



University of Hawaii at Manoa

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Office of the Director

December 1, 1978

RR:0060

Mr. Donald Bremner, Chairman
Environmental Quality Commission
550 Halekauwila Street
Honolulu, Hawaii 96813

Dear Mr. Bremner:

Review of Exempt Action Lists

The Environmental Center has been assisted in the review of the following exempt action lists by John Hylin, Agricultural Biochemistry; Ken Lowry, Urban and Regional Planning; Jacquelin Miller, Barbara Vogt, and Margaret Kimmerer, Environmental Center.

BOARD OF WATER SUPPLY, HONOLULU

Class 1: 35, 36, 37. Operations, Repairs, Maintenance

The requested exemptions for routine mechanical maintenance are appropriate. If pesticides and herbicides are to be used, however, we suggest that the locations, chemicals, areas, targets and frequency of application should be defined. An exemption with no limit as to the area of ground to be treated permits the possibility of treatment on a scale which could prove detrimental to the environment.

The designation of Classes A, C, and E should be replaced with the appropriate class numbers (1, 3, and 5) to be consistent with the regulations (EIS regulations 1:33 a, d).

Supplemental List

We appreciate this response to our earlier concerns and find the supplemental information adequate to justify exempt status.

UNIVERSITY OF HAWAII

Class 4(b). Grading and Stockpiling

The exemption should be limited to permit up to 500 cubic yards of material to be stockpiled in accordance with county ordinances. Grading to permit up to a complete playfield area should not be exempt. Projects of this magnitude would most probably have some significant effects on the environment.

Class 5(g). Storage of Flammable and Combustible Liquid

We suggest that storage of flammable and combustible materials be included under Class 1.

Since 5,500 gallons is such a large number, it seems appropriate to request the specific kinds of flammable and combustible liquids being exempt.

Class 7(a). Various Structures

We understand the purpose of this exemption is to permit the construction of storage and utility structures; therefore, we suggest rewording the proposed exemption to be more specific. For example, "storage and utility structures not to exceed 500 square feet...."

Class 7(d). Recreational, Fields, Courts and Bleachers

If the intent of this exemption is operation and maintenance then the exemption is appropriate under Class 1. If it is to exempt new construction of playfields including multiple combinations of such activities, then the exemption is inappropriate and we strongly recommend that the exemption request be denied. As presently worded, entire sports complexes covering many acres of land could be constructed without any form of environmental assessment. The exemption applies to all campuses of the University system, including those on the neighbor islands.

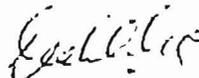
Providing parking needs and feeder street access for a 2,000 seat sports complex may result in significant physical and social environmental concerns.

HAWAII HOUSING AUTHORITY

Class 6(4). Acquisition of Land for Banking Purposes

We have no objections to the proposed exemption as long as it is clearly indicated that the applicable requirements of Chapter 343 will be met when an agency proposes to implement an action.

Yours truly,



Doak C. Cox
Director

DCC/ck

- cc: John Hylin
- Kem Lowry
- Jacquelin Miller
- Barbara Vogt
- Margaret Kimmerer