District Engineer (PODCO-O)
U.S. Army Corps of Engineers
Building 230
Fort Shafter, Hawaii 96850

Dear Sir:

PODCO-O 1735-S
Application for Department of Army Permit
Stream Channelization, South Halawa Stream
Halawa, Oahu

The need for the proposed improvements to control flood and erosion of South Halawa stream appear necessary due to hydrologic and engineering considerations. The method of stream channelization may be inappropriate considering the fauna present in South Halawa stream. This Environmental Center review of the proposed project has been prepared with the assistance of James Parrish, Hawaii Cooperative Fishery Research Unit; Jacquelin Miller and Mark Ingoglia, Environmental Center.

In the Revised Environmental Impact Statement for Halawa Medium Security Facility the stream is described as being "intermittent." In the Fish and Wildlife Services Publication: Stream Channel Modification in Hawaii Part A: State Wide Inventory of Streams Habitat Factors and Associated Biota, the Halawa stream system is defined as being interrupted until it flows down to the major southern tributary of Halawa Stream. Although the stream quality is documented as being Class III, "moderate to low natural quality", there is reference to the exotic crayfish Procambus clarkii. Clearly, the biological resources of the stream portion to be channelized are minor, yet some aquatic stream fauna are present at various time intervals.

Under Section 5 of the PODCO it is stated: No significant adverse impacts are anticipated to the biological environment. However, if plans are not modified, any stream fauna presently surviving in the existing altered stream environment will have little chance for survival after the wide flat concrete channelization project is completed. The documentation of the effect these wide flat concrete channels will have on the stream fauna is thorough. With the addition of a low flow channel within the proposed channelization project what stream fauna is present will have chance to survive after the Hydrologic-Engineering characteristics of the stream are improved to accommodate storm runoff. Is it possible that a low flow channel could be incorporated into the design to accommodate the remaining stream fauna?

It is regretable that so many of Oahu's streams have been irreversibly damaged due to intentional as well as incidental alterations. What little stream life survives is often then considered insignificant. As a result the quality of Hawaiian stream life continues
to go from an altered stream environment to a completely uninhabitable cement channel which even the most hardy of exotics can not survive.

Thank you for the opportunity to review the above cited PODCO.

Yours truly,

[Signature]

Doak C. Cox
Director

cc: James Parrish
Jacquelin Miller
Mark Ingoglia