSD) **supports the purpose of SB 2764 SD2 HD2 and provides a recommendation** specific to the proposed size change that would trigger a SMA permit requirement for a single-family residence that is not situated on a shoreline.

The OPSD respectfully recommends keeping the current floor area threshold of 7,500 square feet without amendments to read as follows on Page 3, Lines 15-21:

"(2) Does not include the following:

(A) Construction or reconstruction of a single-family residence that is less than seven thousand five hundred square feet of floor area; is not situated on a shoreline parcel or a parcel that is impacted by waves, storm surges, high tide, or shoreline"

The OPSD recommends retaining the existing floor area threshold for the following reasons:

• Applying or reducing the SMA floor area threshold for the purposes of restricting or preventing undesirable development of single-family residences is misdirected. It is the County's zoning ordinances, such as floor area ratio, height limits, building setbacks, and

use of a single-family residence that determine the allowable land uses of a parcel. Denying the development of a single-family residence that are allowed by county land use policies, even one that may be considered a "monster" house, can rarely be justified based on the SMA guidelines.

• The resulting outcome to lowering the floor area threshold from 7,500 to 5,000 square feet would result in an increase in cost, regulatory procedures and requirements, and additional time for the development of single-family residences that are not situated on shoreline parcels. Since the passage Act 16, SLH 2020 the City and County of Honolulu in particular, has experienced in increase in SMA use permit volume by approximately 65%.

The limited staff resources would be more appropriately suited towards focusing SMA assessments for those developments that may have more significant environmental impacts and/or those that are impacted by coastal hazards, including waves, storm surges, shoreline erosion, and sea level rise.

• Prior testimony requested this proposed threshold amendment for purposes of allowing the county planning authority to review more residential development in the SMA in anticipation of changes to sea levels and coastal erosion. Act 16, SLH 2020 has addressed this concern by requiring that the construction or reconstruction of any single-family residence on a shoreline parcel or a parcel experiencing impacts from coastal hazards must require a SMA permit, regardless of the floor area threshold.

Thank you for the opportunity to testify on this measure.

LATE *Testimony submitted late may not be considered by the Committee for decision making purposes.

DAVID Y. IGE GOVERNOR



TESTIMONY BY:

JADE T. BUTAY DIRECTOR

Deputy Directors ROSS M. HIGASHI EDUARDO P. MANGLALLAN PATRICK H. MCCAIN EDWIN H. SNIFFEN

STATE OF HAWAII DEPARTMENT OF TRANSPORTATION 869 PUNCHBOWL STREET HONOLULU, HAWAII 96813-5097

March 31, 2022 1:30 P.M. State Capitol, Conference Room 308/Teleconference

S.B. 2764 S.D. 2, H.D. 2 RELATING TO SPECIAL MANAGEMENT AREAS

House Committee on Finance

The Department of Transportation (DOT) **supports** this measure that seeks to expand exclusions from the definition of "development" as it applies to special management areas to reduce the need for special management area permits for certain activities.

The DOT appreciates that this bill will streamline the development of projects that include controlling the spread of invasive species and protecting the native seabird population.

Thank you for the opportunity to provide testimony.

DEPARTMENT OF PLANNING AND PERMITTING CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813 PHONE: (808) 768-8000 • FAX: (808) 768-6041 DEPT. WEB SITE: <u>www.honoluludpp.org</u> • CITY WEB SITE: <u>www.honolulu.gov</u>

RICK BLANGIARDI MAYOR



March 31, 2022

DEAN UCHIDA DIRECTOR

DAWN TAKEUCHI APUNA DEPUTY DIRECTOR

EUGENE H. TAKAHASHI DEPUTY DIRECTOR

The Honorable Sylvia Luke, Chair and Members of the Committee on Finance Hawaii House of Representatives Hawaii State Capitol 415 South Beretania Street Honolulu, Hawaii 96813

Dear Chair Luke and Committee Members:

Subject: Senate Bill No. 2764, SD 2, HD 2 Relating to Special Management Areas

The Department of Planning and Permitting (DPP) **supports** Senate Bill No. 2764, SD 2, HD 2, which would exempt certain types of activities from the definition of "development" that are subject to Special Management Area (SMA) review and permitting.

Currently, work on existing government facilities located in the SMA is not excluded as "development." Based on the current law, the City and County of Honolulu, Board of Water Supply (BWS) was required to obtain an SMA permit, which included the preparation of an Environmental Assessment and a public hearing, to construct a security fence around one of its existing pump stations. The security fencing was necessary to prevent ongoing vandalism of the BWS facilities.

The additional time and funds required to secure an SMA permit for these much-needed security measures to an existing facility for public health and safety are excessive and counterproductive to the role of government agencies. We appreciate the current version of this Bill that would exclude from the SMA definition of development the "installation, maintenance, repair, and replacement of security measures, including fencing, to existing public facilities."

For the reasons stated above, we ask that Senate Bill No. 2764, SD 2, HD 2, be passed out of your Committee.

Thank you for this opportunity to testify.

Very truly yours,

Director

Submitted on: 3/30/2022 12:58:28 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Jordan E. Hart	County of Maui, Department of Planning	Support	Remotely Via Zoom

Comments:

Aloha,

Testifying in support. See attached testimony.

Please contact me at 808 268-4118 for any clarification.

Mahalo,

Jordan E. Hart, Deputy Director

County of Maui, Department of Planning

Hawai'i State Association of Counties (HSAC)

Counties of Kaua'i, Maui, Hawai'i, and City & County of Honolulu Website: <u>hawaiicounties.org</u> | Email: <u>hsac@hawaiicounties.org</u>



Hawai'i State Association of Counties

on

S.B. No. 2764, S.D.2, H.D.2 Relating to Special Management Areas.

Committee on Finance Thursday, March 31, 2022, 1:30 p.m.

The Hawai'i State Association of Counties (HSAC) supports S.B. 2764, S.D.2, H.D.2. S.B. 2764, S.D.2, H.D.2, expands the exclusions from what is considered "development" in the special management area to include:

- Public pedestrian and bicycle facilities;
- Trash removal or invasive vegetation removal;
- Installation of fencing;
- Installation, maintenance, repair, and replacement of lighting fixtures and equipment at public recreational facilities;
- Installation, maintenance, repair, and replacement of security measures; and
- Single-family residences less than 5,000 square feet of floor area.

The proposed amendments are meant to "streamline the special management area permitting procedures for …proposed actions that have no adverse environmental impacts on the SMAs."

HSAC supports the exemptions proposed in S.B. 2764, S.D.2, H.D.2, particularly the lowering of the exemption from the definition of "development" single-family residences that are less than 5,000 square feet of floor area that are not:

- Situated on a shoreline parcel;
- A parcel impacted by waves, storm surges, high tide, or shoreline erosion; or
- Part of a larger development.

With the anticipated changes to sea levels and coastal erosion caused by climate change, the proposed change to 5,000 square feet from 7,500 square feet will allow county planning authorities to review more residential development in the special management area for conformance with the development guidelines for the area.

The Hawai'i State Association of Counties strongly supports S.B. 2764, S.D.2, H.D. 2, and requests your favorable consideration of this measure.

Submitted on: 3/30/2022 8:17:37 AM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Trisha Kehaulani Watson	Aina Momona	Support	In Person

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee,

My name is Dr. Trisha Kehaulani Watson, and I am the Vice President of the Board of Directors of Aina Momona. I'd like to testify in support of testimony provided by our Executive Director, Walter Ritte, and add the following testimony.

I support SB2764 **WITH AMENDMENTS**. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

We believe it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

This law has been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

This overreaching use of this law threatens those important efforts.

We urge the finance committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

We also urge the committee to allow for the closure of cess pools. We believe this is an important activity in Hawaii, and we find it shocking that the Maui County Planning Department is requiring an SMA application for the closure of a cess pool. We want to be clear, we are just closing the cess pool, not converting it to septic. We installed incinerator toilets on our property, which required no ground disturbance, but we are being stalled by Maui County's use of the SMA regulations in closing the cess pool.

We are good stewards of this land, and we are gravely disappointed that the state is once again not only failing to protect our constitutionally protected rights, but even more so actively oppressing our ability to restore native habitats, good traditional foods, and care for important fishpond resources. We urge the finance committee to remedy this issue by amending SB2746 accordingly.

Mahalo nui, and I will be available in person to answer questions. Our recommended amendments are attached.



House Committee on Finance

Thursday, March 31st, 2022 1:30 p.m., Conference Room 308

HAPA Supports with Amendments: SB2764 SD2 HD2

Aloha Chair Luke, Vice Chair Yamashita and Members of the Committee,

On behalf of the Hawai'i Alliance for Progressive Action (HAPA) I am submitting testimony in <u>support with amendments for SB2764 SD2 HD2</u>.

SB2764 SD2 HD2 expands exclusions from the definition of "development" as it applies to special management areas to reduce the need for special management area (SMA) permits for certain activities.

The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

HAPA agrees it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

SMA laws have been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

The overreaching use of SMA law threatens these important cultural and environmental efforts and restoration projects.

We urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

Mahalo for your consideration,

Anne Frederick Executive Director

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

Submitted on: 3/29/2022 3:12:23 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Walter Ritte	Individual	Support	In Person

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee,

I support SB2764 **WITH AMENDMENTS**. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

We believe it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

This law has been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

This overreaching use of this law threatens those important efforts.

We urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

We also urge the committee to allow for the closure of cess pools. We believe this is an important activity in Hawaii, and we find it shocking that the Maui County Planning Department

is requiring an SMA application for the closure of a cess pool. We want to be clear, we are just closing the cess pool, not converting it to septic. We installed incinerator toilets on our property, which required no ground disturbance, but we are being stalled by Maui County's requiring a SMA regulations in closing the cess pool.

Submitted on: 3/29/2022 4:27:22 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Luciano	Individual	Support	Written Testimony Only

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee, I support SB2764 WITH AMENDMENTS. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution. Cultural practitioners should be afforded the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors of the coastal zone and have Hawaiians customary rights. I too urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities including fishponds. Thank you very much. Luciano Minerbi COMMITTEE ON FINANCE Thursday, March 31, 2022 1:30 p.m. Conference Room 308

Amendment offered for SB 2764, SD2, HD2, (HSCR1346-22)

Aloha Chair Sylvia Luke, Vice Chair Rep. Kyle T. Yamashita, and Committee Members,

Please support clarifying the following proposed amendment to ensure that Public Access to and along the shoreline is not blocked by fencing :

In Hā'ena, many of our most spectacular beaches including the Hā'ena Community Based Subsistence Fishing area are in the State Conservation District . All the beaches in the state are Conservation Land . Imagine landowners along the State's beaches fencing off the beach "in preservation of native habitat" preventing public use and enjoyment. Please amend to:

(S) Installation of fencing, including associated improvements and incidental structures, for invasive species control or preservation of native habitats on conservation land provided that any fencing must be outside of the shoreline setback area and must not have an adverse impact on public access to and along the shoreline.

Thank you for your consideration of this amendment that will protect continued public use and enjoyment of our public beaches consistent with HRS 205A.

Caren Diamond Kaimanacd22@yahoo.com

Caren Manne

<u>SB-2764-HD-2</u> Submitted on: 3/29/2022 7:02:42 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Zane Kekoa Schweitzer	Individual	Support	Written Testimony Only

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee,

I support SB2764 WITH AMENDMENTS. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

We believe it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

This law has been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

This overreaching use of this law threatens those important efforts.

We urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

Submitted on: 3/29/2022 10:33:31 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Todd Yamashita	Individual	Support	Written Testimony Only

Comments:

Public access to beaches and Native Hawaiian gathering rights were set forth by Aloha \bar{A} 'ina advocates from Molokai in the 1970s. My two Hawaiian sons Kauluwai and Keolinohokai 10 and 8 years old have been able to live their culture here on Molokai because of the grassroots support for their culture insisted and fought for by their kupuna. Their kupuna are calling on us again now to please allow for Native Hawaiians and Native Hawaiian organizations to continue their right to restore shorelina Management designated areas. We need this here on Molokai to continue to build towards self-sufficiency. Mahalo, Todd Yamashita

Submitted on: 3/30/2022 10:50:19 AM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Jane Au	Individual	Support	Written Testimony Only

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee,

I support SB2764 WITH AMENDMENTS. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

We believe it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

This law has been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

This overreaching use of this law threatens those important efforts.

We urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

<u>SB-2764-HD-2</u> Submitted on: 3/30/2022 12:37:32 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Shannon Rudolph	Individual	Support	Written Testimony Only

Comments:

Support WITH AMENDMENTS

Submitted on: 3/30/2022 1:38:04 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Mahina Poepoe	Individual	Oppose	Written Testimony Only

Comments:

Aloha Committee Chair and Members,

Please accept this testimony in OPPOSITION to SB2764.

The SMA process is intended to provide a higher level of scrutiny for projects that occur within the SMA boundaries. This proposed bill undermines the intent of the SMA. I find the proposed legislation to be counterproductive to planning and preparing for coastal retreat, and impacts of sea-level rise and climate change. All activity in the SMA, even conservation activity, if not planned and scrutinized properly, can have unintended and negative consequences.

Several years ago, a property owner on Molokai cleared by bulldozer invasive kiawe trees at the edge of cliffside area and within a sand dune. The impacts of this clearing were hugely negative. The ground was destabilized and eroded into the ocean and onto a traditional fishing trail that was subsequently rendered unusable. The endagered native sea birds that nested beneath the Kiawe trees and in the grassy dunes were displaced and their nesting habitat destroyed. The dunes, which are located within an area with known burials were significantly altered and a mass of sand sand was removed and unrecoverable. It is still unknown whether or not burials were disturbed during the sand excavation.

This is not a unique example, and I am very concerned that expanding the definitions will lead to an increase in a variety of unintended outcomes.

Mahalo, Mahina Poepoe

Molokai Resident

<u>SB-2764-HD-2</u>

Submitted on: 3/30/2022 4:38:56 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Regina Gregory	Individual	Support	Written Testimony Only

Comments:

Please add exemptions for Hawaiian traditional practices.

Submitted on: 3/30/2022 7:08:19 PM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Michelei Tancayo	Individual	Support	Written Testimony Only

Comments:

I agree and support SB2764 which will allow cultural practitioners to Malama 'Aina and resources without time consuming and costly permit applications. We need to ensure that SMA laws allow for Native Hawaiians led conservation and restoration. We cannot afford to spend our time and limited resources conduting permits when our goal is to conserve, enhance and protect our aina.

Submitted on: 3/31/2022 6:31:27 AM Testimony for FIN on 3/31/2022 1:30:00 PM

Submitted By	Organization	Testifier Position	Testify
Nanea Lo	Individual	Support	Written Testimony Only

Comments:

Dear Representative Sylvia Luke and Members of the Finance Committee,

I support SB2764 WITH AMENDMENTS. The SMA laws were intended to protect shoreline areas, but instead, they are keeping cultural practitioners from conducting their traditional and customary practices, which are protected Hawaiian rights under the State Constitution.

We believe it is remiss of the state to pass this measure without affording cultural practitioners the same exemptions that are being offered to private homeowners and conservation projects. Practitioners are the land's first stewards and protectors, but as usual, we are excluded by environmentalists who have no consideration for our traditional practices or rights.

This law has been used to target traditional agricultural practices, traditional aquaculture practices, education programs, and research activities. In 2012, fishpond practitioners mobilized to streamline permitting for fishponds to stop the overregulation of traditional and customary practices. This program has allowed for the substantial growth in fishpond activities, stewardship, and associated traditional practices.

This overreaching use of this law threatens those important efforts.

We urge the financial committee to add the requested exclusions for traditional and customary practices, traditional agricultural practices, associated education and research activities.

me ke aloha 'āina,

Nanea Lo