MEMORANDUM

TO: Environmental Quality Commission
FROM: Jacquelin Miller, Acting Director
RE: EIS Exemption List Proposed by the University of Hawaii
EQC Bulletin, May 23, 1976

In accordance with our standard review procedures the above cited exemption list was distributed to a number of University personnel for their review and comments. The following members of the University community have assisted in the preparation of this review: Ruth Gay, Botany Department; Ray Tabata and Janie Patch, Marine Advisory Program; Shirley Trefz, Leeward Community College; Margaret Stanzione and Jacquelin Miller of the Environmental Center.

Class 1:

Item e. We see no problem with utilizing existing public or private facilities for instructional and administrative purposes for ongoing programs, however, this action is questionable when implementing new programs and colleges to the University system. The introduction of a new program or college into an area may have significant impacts socially, economically, and subsequently on the environment. The concept of a college is on a considerably larger scale than a program, and the establishment of a new college on existing facilities may carry with it a commitment to future expansion and development to maintain and facilitate its growth. Upon this basis, the exemption requested under item e seems inappropriate in its present format.

We would like to recommend that the words "new" and "colleges" be deleted from this exempt action.

Class 2:

Item a. This statement is too general. Some limit on size and a description of use should be added.
Class 3:

Item a. The purpose should be noted. Will the temporary structures and facilities be used as offices, classrooms, residences, etc.? Also, designation of location would be desirable, as construction in non-urban areas could result in significant adverse impacts.

Item b. Seating capacity limits should be given. Large bleachers may lead to excessive noise and traffic congestion in some areas.

Item c. Outdoor lights and speakers may affect adjacent residential areas adversely. Lights on the summit of Mauna Kea should be excluded from exemption.

Class 4:

This section should be clarified and/or quantified. The degree and extent of plant removal, stock piling of fill materials, excavations, land fills, grading and ground treatment can all have environmental impacts, and therefore limits should be set on the size or amounts involved in a project requiring any of these actions. To be exempt, any one of these actions should be relatively small in size and should not be part of a larger project.

Item a. Planting, pruning, and removal of endangered species should be excluded from this exemption.

Item b. The methods of preparation of planting areas should be specifically stated. What is involved in preparation? Bulldozing? Transfer of large amounts of soil?

Item d. Could examples or purposes be stated here to reduce the generality of the statement?

Item e. Excavations for drainage, sanitary, mechanical, communication, and electrical systems on Mauna Kea, Haleakala, and other similar non-urbanized areas should be excluded from exemption.

Class 5:

Item a and Item b. Limits on the amount of collecting should be included.

Item c and Item d. What kinds of "electronic devices" and "equipment"?

Item e. Would the "disposal" of radioactive materials be included as a "use"? Are existing regulations and statutes with regard to the use of radioactive materials sufficient to assure the required environmental protection if such use is granted an exemption under these regulations?

Class 6:

Item b. Performance of research, instruction, public service, and support functions do not seem to be "administrative activities."
Item c. "Procurement and use of utility services" does not seem to be an administrative activity. Furthermore, when applied to the astronomy installations on Mauna Kea, this item seems inappropriate as an exemption.

Class 6:

Item d. "Receipt and storage of supplies and equipment" should have "in existing facilities" added to it.

Item f. Should procedures for the hiring of faculty and staff be included in an EIS? What is meant by "procedures"?

Class 7:

Item b. There should be a limit to the size of a parking lot that can be built without an environmental assessment.

Class 8:

This section should only be allowed to apply to interior alterations that would facilitate existing programs. A structure should not be remodeled in such a way that it can serve a different purpose without appropriate environmental assessment of that purpose.

Item c. Repairs to "culverts" are not appropriate exemptions under class 8 "interior" alterations. This exempt action request should be moved to class 1.

Class 9:

Item b. Does not seem appropriate under "demolition." The sentence could be revised to read, "Removal of demolition debris."

Item c. Does not seem appropriate under "demolition." It should be deleted unless an appropriate disposal method or site is described.

We appreciate the opportunity to have reviewed this exemption list and hope you will find our comments useful in your consideration of the requested actions.

Jacquelin Miller
Acting Director

cc: OEQC
Roy Takeyama
Contributors