

HB 2488 doesn't follow the normal structure of the Statewide Planning Goals. It is also repetitive and un-needed. Rather current Goals need to be more fully implemented to solve problems indicated by HB 2488.

Goal 1 concerns Citizen Involvement. This is where representation of under-represented groups should be addressed. Goal 1 states: "The citizen involvement program shall involve a cross-section of affected citizens in all phases of the planning process." By this and other parts of Goal 1, the law already provides for there not to be under-represented groups.

Sponsors of HB 2488 think disadvantaged groups and people of color have been under represented.

I have participated in many processes involving the Statewide Planning Goals from local to state testimony on issues, to development of rules, to appeals of issue and rule decisions. I have observed that there are various under-represented groups besides racial minorities or low-income individuals. Usually the process is dominated by people who are paid to participate by business or government. Citizens are often represented by retirees who don't have to go to work. Working people and mothers of young children are the most under-represented groups I have observed. All people including these people should have their voices heard and their needs addressed.

Since Goal 1 already requires that planning involve a cross-section of affected citizens, it appears that agency application of Goal 1 should be challenged and agencies should work to comply with Goal 1, rather than writing new Statewide Planning Goal language to cover an issue already addressed in current language.

Goal 6 concerns Air, Water, and Land Resources Quality. Goal 6 states as its purpose: "To maintain and improve the quality of the air.. resources of the state." Furthermore, Goal 1 states:

"With respect to the air... resources of the applicable air sheds ...described or included in state environmental quality statutes, rules, standards and implementation plans, such discharges shall not (1) exceed the carrying capacity of such resources, considering long range needs; (2) degrade such resources; or (3) threaten the availability of such resources.

Goal 6 in protecting the air resource inherently includes protecting the climate. In fact, Merriam Webster gives climate and atmosphere as synonyms for air.

Since Goal 6 already requires that the air resource which includes climate be maintained and improved and discharges which includes carbon dioxide and other greenhouse gases not degrade the resource, it appears that agency application of Goal 6 should be challenged and agencies should work to comply with Goal 6, rather than writing new Statewide Planning Goal language to cover an issue already addressed in current language.

Rulemaking is a time-consuming and staff-consuming process and represents too much of an untimely delay to benefit either the climate, that needs immediate action, or justice that should be immediate too. The time frame for HB 2488 is several or more years out (such as 2023 or 2026). The Intergovernmental Panel on Climate Change indicated in 2018 that there were about 10 years to get climate solutions implemented. The staff that would develop new "climate justice" rules, should instead be active and implement climate solutions and justice solutions. We need solutions, not just more processes for getting solutions. When the ship is sinking we need all hands floating the boat, not re-arranging deck chairs.