

LEAGUE OF WOMEN VOTERS OF HONOLULU

Statement on Proposed Water Quality Standards

Department of Health, May 19, 1967

As interested observers and participants in the development of water quality standards for Hawaii, and particularly for Oahu, the League of Women Voters of Honolulu wishes to commend Mr. Robert Dodge for the manner in which he has carried out his responsibilities as hearing Master.

We concur with Mr. Dodge that the best present and future use for the bulk of our coastal waters would fall under classes A and B, and we recognize the necessity for the C and D categories. On this basis we support the classifications and quality standards as recommended by the Master.

We do have reservations, however, as to the methods which have been proposed for achieving these standards. Our organization urges that reconsideration be given to the enforcement and implementation plan outlined by the Department of Health. While recognizing that the plan seeks to achieve a high level of conformity with the established standards, we are concerned that it may fall short of its objectives for the following reasons:

1. No provisions are made for public hearings or citizen information and participation.
2. The continuing responsibility of the State agency in identifying and evaluating sources of pollution is not well defined, nor has any provision been made for enlarging the agency's facilities to undertake this basic obligation.
3. We find inadequate the plan for continuing cooperation and exchange of information by Federal, State, City-County and private agencies concerned with the program of water pollution control and abatement.
4. Section 7 of Chapter 37 of the public health regulations does not provide effective sanctions for non-compliance.

1. PUBLIC HEARINGS; CITIZEN INFORMATION

Since the greater share of the cost of pollution abatement will be borne by the public through increased taxes, and possibly increased product costs to consumers, we feel that citizen participation should be an important factor in the implementation of the program. The people who live in our state were given an opportunity to help set our water quality standards through the hearings which have just been concluded. The citizens have an equal stake in how final standards are implemented. Specific information should be available to the public, through routine publication, as to what waters are being polluted, to what extent, and by whom; and most especially as to applications received and permits issued for non-compliance with the established standards. We suggest that the granting of these permits to pollute might follow the parallel of the safeguards of publication and public hearing which customarily follow any application for building variance or rezoning.

2. ROLE OF THE STATE AGENCY

The Department of Health proposal does not provide a specific program for continuing official sampling of all of the waters about which so many individuals, organizations and agencies have expressed concern. If we are to have any reasonably accurate picture of our overall problem of water pollution, and the progress we are making in its control, the responsibility for testing, analysis and evaluation should be vested in a single agency, adequately funded and staffed to conduct the program. The present proposal suggests that those who are polluting the water should be responsible for establishing, through sampling, the areas and degrees of that pollution. The Honolulu League does not feel that self-surveillance is a proper remedy to secure abatement of water pollution, nor should the State abrogate its basic obligation to evaluate as well as to enforce. We venture to suggest that the Department of Health might find it useful to establish a system of sampling that would be frequent, varied by day and by time of day, and taken under diverse weather conditions.

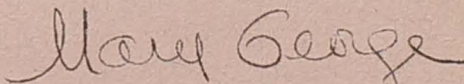
3. INTER-AGENCY COOPERATION

Defining and restricting water pollution is rather like putting water itself into a sieve; it has no respect for political or jurisdictional boundaries. When pollution of our waters may come from Federal, State, City-County or individual sources, or any combination of these, it seems to us important that some provision be made for continuing inter-agency cooperation. Without a definite program for the exchange and pooling of necessary information, and for mutual agreement as to enforcement and implementation, the quality standards which we so heartily endorse could well stay on paper instead of in the water, where we need them.

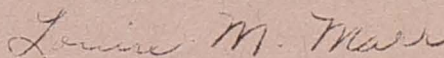
4. SANCTIONS

We suggest that any proposal for the enforcement and implementation of water quality standards should include meaningful sanctions in the case of non-compliance. While we think that the approbation or disapproval of a well-informed public provides a strong incentive toward the correction of pollution, it seems to us possible that the occasion may arise in which this is not sufficient. We hope the final recommendation will strengthen the provisions for appropriate sanctions.

The League of Women Voters of Honolulu appreciates your attentive response to our concern. If our organization can serve usefully in any way in achieving the ambitious program you now have under consideration, we would feel our assistance to be a privilege.



Mrs. Flave George, President



Mrs. John C. Marr, Chairman, Water Resources Committee

Statement delivered by Mrs. Kenneth Shutt, member of the Water Resources Committee, League of Women Voters of Honolulu

LEAGUE OF WOMEN VOTERS OF HONOLULU

SUPPLEMENTAL STATEMENT ON PROPOSED WATER QUALITY STANDARDS

For the Public Hearing on June 23, 1967
Department of Health, 1250 Punchbowl Street, Honolulu

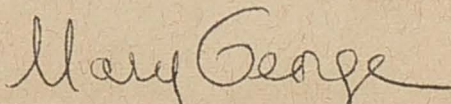
The League of Women Voters of Honolulu is grateful for this opportunity to express its appreciation of the changes submitted by Mr. Robert Dodge at the suggestion of the review panel of the Federal Water Pollution Control Administration in the final proposals for water uses and water quality standards, as well as the proposed changes in the implementation and surveillance program.

Provisions for citizen information and participation are now spelled out. The continuing responsibility of the State in identifying and evaluating sources of pollution is more clearly defined, as is the water sampling procedure. There is also more specific reference to the necessity for inter-agency cooperation in establishing the joint programs required for the achievement of the quality standards. The enforcement sanctions on permit violators are stated in more definite terms.

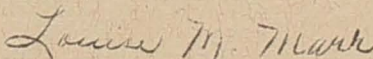
These changes strengthen implementation and enforcement in the areas of concern we expressed in our testimony for the hearing conducted on May 19, 1967.

We find the proposed changes in letter classification to be matters of terminology rather than substance, and concur with the more precise definitions thus provided.

Our organization, therefore, urges the adoption of the changes proposed by the hearing master.



Mrs. Flave George
President



Mrs. John C. Marr
Chairman, Water Resources Committee