



# SIERRA CLUB

## HAWAI'I ISLAND GROUP

October 24, 2023

Hawai'i County Building  
25 Aupuni Street  
Hilo HI 96720

Re: Testimony on Agenda Item V.2.

Aloha Madame Chair and members of the Environmental Management Committee,

The Sierra Club of Hawai'i, Hawai'i Island Group (HIG) is respectfully requesting the EMC to defer any final recommendations related to agenda item V.2. to allow the EMC to receive input from an informed public, debate the merits and weaknesses of General Plan 2045 (GP2045), and amend the GP2045 to address any uncovered weaknesses.

The General Plan comprehensive review process was initiated by the Planning Department in 2015. The recommended draft, General Plan 2040, was released in 2019. After a couple of public meetings, nothing more was heard about the comprehensive review process.

Then, on September 18<sup>th</sup>, the Planning Department released to the public the current completely re-written recommended draft, GP2045, via a website owned and operated by a contractor, Konveio. In order to comment on GP2045 and the General Plan Land Use (GPLU) maps, members of the public must first learn how to operate and navigate Konveio's artificial-intelligence-enhanced software in order to submit comments on GP2045.

Needless to say, this has been a challenge for a majority of the members of the public and so the Planning Department has agreed to extend the time to comment from November 20, 2023 to March 1, 2024.

Since the General Plan supercedes all county law, rules, and regulations, with the exception of the county Charter, HIG appreciates the Planning Department giving the public, county agencies, commission, committees, boards, etc. more time to evaluate and comment on GP2045.

HIG does not know when the EMC was first given access to the GP2045, but has the EMC had an adequate amount of time to:

1. compare the existing 2005 General Plan with the GP2045 to determine if language, goals, policies, and/or courses of action have or have not been adequately addressed in the GP2045,

2. evaluate the degree to which the GP2045 addresses past, current, and future environmental issues,
3. determine the extent that the GP2045 implements solutions to these issues under “GENERAL PLAN IMPLEMENTATION”, and
4. determine which sections of GP2045 fall within its purview and the extent to which they do?

For instance, in the GP2045 there are six themed “chapters”. Chapter 3 is “SUSTAINABLE DEVELOPMENT AND RESILIENT COMMUNITIES”. Section 3 of Chapter 3 is “Public Utilities”. Section 3.4 is “Drinking Water Conservation”, 3.5 is “Wastewater Treatment and Reuse”, and Sec. 3.6 is “Stormwater Infiltration and Green Infrastructure”. Section 4 is “Public Facilities and Services” with Section 4.3 being “Solid Waste Management”. All of these are inter-related with regard to environmental management.

In addition, Chapter 5 is “COLLABORTIVE BIOCULTURAL STEWARDSHIP” under which is listed “Environmental Goal”. Our understanding of the term “biocultural” is to acknowledge that it is impossible to draw a line between culture and environment for kanaka maoli. To what extent will the EMC be involved in the environmental goal of biocultural stewardship?

Members of the HIG have not had time to properly evaluate the currently recommended GP2045, so is unable to provide additional testimony at this time on agenda item V.2. other than to ask:

1. Has the Planning Department explained to the EMC how the current language contained within GP2045 will impact current laws, rules, and regulations associated with the operation and responsibilities of the EMC and the Department of Environmental Management (DEM),
2. Will the GP2045 empower or impede the EMC and DEM with regard to current operations and responsibilities, and
3. Does the language in the GP2045 adequately address violations of existing environmental laws, rules, and regulations, such as the Clean Water Act, and non-compliance with two existing federal consent decrees in a timely, well-funded manner?
4. Does the GP2045 adequately consider the lack of sustainable funding that has led to existing wastewater infrastructure deterioration?
5. Does the GP2045 adequately consider the facilities and funding needed to construct additional infrastructure to keep up with growth?

Mahalo for the opportunity to testify,

Chuck Flaherty, Chair