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GREEN GOALS AND GREENBACKS: STATE LEVEL ENVIRONMENTAL REVIEW PROGRAMS AND THEIR ASSOCIATED COSTS

By STUART L. HART & GORDON A. ENK
Boulder: Westview Press, 1980. Pp. 363. \$26.00

Students of American natural resources management generally focus their attention on federal policy-making, giving fairly short shrift to state-level policy processes. Aside from studies of land use control, an area long under local government jurisdiction that many states invaded during the rise of environmental concern in the early 1970s, there is little research on state environmental policy and administration. In this book Hart and Enk examine state "little NEPAs" —laws or regulations modeled on the environmental impact statement requirement of section 102(2)(c) of the National Environmental Policy Act. The book is thus quite valuable because it deals with environmental programs at the state level and because those programs parallel the federal NEPA process that played such an important role in natural resources policy-making in the 1970s.

Green Goals and Greenbacks examines the procedures and costs of implementing state environmental policy acts. Eighteen states have some environmental statement requirement, ranging from major programs such as California's, which was established by statute and affects a caseload of several thousand proposals each year, to the program established in Texas by administrative action of an interagency council, which has been virtually ignored by the Texas state bureaucracy.

Hart and Enk thoroughly describe state environmental statement procedures. Two of the five chapters compare 16 facets of state EIS programs, including the criteria that "trigger" state EIS requirements for a project, the scope and content statements are required to address, and the procedures for coordinating state environmental statements with federal EISs on the same proposal. Two other chapters contain capsule descriptions of the states' programs; these descriptions range in length from a dozen or more pages for each of the five major state programs (those of California, Washington, Massachusetts, Minnesota, and New York) to two or three pages for states with ineffectual programs (e.g., Texas, Maryland, and Indiana). The bulk of the information covers the period from 1975 through 1977. Because of the detail in these descriptive chapters and a lengthy appendix containing state environmental policy act "fact sheets," the book serves as an excellent handbook on state "little NEPAs."

The analysis of the costs involved in implementing state EIS requirements is not nearly so effective as the description of procedures. In the introductory chapter, Hart and Enk describe a fairly comprehensive cost accounting system that covers costs to project-sponsoring state agencies, agencies that monitor and review EISs, and nongovernmental organizations and individuals. The system also covers both direct implementation costs, such as costs of preparing and reviewing EISs, and indirect costs, such as the opportunity costs of delay and the costs of the uncertainty (or risk of disapproval) caused by an additional regulatory review of a proposal.

This cost accounting system is thorough and well balanced. It considers the effects of EIS reviews on the full range of affected parties. It also recognizes that some effects of EIS review, such as avoiding inflationary costs to consumers of inefficient projects or mitigating projects' adverse environmental impacts, may turn out to be beneficial (or, in the accounting system's terms, "negative costs"). Given a complicated scheme such as Hart and Enk's (the accounting matrix contains 190 entries), some readers may quibble about particulars. However, on the whole, the accounting scheme is very reasonable.

Since the accounting scheme is a good one, many readers will be disappointed that the authors do not apply it in a straightforward manner. It proved unfeasible for the authors to collect information on the costs accruing to nongovernmental participants in state EIS processes. This omission, though frustrating, is understandable. However, the authors devote only six pages of analysis, at the beginning of the second chapter comparing the various facets of state EIS procedures, to the material they do have on state government agencies' EIS-related costs. The capsule sketches of the 18 states' EIS programs contain some treatment of costs, but these treatments are not very comparable with each other, nor do they fit into the authors' accounting scheme. Some states' costs are tabulated on a programmatic basis, others on a line-item basis, still others on a personnel-cost basis, and one even on a per-EIS basis. One suspects that many state agency officials returned the authors' 21-page questionnaires with incomplete or uninterpretable data, though the authors never refer to such data-collection difficulties. In any case, the reader is left with a very unsystematic sense of comparative costs among the 18 "little NEPA" states.

Green Goals and Greenbacks is reproduced directly from a typed manuscript, which might lead one to quibble with its \$26 price tag. Spartan production values are understandable for such a specialized research report, but the omission of a conclusion is not. The capsule description of the 18th state's (Wisconsin's) environmental statement

process is followed directly by the footnotes and appendices. In lieu of a conclusion, Hart and Enk sprinkle 16 recommendations through the two chapters in which the various facets of state EIS processes are analyzed, but these recommendations are not clearly based on the material presented in the book. That material neither supports nor contradicts the recommendations. Those recommendations reflect the biases of two supporters of NEPA-style reforms—biases with which this reviewer is *wholly* sympathetic, but biases nonetheless—and are no substitute for a carefully argued set of conclusions.

Readers interested in state-level environmental management and the implementation of NEPA-style mandates are thus left with less than they might have hoped for. While *Green Goals and Greenbacks* will not resolve any public policy debates about “the excessive costs of environmental red tape,” it will serve the lesser, but very important, need for a handbook on state “little NEPA” programs.

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