

DRAFT — FOR EMC REVIEW AND DISCUSSION

**County of Hawai‘i
Environmental Management Commission**

June 15, 2026

Daniel Girvan, P.E., Director
Department of Environmental Management
345 Kekūanāo‘a St.
Hilo, HI 96720

RE: Recommendation to Develop an Island-Wide Comprehensive Composting Plan

Dear Director Girvan,

The Environmental Management Commission (“EMC”) respectfully submits the following recommendations regarding the management of organic waste on Hawai‘i Island. These recommendations are informed by the Department’s recent waste characterization study, which identified organic materials as the single largest component of waste currently being sent to our landfills. Given the environmental, fiscal, and operational implications of this finding – including reduced landfill capacity, increased greenhouse gas emissions from decomposing organics, and lost opportunities for soil health and local agriculture – the Commission believes this issue warrants priority attention.

Accordingly, the EMC recommends that the Department of Environmental Management (“DEM”) take the following actions:

1. Develop a comprehensive, island-wide composting plan that prioritizes decentralized, community-based composting systems.

Rather than relying solely on a single centralized facility, DEM should develop a plan that supports a network of smaller-scale composting hubs distributed across communities island-wide. Decentralized systems reduce transportation costs and emissions associated with hauling organic material long distances, build community resilience and engagement, and can be scaled and implemented more quickly than large, centralized infrastructure. This plan should identify potential community sites, partnership opportunities with nonprofits, farms, schools, and neighborhood associations, and a phased implementation timeline.

2. Engage the State Department of Health (“DOH”) to advocate for greater regulatory flexibility for commercial composting operations.

Current state regulations pose barriers to the permitting and operation of small- and medium-scale commercial composting facilities. The Commission recommends that DEM initiate dialogue with DOH to identify specific regulatory provisions that could be revised

or clarified to better accommodate decentralized and community-scale composting operations, while still maintaining appropriate public health and environmental safeguards. DEM's perspective as the County's solid waste management authority would add valuable weight to this advocacy effort.

Additionally, the Commission recommends that DEM reach out to its counterpart departments in the City and County of Honolulu, Maui County, and Kauai County to explore a coordinated, multi-county approach to this advocacy effort. Each county faces similar regulatory barriers to expanding commercial and community-scale composting infrastructure, and a unified request from all four counties is likely to carry significantly more weight with DOH than a single-county effort.

3. Evaluate and incorporate emerging composting technologies, including in-vessel composting systems.

The Department should explore the role that newer technologies – particularly in-vessel composting units – could play within an island-wide composting strategy. In-vessel systems offer faster processing times, better odor and pest control, and greater siting flexibility than traditional open-air windrow composting, making them well-suited for community-scale locations island-wide. The Commission recommends that any island-wide composting plan include an assessment of these technologies.

The Commission believes that diverting organic materials from the landfill through a coordinated, community-centered approach represents a significant opportunity to extend the lifespan of County landfill capacity, reduce greenhouse gas emissions, and strengthen local food and soil systems.

We would welcome the opportunity to discuss these recommendations further with Department staff and respectfully request a response outlining the Department's perspective on these recommendations and any planned next steps. The Commission is happy to assist in any way that would be useful, including providing a forum for community input as planning develops.

Thank you for your continued partnership and for your attention to this important matter.

Respectfully submitted,

Justin Canelas
Vice Chair, District 6
Environmental Management Commission

[Upon EMC approval: signature block for EMC Chair, on behalf of the full Commission]

Note to Commission: This draft is intended as a starting point for discussion at the June 24th, 2026 EMC meeting. Sections may be revised, expanded with specific data from the waste characterization study (e.g., percentage of organics in the waste stream), or amended based on Commission input before a vote on formal submission.