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Office of the Director

January 11, 1977

MEMORANDUM

TO: Environmental Quality Commission

FROM: Doak C. Cox *Doak C. Cox*

RE: Department of Accounting and General Services, Additional Items for EIS Exemption List from the EQC Bulletin, October 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: Lyndon Wester, Geography; Sheldon Varney, Educational Administration; and Mae Kato Pattison and Jacquelin Miller, Environmental Center.

Class II, Item 3. Fuel System. The exemption of fuel system replacement and reconstruction should be more specific as to the type, location, size and capacity of the fuel systems and the extent of such replacement and reconstruction for which no serious environmental consequences would be anticipated. See comments for Class III, Item 2.

Class II, Item 4. Drainage System. The scale and extent of replacing and reconstructing a drainage system which would have a negligible effect on the environment should be specified. See Class III, Item 3.

Class II, Item 5. Waste Treatment Facility. The replacement or reconstruction of a waste treatment facility, depending on the location, discharge volume, and physical structure of the plant could well have significant environmental consequences. We would suggest that if the impact will be negligible, then a very brief environmental assessment leading to a negative declaration decision would not create an undue burden on the agency. However, since potential impacts may be significant in some cases, a blanket exemption could be a serious precedent to establish.

Class II, Item 7. Roadway. The exemption of roadway replacement and reconstruction from environmental assessment should be more specific as to the type, location, magnitude and extent of the replacement and reconstruction which would have a negligible effect on the environment. See comments for Class III, Item 6.

Class II, Item 8. Parking Lot. The exemption of parking lot replacement and reconstruction from environmental assessment should be more specific as to the type, location, magnitude and extent of such a project. See comments for Class III, Item 7.

Class II, Item 9. Paved Court. The exemption of paved court replacement and reconstruction should be more specific as to the type, location, magnitude and extent of such activity in which serious environmental consequences would not be anticipated. See comments for Class III, Item 8.

Class III, Item 2. Fuel System. Gasoline and diesel tank and pump systems for the refueling of vehicles could have significant negative effects on the environment depending on their location, size and capacity. The exemption of this item from environmental assessment should specify clearly the type, location, size and capacity of such projects. A blanket exemption of this item without such specifications would be a serious precedent to establish.

Class III, Item 3. Drainage System. The construction, alteration and installation of a drainage system could have serious effects on the environment depending on its location, size and capacity. An exemption of drainage systems should be more specific and include such specifications which would limit exemptions only to types of drainage systems for which there would be no anticipation of serious environmental consequences. A blanket exemption would establish a serious precedent.

Class III, Item 6. Roadway. The development of roadways leading to greater onsite access could foreseeably generate a traffic increase as well as an alteration of the existing traffic flow and pattern depending on their location, capacity and design. The exemption of roadway construction, alteration and installation should be more specific as to the location, capacity and design of projects which would have negligible effects on the environment and be limited to areas where the above cited problems would not be generated. The blanket exemption of this item with no specifications or limitations would establish a serious precedent.

Class III, Items 7 and 8. Parking Lot/Paved Court. The construction, alteration and installation of parking lots and paved courts could well have serious environmental consequences depending on their location, magnitude and capacity. The drainage problems associated with such developments must also be considered. These items should not be considered for exemptions from environmental assessment without clearly defined specifications as to their location, size and capacity. The blanket exemption of parking lots and paved courts of indeterminate size and capacity would be a serious precedent to establish.

Class III, Item 10. Portable Buildings. The construction, installation and removal of temporary wooden structures should be exempted at existing facilities only. They should not be excluded, however, from the total assessment of environmental effects of new facilities to which they are a part.

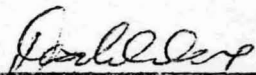
Class IV, Item 2. Grading and Grassing. The exemption of grading and grassing from environmental assessment should be more specific in limiting the size and location of such projects to areas where serious environmental consequences would not be anticipated. The exemption of modest-sized areas within already developed areas adjacent to existing structures for landscaping purposes seems appropriate. However, an unlimited exemption as that requested leaves open the possibility of grading and grassing at locations and on a scale of indefinite magnitude which could well have serious environmental effects such as erosion and improper drainage. Such an unlimited exemption would be a serious precedent to establish.

Class IV, Item 4. Weed and Pest Control. The exemption of ground treatment with herbicides and pesticides from environmental assessment should be limited to areas immediately adjacent to existing structures or ground treatment immediately prior to construction. An exemption with no limit as to the area of ground to be treated, however, permits the possibility of treatment on a scale which could prove detrimental to the environment. This would be a serious precedent to establish. Weed and pest control needs of the Department of Accounting and General Services should be considered in the ongoing evaluation of herbicide-pesticide useage and the EIS exemption procedures as we have suggested in our past reviews.

Class IV, Item 6. Cesspool and Dry Well. Because of their potential effect on the environment, cesspools and dry wells should not be provided without the prior assessment of their effects on the environment. We suggest that this item be deleted from the exemption list.

Class X, Items 1 and 2. Gymnasium and Auditorium Building Height/Parking Requirements. The exemption of these items would be in direct opposition to the letter and intent of the Environmental Quality Commission regulations and should be subject to environmental assessment. (1:33 a 10)

Thank you for the opportunity to review this exemption list. We will appreciate your consideration of our comments. .



Doak C. Cox, Director