

Comments on Policies and Procedures for Environmental Advisory Council (EAC)

Roy Abe, 7/24/2022

General

1. Each committee should have their objectives/goals and scope stated up front along with any key guiding principles.
2. Where applicable, the goal of the committees should support HRS Chapter 341 (Par. 341-6) requirements, which states “The Council shall monitor the progress of state, county, and federal agencies in achieving the State’s environmental goals and policies and ...”. It would be helpful to have the “State’s environmental goals and policies” be clearly understood and defined somewhere so everyone understands what they are.
3. Council members have limited available time so their attention and time should ideally be focused on tasks that result in actions that are reasonably implementable and truly beneficial to the environment. The council does a very good job on “administrative” functions, but more effort should be devoted to “visionary” long-term and impactful pursuits. A key goal for environmental protection should be to devote resources and funding where it does the most good.
4. As a statewide organization with representatives and experts in various fields, the council is in a unique position to help prioritize and recommend/promote needed environmental actions. This previously was effectively done in the past by DOH’s Environmental Planning Office (see <https://health.hawaii.gov/epo/>) and UH’s Environmental Center (<https://scholarspace.manoa.hawaii.edu/communities/8ec86a53-fa08-43a3-bb93-32c18a92f0b6>). Both are now essentially defunct due to funding cuts. State planning agencies and DLNR do environmental planning work, but certain areas such as water pollution control, do not receive the same science-based support and decision making attention as in the 1970s and 1980s. With projected funding requirements potentially in the \$5 to \$10 billion range for future wastewater treatment, cesspool, and injection well work, more attention should be given to prioritizing actions on a broader holistic basis. From a science-based viewpoint, one would find that the cost-effectiveness and true environmental benefits are much higher for watershed protection and enhancement projects, which struggle to secure funding. Decisions should not be based just on “emotions” and opinions of those who are the most vocal and effective in getting heard. Input from scientists and engineers should be considered and opinions from a wide range of experts and stakeholders should be considered.

Annual Report (AR) Committee

1. The objectives/goals should include what is dictated by the regulatory requirements (Par. 343-6) as a minimum, which is “making recommendations for improvement to the governor, the legislature, and the public ...”.
2. The goal should be to have the recommendations result in actual actions that have beneficial environmental impacts. The recommendations should be meaningful and target the most important issues and the right audience. Since the AR is not read by many, there should be follow up action by the legislative, I&O (information and outreach), and other EAC committees, as well as by council members in general.

3. A general AR report preparation timeline for the calendar year should be developed and updated as needed. It could simply consist of a list of tasks and target start/completion dates. Distributing the workload over the full year will reduce stress and should result in a better end product.
4. In earlier years, OEQC staff provided significant support for the AR. Support from agencies and staff from outside the council should be solicited to the extent possible. Paragraph 346-6 states “with the assistance of the director shall make an annual report ...”.

Information and Outreach Committee

1. Topics and issues covered should focus on those that significantly benefit the environment and have a good probability of actually being implemented. Issues covered should be coordinated with the overall goals, objectives, and priorities of the EAC and other key stakeholders.
2. Informational events should be recorded and distributed to key stakeholders to educate a wider audience and help promote subsequent action. The Council and committees should take follow-up action to influence others so there is actual action that results in real environmental benefits.

Comments on Rules

1. An enormous amount of time and funding is spent on preparing massive EA and EIS documents. In many cases, some of the key issues are either not covered or buried deep in the document. The general public may often find these documents difficult to read and be “snowed over” or discouraged by the massive amount of text and information. Conciseness and the need to cover key relevant issues should be emphasized more. In the past (1980s), the UH Environmental Center and some of the OEQC staff provided “quality” in-depth thoughtful comments. These comments were highly relevant and project-specific, rather than just typical “boilerplate” comments. Due staff and funding limitations, many agencies currently often do not provide substantive project-specific comments.
2. It would be helpful to revisit the “triggers” for EAs and EISs. Many very large privately funded projects do not go through the EA/EIS process. Many smaller government funded projects that have minimal impacts have fairly massive EAs prepared for them. The need and level of detail for the environmental review process should be commensurate with the potential impacts. Savings in time and funds for everyone could be realized. In the end, costs for the environmental review process are passed on to the public. The public and the environment are adversely affected by impacts that are not identified and/or glossed over.