

PART VI

SUMMARY AND CONCLUSIONS

THE STUDY AND REPORT

Purposes

The report of which this is a summary relates to the Environmental Impact Statement (EIS) system that was established in Hawaii in accordance with the provisions of Act 246 of the 1974 Legislature (Hawaii Revised Statutes Chapter 343) and the Regulations of the Environmental Quality Commission (EQC) that was established under the Act. The study on which the report was based was commissioned by the Office of Environmental Quality Control (OEQC) in June 1977. The purposes were to investigate the development and characteristics of the EIS system and means by which it might be improved.

The summary and conclusions here presented have been prepared in a form intended to serve as both the final part of the complete report and as a summary report. Although the summary report may have wider distribution, reference must be made to the complete report for substantiation of the conclusions presented.

Accomplishments and Limitations

As indicated in the introduction to the full report, the Environmental Center had considerable background experience that might well be considered to represent a preliminary phase of this study commissioned by the Office of Environmental Quality Control (OEQC). Two general approaches may be recognized as constituting essentially sequential phases in the study itself: 1) a first-phase in-house approach involving use of the information already available to us, or cited in what was already available, to develop our preliminary report; and 2) a second-phase approach involving use of the preliminary report as a device to stimulate discussion with us by as large a segment of the external public as was feasible.

As in the case of projects, alternatives and their environmental effects, there is a wide range of possible alternative systems to provide decision makers with environmental information and each alternative system would have an infinitely ramifying set of effects. No finite study could ever explore all of the alternatives and ramifications. We believe that our study will be considered at least reasonably thorough.

The most immediate test of the acceptance of the conclusions we have drawn in our study will be the extent to which our recommendations as to improvement of the EIS system are adopted in the near future. A further test will be the extent to which the results of our study will stimulate further study of the EIS system and extent to which the analytic approach we have used will be found useful in such further study.

In addition to general conclusions as to the effectiveness, efficiency, and limitations of the State EIS system we have developed four kinds of recommendations or suggestions on the basis of our study. These pertain to:

- i) improvements that do not require amendment of the EIS Act or EQC Regulations;

- ii) amendments of the Act and Regulations that would result in improvements in the system;
- iii) suggestions as to additional changes that might result in improvement;
and
- iv) further studies of the EIS system and other systems that would supplement its role in environmental management.

GENERAL CONCLUSIONS

Purposes and Clients of EIS systems

The principal purpose of an EIS system is to provide decision makers with information as to the environmental effects of proposed actions, to be taken into account in the decisions whether the actions should be undertaken or approved. Collateral purposes include the promotion of general environmental understanding. The needs implied by these purposes are important ones, and all EIS systems serve to meet them to some extent. Recognition of the purposes is essential to determine the context in which the significance of environmental impacts and the adequacy of EIS's are to be judged.

The clientele of EIS systems include, not merely the decision makers with final approval power, but the proposers of actions, others particularly concerned with the environmental effects of the actions, and the environmentally-concerned public.

All of these types of clients are served by the Hawaii State EIS System.

Other EIS Systems in Hawaii

Formal EIS systems in operation in Hawaii include, not only the State system established under the Environmental Impact Statement Act of 1974, but a federal system established under the National Environmental Policy Act of 1970, a system established in the City and County of Honolulu to assist in serving the purposes of the Shoreline Protection Act of 1975, and a system established in the County of Hawaii pertaining to planned developments. Of these systems, that covering the largest number of actions in Hawaii is the State system.

Characteristics of State EIS System

Coverage

The principal concern of the EIS system is with actions that will have significant impacts on the natural, outdoor, physical environment, but the concern extends appropriately to certain artificial and indoor aspects. Concerns with the secondary social impacts are essential in the system, because the significance of the physical impacts must be judged in human terms.

The State EIS System covers actions that propose the use of State or County lands or funds and certain categories of private actions that require the approval of State or County agencies. Limitation of the coverage of private actions was wise until the System could be tested in use. The appropriate criterion for determining the extent of coverage is statewide concern with the environmental impacts of the actions.

Procedure

The State EIS system employs a multiple screening procedure for determining what actions will have significant environmental impacts and will, therefore, require EIS's. Most of the actions that are covered by the system fall within

classes and types that are exempt from individual assessment on the grounds that they will not have any significant environmental impacts. Non-exempt actions are subject to individual environmental assessment. If it is determined that an action will not have a significant environmental impact, a Negative Declaration is issued; if not, an EIS Preparation Notice is issued. Any interested party may, on request, become involved in the preparation of an EIS.

Public review, response to review comments, and formal acceptance of the EIS must precede the approval or undertaking of any action for which an EIS Preparation Notice has been issued.

Placements of responsibility

As in most other EIS systems, the responsibilities are decentralized in the Hawaii State EIS system. Unlike most systems, however, the State system places the responsibility for EIS preparation on the proposer of a project, even if the proposer is a private party, rather than on the agency that has the power of approval of the project. With this placement of preparation responsibility, the closest coupling of environmental impact consideration and project planning is achieved. However, a project proposer has a natural bias, which is often clear in the EIS and can only be offset by review. Broad opportunities for public review of EIS's are provided in the State system.

The final judgements as to the acceptability of EIS's are made by the Governor in case of EIS's on state-agency EIS's, by the mayors in the case of EIS's on county-agency actions, and by the approving agencies in the case of actions proposed by private applicants.

Performance of the State EIS System

As the following statistics indicate, the State EIS system has provided for the explicit consideration of the environmental impacts of a large number of projects:

Projects subject to environmental assessments	1011
Projects subject to "EIS Preparation Notices"	137
EIS's filed	74
EIS's accepted	45

However, the effectiveness of the system has been limited through:

- Inappropriate exemption of some types of action;
- Inappropriate Negative Declarations on some actions; and
- Inadequate identifications and appraisals of environmental impacts in EIS's.

The adequacy of some EIS's, particularly EIS's on applicant actions, has been limited by the limitations placed on the periods available for review and response to review comments.

The costs of implementing the EIS system include both direct costs and the indirect costs attributable to delays in project undertakings. Except in a few cases, the direct costs have represented only very small fractions of total project costs. The delays may be more significant. If the costs could not be reduced, they would be warranted by the benefits of the system, but we believe improvements can be made that will both increase the benefits and decrease the costs.

Inherent limitations of the EIS System

As all EIS systems, the State EIS System is simply a means to provide decision makers with information on the environmental impacts of proposed actions. The Act establishing the system does not alter any placements of authority over the action themselves, and it cannot assure that those with such authority will make wise and effective use of the information provided.

The EIS system is not, at least as yet, an effective tool in decision making at the level of comprehensive planning. At this level, documents of broader content than EIS's are needed.

Potentials for Improvement

Major improvements in the effectiveness of the exemption and assessment processes of the EIS system and the processes of EIS preparation, review, and acceptance, could be made without amending the EIS Act or the EQC Regulations. Significant reduction in the cost of the EIS system could also be made without amendments of the formal provisions governing it. However, a number of improvements in effectiveness and some of the reduction in costs will require, or at least be promoted by, modifications of the system that will require amendments of the Act, the Regulations, or both.

Further increases in the effectiveness and reductions in the costs of the use of the EIS system depend, not on modifications of the EIS system, but on improvements in the use of the EIS system in the broader environmental decision-making process, and in particular the permit processes.

It is possible that the principles of environmental analysis can effectively be applied to comprehensive planning, as well as to the consideration of individual projects. This broader application will require something in addition to the present EIS system.

IMPROVEMENTS OF THE EIS SYSTEM NOT REQUIRING AMENDMENT OF ACT OR REGULATIONS

The principal failures of the EIS system that we have identified cannot be remedied by amendment of the EIS Act or EQC Regulations, although certain amendments will help reduce the failures in some cases.

The improvements in effectiveness, and in some cases significant reduction in costs, depend upon better coordination of agency activities, the provision of more staff competence to agencies, and most importantly the increase of agency concerns with the success of the EIS system and environmental management in general.

We suggest that the Office of Environmental Quality Control be provided with means to increase its assistance to other state agencies, and to provide more extensive inter-agency coordination in the preparation of environmental assessments and the preparation and review of EIS's. We also suggest that OEQC advise on expansion of environmental staffs in other agencies.

Improvements in Exemption Process

Some of the classes of actions that have been exempt by the EQC from individual assessment, and some of the types of action listed by agencies for exemption have been defined so broadly that they include actions that will have significant impacts. Since the impacts of actions exempted will not be subjected to further environmental assessment, the failure to define exempt classes and types carefully is a serious one.

Redefinition of the classes exempt by EQC may be accomplished by amendment of the EQC Regulations, as we have recommended. Redefinition of the types exempt by agencies will be promoted by recommended amendments of the provisions of the Act regarding exemption, but the actual redefinition will require review of all of the originally-proposed agency lists of exempt types. Such review is necessitated by a ruling that the process by which they were approved by EQC was improper, as we have earlier noted. We have recommended amendment of the Act to provide for an appropriate procedure. The adoption of a more critical attitude by the EQC regarding exemptions would also be a help.

Improvements in Assessment Process

It would be impossible to develop definitions of general classes and types of actions to be exempt from EIS preparation in such a way as to include all that will have no significant environmental impacts. Yet, it would be pointless to require the preparation of EIS's for actions whose impacts will not be significant. Hence, the EIS system appropriately provides for environmental assessment of individual non-exempt actions and for determination, in the case of each action, whether or not an EIS should be prepared. However, as indicated in the discussion of the use of the assessment screen, Negative Declarations have been issued on some actions that will clearly have significant environmental impacts, thus defeating the purpose of the EIS Act. The extent of the misuse of the assessment screen is arguable but, in the judgment of the Environmental Center, considerable.

We have recommended amendment of the EIS Act to clarify that the appropriate criterion for issuance of a Negative Declaration is that the action cannot reasonably be expected to have a significant impact. We have also recommended amendment to allow for appeal to the EQC in the case of an improper Negative Declaration.

Like the processes of EIS preparation and review discussed below, the environmental assessments of agencies could be improved with increases in staff with environmental competence and by increased interagency coordination.

Fundamentally, however, the appropriate use of the assessment screen depends upon the adoption by agencies of a policy involving critical analysis and unbiased judgment, and we have no suggestions as to how this may be achieved save by the increasing agency-staff awareness of the importance of the environmental impacts of the actions with whose undertaking or approval they are concerned.

The overall costs of environmental assessment could be significantly reduced if the assessments were applied more often to programs within which similar projects were to be undertaken in areas in which similar effects were anticipated. The number and scope of individual assessments required on the projects to be undertaken in these programs could then be considerably reduced.

Improvements in EIS preparation, review, and acceptance

In the case of an action for which an EIS has been required, the success of the EIS system depends upon the development of a statement that adequately discloses the environmental impacts and their human implications. To promote the closest coupling between the planning for an action and the analysis of its environmental impacts, we consider it wise that the responsibility for EIS preparation has been placed on the proposer of the action. We consider that the broad public review called for the state EIS system is the best offset to the pro-action bias of its proposer. However, the adequacy of the final EIS depends critically on the response of the proposing preparing party to review comments and on the judgment of the party accepting the EIS.

Many EIS's would be considerably improved if those who prepared them did not follow the content requirements slavishly as outlines but used outlines for the EIS's appropriate to the respective actions and their impacts. Many would be considerably improved if they were briefer, and if non-pertinent material (however easy to collate) were deleted, and if supporting details were placed in appendices. (Such appendices and other background documents should be cited in the EIS's themselves.)

The preparation and review of EIS's by agencies could be considerably improved if the agencies were provided with more environmental staff competence and there were more interagency cooperation. At least at the state level, the OEQC could assist greatly by providing more coordination. As in the case of environmental assessment, however, nothing can substitute for the adoption by agencies of a policy involving critical analysis and unbiased judgment, and the increased agency-staff awareness of the importance of the environmental impacts of actions.

As indicated in our discussion of the acceptance process, many EIS's have been accepted in which, in the judgment of the Environmental Center, there was inadequate response to review comments that called attention to significant environmental effects which were not identified or whose analysis was invalid or inadequate. We have made some recommendations concerning optional extensions of the time limit for the review and response process that should be helpful in reducing the inadequacies of the final EIS's, as well as some recommendations that should reduce the inadequacies of the EIS's as they are initially submitted for review.

Fundamentally, the responsibilities to assure that EIS's are adequate rest with the chief executives of the state and counties and agency heads who have the power to accept them.

Improvement in the quality of final EIS's will be excessively costly if it can be accomplished only through repeated challenges to EIS acceptances in the courts; the accomplishment of the improvement will also be unduly slow. However, we have no suggestion how EIS acceptance decisions may be improved otherwise, save by increasing the awareness of the accepting authorities that the environmental impacts of actions are important and need careful and comprehensive appraisal.

The costs of EIS preparation and review could be somewhat reduced if EIS's were prepared for programs in which similar projects were to be undertaken in areas in which similar environmental effects were anticipated. Only supplemental EIS's would be needed for individual projects within such programs, and their number and scope would be smaller than the number of EIS's on individual projects not covered in a program EIS.

PROPOSED AMENDMENTS TO EIS ACT AND EQC REGULATIONS

Our recommendations as to amendments of the EIS Act and the EQC Regulations have all been discussed, with their rationale, in previous parts of the report. The nature of the amendments proposed for immediate consideration, and their rationale, are summarized in Table 4, together with citations of pages in earlier parts of the report on which their fuller discussion may be found. In the table, as in the earlier discussion, the term recommendation (R) is used with reference to changes for which there is substantial objective rationale; the term suggestion (S) is used with reference to changes for which the rationale is more subjective.

Table 4. Proposed amendment to EIS Act and EQC Regulations

No.	Recommendation (R) or Suggestion (S)	Pertaining to Act (A) or Regulation (R)	Recommendation or suggestion	Rationale	Page
<u>A. Statement of findings and purpose</u>					
1.	S	A,R	Incorporate statement of purpose of EIS system.	Indicate context in which significance of impact and adequacy of EIS's is to be judged.	28
2.	S	A,R	Incorporate other findings	Reflect collateral purposes of EIS system.	28
<u>B. Approval criterion for coverage of private actions in EIS System</u>					
1.	S	A	Make effective as to coverage and not merely as to mechanism for assessment.	Eliminate present requirement for EIS's on some actions that do not require approvals and for which there is no mechanism for assessment.	34
2.	S	A	Restrict to discretionary approvals.	Recognize that ministerial approvals cannot be denied on environmental grounds.	34
<u>C. Geographic criteria for requiring EIS's on private actions</u>					
1.	R	A,R	Include actions in Shoreline Special Management areas.	Recognize statewide environmental concern.	38
2.	R	A,R	Include actions in prime agricultural lands in Agricultural Districts.	Recognize statewide environmental concern.	38
3.	S	A,R	Include actions in Capitol District.	Recognize statewide environmental concern.	39
4.	S	A,R	Include actions in areas designated by counties.	Recognize county environmental concern.	39
<u>D. Administrative criteria for requiring EIS's on private actions</u>					
1.	S	A,S	Include all actions requiring general plan amendments	Remedy present inconsistency of treatment of general plan amendments between those introduced by County Councils (even at request of applicants) and those required by an applicant action.	40
2.	R	A,R	Include actions requiring change from Conservation Land designation.	Recognize statewide environmental concern.	40
3.	R	A,R	Include actions requiring change from Agricultural Land designation for prime agricultural lands.	Recognize statewide environmental concern.	40
<u>E. Significant effects criterion</u>					
1.	S	A,R	Improve definition of "significant effects" from editorial standpoint.	Make more precise and consistent with usage.	43
2.	R	A	Revise use of criterion to require EIS if action may reasonably have significant effects	Avoid failure to recognize significant impacts that an EIS would disclose	44

No.	Recommendation (R) or Suggestion (S)	Pertaining to Act (A) or Regulation (R)	Recommendation or Suggestion	Rationale	Page
<u>F. Exemption provisions</u>					
1.	R	A	Delete redundant requirement for exemptions of insignificant actions.	Eliminate pointless redundancy.	50
2.	R	A	Authorize emergency exemptions.	Supply authority for EQC provision.	60
3.	R	R	Delete maintenance of topographic features from list of exempt actions.	Require assessment of actions of a type that will generally have significant impacts.	52
4.	S	R	Add structures intended to affect the physical environment to those excluded from exemption.	Require assessment of actions of types that will generally have significant impacts.	52
5.	R	A	Authorize agency listing of types of actions to be exempt from assessment, subject to EQC approval.	Provide legislative authority for present EQC provision.	59
6.	R	A,R	Require public notice and public hearing on agency exemption lists.	Assure that exemption lists do not include actions that will have significant impacts.	59
7.	R	R	Require identification of action types in agency lists with EQC exemption classes and require submission of statement of rationale with proposed agency exemption lists.	Assure that exemption lists do not include actions that will have significant impacts.	59
<u>G. Assessments</u>					
1.	R	A	Provide a definition of an "assessment" as a document.	Require appropriate documentation in conformity with EQC Regulations.	60
2.	R	A	Provide for formalization of assessment process.	Conform with requirements in EQC Regulations.	60
<u>H. EIS terminology</u>					
1.	S	R	Refer to EIS as submitted for review as draft EIS. Refer to EIS as submitted for acceptance as final EIS.	Avoid confusion with federal EIS terminology.	80, 112
<u>I. EIS Content</u>					
1.	R	A,R	Provide that natural hazards must be discussed in EIS's.	Require the discussion of these "inverse" impacts, already generally recognized in EIS preparation.	76
<u>J. Supplemental EIS's</u>					
1.	R	A	Provide that, at the option of the proposer of an action, details as to significant environmental impacts may be addressed in supplemental EIS's pertaining to phases of the action corresponding to phases of approval, so long as the initial EIS addresses the possible range of impacts comprehensively.	Conform with appropriate provision in EQC Regulations.	113

RECOMMENDED STUDIES AND ADDITIONAL SUGGESTIONS

Clearly, further studies of the environmental impacts of projects will be needed. These will be provided so long as EIS's are required for the projects. Clearly also, there is need for further studies of ecological relationships, natural resources, and human needs, to improve the means for appraising the environmental impacts. The investigation of research programs under which these more fundamental studies may be undertaken is beyond the scope of our study. Opinions as to certain kinds of further studies needed are, however, appropriately expressed in this report. These include further general studies of EIS systems, and specifically the Hawaii State System, studies of specific possible improvements of the State system that we have not adequately explored, and studies of means to incorporate environmental concerns better into decision making and comprehensive planning.

The priority given to these studies depends upon the importance assigned to the changes in, or relating to, the use of the EIS system.

We summarize in this chapter not merely the studies themselves but the changes that might result from them, and also a few changes that should be considered on the basis of present information, without further study, but that we have not definitely recommended or suggested because the decisions to adopt them depend too much on subjective judgments.

The page numbers following the headings for each section refer to fuller discussions of the changes and proposed studies in earlier parts of the report.

The EIS system

The operation of the State EIS system and other EIS systems applying in Hawaii will continue to be a concern of the Environmental Center as well as many other institutions. It seems clear, however, that special studies of the sort represented by this report will be appropriate also, but we believe that the appropriate timing of the next special study of general scope depends on the near-future reaction to our recommendations and suggestions.

On the one hand, if our recommendations as to changes in the EIS Act and EQC Regulations are adopted (or if other significant changes are made), it would seem that any further special study of the system as a whole should be deferred until the effects of the changes can be assessed. In spite of our recognition that our analysis of the present system could usefully be extended, the extension would seem of primarily academic interest if significant changes in the system were to be introduced in the near future. We suggest that a period of trial of the modified system in the order of the three-year period since the EIS Act was implemented, would be appropriate before the next special study is undertaken.

On the other hand, if further study seems necessary before the larger part of the changes we have recommended (or others) are made in the State EIS system, we believe that the further study should be undertaken promptly, whether by the Environmental Center or by some other institutions. The appropriate focus of the further study will presumably emerge from discussions of this report and its conclusions.

We recommend the use of a methodology similar to ours in the further special study of the EIS system in either case.

Extension of social impact coverage in EIS system (pp. 30-32)

In our chapter of the coverage of the EIS system and elsewhere, we have discussed the question of the extent to which the purely social impacts of action should be the bases for deciding whether EIS's on the action should be required and should be discussed in those EIS's that are required. We have suggested that if the purely social effects are to receive attention equal to that of the physical impacts with their social implication, the titles of the system and a document produced under it should be changed from environmental impact statement to impact statement.

There is considerable disagreement as to the desirability of the possible changes in system coverage and document content. We do not believe, however, that further study now would be of much assistance in settling the issue.

County general plan amendments (pp. 39-40)

The present inconsistencies in the coverage of general plan amendments (between those required by proposed actions and those initiated by counties, and between those in counties whose Planning Commissions make the amendments and those in counties whose Planning Commissions merely recommend as to amendments) should be removed. We have suggested as one alternative, the Act be amended as proposed in HB 1065, HD 1, to define agency approval in such a way that all County general plan amendments would be covered by the EIS system. We suggest consideration of a second alternative that the requirement of a county general plan amendment be deleted from the criteria for EIS-system coverage of private actions.

The choice between the two alternatives, although important, seems so arbitrary that we do not believe any special study is warranted. However, we have recommended special study of a possible future third alternative, the establishment of a system similar to the EIS system but especially designed to disclose the impacts implied by general plans and their amendments.

Selected-permit criteria for determining system coverage (pp. 40-41)

In our chapter on the coverage of the State EIS system, we discussed the suggestion that, so long as the coverage of private actions by the system needs to be limited, the limitation should be made on the basis of types of permits required rather than on geographic locations. The suggestion should be considered seriously, but should not be adopted until a sensible choice can be made of the permits to be used as coverage criteria, the environmental concerns that may be taken into account by the approving agency in awarding those permits, and the possible desirability of limiting the content of EIS's on actions subject to those permits to those concerns.

We recommend that a special study be made of the advantages, disadvantages, and optimal form of a system for determining EIS system coverage of private actions based on types of permits required.

Placement of costs of assessments (pp. 68-69)

In the State EIS system the costs of preparing EIS's are placed, together with the responsibility for preparation, on the proposers of actions. The costs of environmental assessments of private actions are, however, born by the approving agencies. We have assumed that the approving agencies may require information from the applicants on which to base their assessments. We have suggested in addition, however, that provision be made in the EIS Act for approving agencies to charge fees representing the costs of assessment.

At least two states (California and New York) have provided that applicants may be charged fees by agencies preparing EIS's on the actions they propose. The experience of those states should be studied to indicate the advantages and disadvantages of making such a provision in the case of assessments and possible bases for establishing a fee schedule.

Time limit for EIS acceptance (p. 86)

We have suggested that the EIS Act be amended to allow for the extension of the 60-day period for the review, response, and acceptance of an applicant's EIS, at the request of the applicant, if he is unable to respond adequately to review comments. We have also suggested that, in the case of a major, complex action, the public interests would be served best by such an extension. However, in recognition of the need to protect applicants against dilatory tactics of agencies, we have not suggested amendment of the Act now to provide for extensions at the option of agencies.

If the Legislature considers that under certain circumstances, approving agencies should have the right to call for a longer period of review, response, and acceptance of applicant EIS's a study should be made to define: i) the actions to whose EIS's the extension should be limited, ii) the stage of the EIS system at which an agency might have the right to call for an extended period; and iii) conditions under which an applicant might appeal an agency determination that an extended period should be provided.

Delegation of EIS acceptance power (p. 71)

The EIS Act provides that the Governor and the mayors have the power to accept EIS's on agency actions, but may delegate their power to their representatives. The evidence suggests to us the intent that the Governor may delegate the acceptance power to only one state official and that a mayor may delegate the power to only one county official. We consider that the power to accept the EIS's prepared by agencies should not be delegated to agencies. If necessary, the intent of the Legislature in this respect should be clarified.

Guidelines for EIS acceptability (p. 88)

We have suggested that an EIS should be considered adequate if:

- 1) The description of the project, the environment, and the environmental impacts are valid;
- 2) The identification of the environmental impacts of the project and its reasonable alternatives is comprehensive;

- 3) The appraisal of the environmental impacts represents analysis in sufficient depth to meet the needs for a wise decision whether the action should be undertaken or approved.

We have not suggested formal adoption of these guidelines, but we consider that their use would avoid both major excesses in requirements for environmental analysis in the EIS system and major deficiencies in accepted EIS's.

Meshing EIS and permit procedures (p. 125)

The intensity of interest in coordinating permit processes and meshing EIS requirements with these is so great, that no recommendation is needed from us to promote investigations of improved meshing mechanisms.

However, we wish to call attention to the danger that simplistic solutions to the problems of permits- and EIS-system meshing will overlook the valid purposes of the permit and EIS requirements. To be useful, meshing studies should consider:

- a) The purposes of existing permit and EIS requirements; and
- b) Means for meshing more efficiently but still meeting valid needs, discriminating between means that require:
 - i) only changes in practice,
 - ii) changes in state or county agency regulations,
 - iii) changes in State laws or county ordinances,
 - iv) changes in federal laws or regulations.

Incorporation of environmental concerns in comprehensive planning (pp. 117-121)

We have considered extensively the problem of incorporating environmental concerns in comprehensive planning. We have questioned whether EIS's, as such, are the most appropriate documents to relate to the more general kinds of plans. However, we have suggested that comprehensive rationale statements should be incorporated in or appended to comprehensive planning documents. Such statements would provide bases for the decisions whether the plans should or should not be adopted. As we have indicated, they might also reduce considerably the needs for analysis of impacts of individual projects undertaken in accord with the adopted plans. A statement of the kind needed (which we have suggested might be called a CORS) should address the full range of social and economic implications of a plan, and not merely the environmental implications.

Improvements in comprehensive and general planning along the lines we have suggested have been made in recent years, for example, in the development of the new State General Plan. However, the rationale statements so far provided for comprehensive plans fall far short of what we consider desirable. Extensive research is needed to improve techniques for analyzing the implications of comprehensive plans. We recommend specifically, however, the undertaking of a study of restricted scope--one intended to investigate the possible effectiveness of introducing a CORS system based on present analytic capabilities into comprehensive planning. Such a study should examine:

- 1) Whether CORS's based on present analytic techniques, incorporated in or accompanying comprehensive plans, might materially reduce the number and content of EIS's on projects proposed in conformity with the plans;
- 2) Whether the objective of environmental management would be served better by the combination of whatever CORS system is now feasible with the EIS system than by the EIS system alone; and
- 3) What requirements should be made with respect to the scope, preparation, review, and acceptance of CORS's and what provisions should be made in the EIS system to take advantage of the CORS system.