

**STATE OF HAWAII  
HAWAII CLIMATE CHANGE MITIGATION & ADAPTATION  
COMMISSION  
POST OFFICE BOX 621  
HONOLULU, HAWAII 96809**

**Co-Chairs:**  
Chair, DLNR  
Director, OPSD

**Commissioners:**  
Chair, Senate AEN  
Chair, Senate WTL  
Chair, House EEP  
Chair, House WAL  
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Chairperson, DOA  
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Director, DOT  
Director, DOH  
Chairperson, DOE  
Director, C+C DPP  
Director, Maui DP  
Director, Hawaii DP  
Director, Kauai DP  
The Adjutant General  
Manager, CZM

**Testimony of  
LEAH LARAMEE  
Climate Change Coordinator on behalf of  
Climate Change Mitigation and Adaptation Commission Co-Chair Mary Alice Evans and  
Co-Chair Dawn N.S. Chang**

**Before the Senate Committee on  
PUBLIC SAFETY AND MILITARY AFFAIRS**

**Monday, February 10, 2025  
3:00 PM**

**State Capitol, Conference Room 225 & Videoconference**

**In consideration of  
SENATE BILL 626  
RELATING TO DISASTER PREPAREDNESS**

Senate Bill 626 prohibits the planting of large trees along evacuation routes, requires the Hawai'i Emergency Management Agency to identify large trees along evacuation routes and trim, spray, or remove large trees having the potential to obstruct an evacuation route and defines evacuation route. **The Hawai'i Climate Change Mitigation and Adaptation Commission (Commission) offers the following comments.**

The Commission consists of a multi-jurisdictional effort between 20 different departments, committees and counties with the purpose of promoting ambitious, climate-neutral, culturally responsive strategies for climate change adaptation and mitigation in a manner that is clean, equitable and resilient. The Commission recognizes that ensuring safe and reliable evacuation routes is critical, especially as the frequency and intensity of climate-driven disasters increase.

However, the Commission also notes that urban and municipal trees provide significant benefits for climate resilience. Trees themselves sequester carbon which mitigates the impacts of climate change. Hawai'i municipal trees store 25,529 tons of carbon dioxide, remove a net 3,340 tons of carbon dioxide each year valued at \$22,314, and manage 35 million gallons of stormwater runoff each year valued at \$350,104. These trees mitigate the impacts of climate change while also helping our communities adapt to climate impacts such as hotter temperatures and declining trade winds by providing shade and mitigating the urban heat island effects. Eliminating our municipal

trees and prohibiting the planting of new trees will have negative effects on our communities and the climate of Hawai‘i.

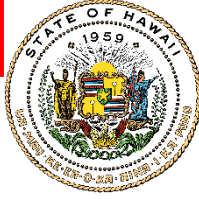
Thank you for the opportunity to testify on this measure.

JOSH GREEN, M.D.  
GOVERNOR | KE KIA'ĀINA

SYLVIA LUKE  
LIEUTENANT GOVERNOR | KA HOPE KIA'ĀINA



**LATE**



**STATE OF HAWAII | KA MOKU'ĀINA 'O HAWAI'I  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
KA 'OIHANA KUMUWAIWAI 'ĀINA**

P.O. BOX 621  
HONOLULU, HAWAII 96809

**DAWN N.S. CHANG**  
CHAIRPERSON  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT

**RYAN K.P. KANAKA'OLE**  
FIRST DEPUTY

**CIARA W.K. KAHANE**  
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES  
BOATING AND OCEAN RECREATION  
BUREAU OF CONVEYANCES  
COMMISSION ON WATER RESOURCE  
MANAGEMENT  
CONSERVATION AND COASTAL LANDS  
CONSERVATION AND RESOURCES  
ENFORCEMENT  
ENGINEERING  
FORESTRY AND WILDLIFE  
HISTORIC PRESERVATION  
KAHOOLAWE ISLAND RESERVE COMMISSION  
LAND  
STATE PARKS

**Testimony of  
DAWN N. S. CHANG  
Chairperson**

**Before the House Committee on  
PUBLIC SAFETY AND MILITARY AFFAIRS**

**Monday, February 10, 2025  
3:00 PM**

**State Capitol, Conference Room 225 and Via Videoconference**

**In consideration of  
SENATE BILL 626  
RELATING TO DISASTER PREPAREDNESS**

Senate Bill 626 prohibits the planting of large trees along evacuation routes; requires the Hawai'i Emergency Management Agency to identify large trees along evacuation routes and trim, spray, or remove large trees having the potential to obstruct an evacuation route; defines evacuation route; and appropriates money. **The Department of Land and Natural Resources (Department) offers comments.**

While the Department appreciates the intent of ensuring safe and efficient evacuation routes during disasters, this bill raises several significant concerns:

**1. Environmental and Climate Impacts**

Trees are critical in reducing urban heat, absorbing carbon dioxide, and mitigating climate change. Large trees provide essential shade, reducing surface temperatures and energy costs while improving air quality. Removing mature trees without a clear replanting strategy would negatively impact Hawai'i's environment and residents' well-being.

**2. Erosion and Stormwater Management**

Large trees stabilize soil and reduce erosion risk, particularly in coastal and low-lying areas prone to flooding. Their removal could increase runoff, sedimentation in waterways, and vulnerability to storm surges—ironically exacerbating the disasters this bill aims to address.

**3. Negative Impact on Community Aesthetics and Cultural Significance**

Many of Hawai‘i’s tree-lined roadways are functional and hold cultural and historical significance. The arbitrary removal or restriction of tree planting could diminish the scenic beauty of our state and erode the sense of place that is so important to locals and visitors.

**4. Lack of Scientific Justification**

The bill does not provide clear criteria for determining which trees pose a legitimate hazard. The assumption that all large trees are obstructions is overly broad and does not account for factors such as tree species, root structure, or wind resistance. A more nuanced, science-based approach—such as selective pruning and strategic planting—should be considered instead of a blanket prohibition.

**5. Lack of Acknowledgement of Invasive Trees**

The bill does not acknowledge the existence of invasive trees growing voluntarily and the risks they impose. Albizia, for example, are not planted along roadways but grow vigorously and numerous along roadways across the state. Albizia can grow 15 feet per year and have shallow root structures and weak branch attachments, making them highly hazardous. Albizia trees have blocked roadways and trapped community members, for example, on Hawai‘i Island following Hurricane Iselle in 2014. A more discerning approach to tree removal that prioritizes the removal of Albizia and other invasive trees could be more effective in achieving the intention to safeguard communities.

**6. High Costs and Burdens on Landowners**

The bill mandates the trimming, spraying, or removal of trees without addressing the financial and logistical burdens this would place on private landowners, state agencies, and local municipalities. Such a policy's ongoing maintenance and enforcement would require substantial funding, which could be better allocated to other disaster preparedness measures, such as improving emergency communication systems and strengthening evacuation infrastructure.

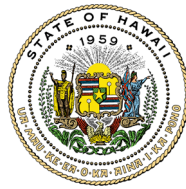
**7. Alternative Solutions**

Instead of outright prohibitions and removals, the following alternatives should be considered:

- Conducting comprehensive risk assessments to identify specific high-risk trees rather than broadly targeting all large trees.
- Implementing best practices in urban forestry, such as proper pruning, storm-resistant tree selection, and responsible planting guidelines.
- Strengthening community-based disaster preparedness initiatives to ensure residents are educated on evacuation procedures without unnecessarily sacrificing environmental resilience

Thank you for the opportunity to comment on this measure.

JOSH GREEN, M.D.  
GOVERNOR  
KE KIA'ĀINA



STEPHEN F. LOGAN  
MAJOR GENERAL  
ADJUTANT GENERAL  
KA 'AKUKANA KENELALA

JAMES DS. BARROS  
ADMINISTRATOR OF  
EMERGENCY MANAGEMENT  
KAHU HO'OMALU PŌULIA

STATE OF HAWAII  
KA MOKU'ĀINA O HAWAI'I  
**DEPARTMENT OF DEFENSE**  
**KA 'OIHANA PILI KAUA**  
HAWAI'I EMERGENCY MANAGEMENT AGENCY  
4204 DIAMOND HEAD ROAD  
HONOLULU, HAWAI'I 96816-4420

STATE OF HAWAI'I  
DEPARTMENT OF DEFENSE  
HAWAI'I EMERGENCY MANAGEMENT AGENCY

TESTIMONY ON SENATE BILL 626  
RELATING TO EMERGENCY MANAGEMENT

BEFORE THE SENATE COMMITTEE ON  
**PUBLIC SAFETY AND MILITARY AFFAIRS**

BY

JAMES DS. BARROS  
ADMINISTRATOR  
HAWAI'I EMERGENCY MANAGEMENT AGENCY

FEBRUARY 10, 2025

Aloha Chair Elefante, Vice-Chair Wakai, and Members of the Committee:

Thank you for the opportunity to submit a testimony in **OPPOSITION** of Senate Bill 626.

I respectfully submit this testimony in opposition to Senate Bill 626, which proposes to implement several new measures to address the planting of large trees along evacuation routes. While we understand the intent of the bill – ensuring immediate evacuation during emergencies, especially in seismic and tsunami risks that we face – I believe that this proposal may have significant unintended consequences, both for the safety and long-term resilience of Hawai'i communities.

HIEMA is committed to actively supporting any initiative aimed at enhancing and securing the structures and real property of all residents in the state of Hawai'i. However, HIEMA's focus must remain on comprehensive emergency management strategies, not the continuous identification and maintenance of trees along evacuation routes. The bill does not appropriately account for the need for emergency management resources to remain adaptable to changing conditions, such as the emergence of new evacuation routes or other critical needs during natural disasters.

Local governments and private landowners may resist the forced removal of trees, particularly when such actions conflict with local tree preservation laws or community aesthetics.

Furthermore, Hawai'i's unique ecosystems rely on the preservation of natural resources, including large trees, which play a crucial role in maintaining soil integrity, mitigating flooding, and fostering biodiversity. HIEMA, while focused on public safety, does not have the environmental expertise to assess these ecological effects comprehensively.

The requirement to compile and maintain a registry of trees, as well as to monitor and remove trees deemed obstructive, would require a significant allocation of time, resources, and personnel.

Thank you for the opportunity to provide testimony on Senate Bill 626.

James Barros: [james.barros@hawaii.gov](mailto:james.barros@hawaii.gov); 808-733-4300

**SB-626**

Submitted on: 2/10/2025 9:10:41 AM

Testimony for PSM on 2/10/2025 3:00:00 PM

**LATE**

Submitted By	Organization	Testifier Position	Testify
Karen J Comcowich	Individual	Oppose	Written Testimony Only

Comments:

Aloha Senators,

Please oppose SB626. As a Lahaina resident, I understand the reason a bill like this was proposed. However this proposal is advocating for an ax when an arborist is more appropriate. Large well maintained trees along roads are essential for community character, heat mitigation and beauty. The large trees in Lahaina offered the only cool spots on long hot walks through town. Shade structures do not offer the same cooling benefits.

Please plan for the future by advocating for appropriate tree care and funding for more arborists on in the DOT and on Maui.

Mahalo for your thoughtful consideration,

Karen Comcowich

Lahaina, HI