



University of Hawaii at Manoa

Environmental Center
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March 13, 1989
RP:0099

Mr. James K. Ikeda, Acting Chief
Environmental Protection
and Health Services Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Ikeda:

Water Quality Certification No. 126
Honolua Watershed Project
(Mahinahina Stream Channel and Appurtenant Structures)
Lahaina, Maui


The Environmental Center has conducted an in-house review of the above referenced document. The proposed action involves construction of Mahinahina Stream Channel and appurtenant structures to reduce sheet erosion/overland flooding of agricultural areas, sediment deposition on the Honolua Watershed flood plain and beaches, and sediment pollution of coastal waters caused by local rainstorms in Maui County.

Our major concern is the inappropriate use of a 1976 Environmental Impact Statement as a basis for data in this application: In the intervening years since this document was prepared, social, economic, and regulatory changes are likely to have occurred which have a bearing on the proposed project. For example, on page 63 of the EIS, it is stated that "[flood plain] restrictions are expected to be enacted once the necessary maps and flood plain data have been completed for this plain area." Are such restrictions now in place?

Incorporation of existing environmental documents into present actions is fully appropriate, as long as current data are supplied. In the present case, however, the need for updating is evident, and we recommend withholding approval until changes in social, economic, and other factors have been reviewed.

Thank you for the opportunity to comment on this document.

Yours truly,


John Harrison
Environmental Coordinator

cc: OEQC
L. Stephen Lau
Carolyn D. Cook