April 26, 1983

District Engineer (PODCO-O)
U.S. Army Corps of Engineers
Building 230
Pt. Shafter, Hawaii 96858

Dear Sir/Madam:

PODCO permit notices 1721-S and 1725-S were recently received for review by the Environmental Center. While we do not ordinarily review actions outside the State of Hawaii, the actions described in PODCO-O 1721-S and 1725-S are unusual and of special concern.

The actions for which the permits are requested are not water dependent, i.e., they are for house site foundations, yet require Corps approval because such foundations will be constructed in the coastal waters. These proposed actions are the most recent in a series of landfill projects for individual family use in this area and on similar Pacific islands. We understand that the level of poverty of most of the applicants in these actions makes it very difficult to justify denying any individual permit. However, the cumulative environmental impact of these actions may be substantial. Further, the continued granting of these permits may establish this means of "making land" as accepted practice, attracting additional settlers and additional development, and exacerbating the environmental impacts. For these reasons, it would seem highly appropriate for the Corps of Engineers to conduct a regional analysis of the individual islands where these landfill practices are being requested to identify where filling can be allowed with minimal social and environmental impacts.

Does the Corps have a procedure that could permit the combined assessment of the impacts of a number of individual fill activities within a region? Such a procedure would allow the consolidation and systematic evaluation of the social and environmental impacts associated with these fill operations. Hopefully, with a regional perspective and clearly understood and well publicized permitting criteria, it will be possible to avoid the necessity for pernicious individual denials or long term cumulative environmental detriment.

AN EQUAL OPPORTUNITY EMPLOYER
If we can be of assistance to you in this matter, please do not hesitate to contact us.

Yours truly,

Doak C. Cox
Director

cc: Jacquelin Miller
    Lee Hannah