



University of Hawaii at Manoa

Environmental Center
Crawford 317 • 2550 Campus Road
Honolulu, Hawaii 96822
Telephone (808) 948-7361

Office of the Director

February 4, 1981

RP:0017

Colonel Alfred J. Thiede
Corps of Engineers
Honolulu District
Room 205, Building 230
Fort Shafter, Hawaii 96858

Dear Colonel Thiede:

Special Public Notice
Proposed Categorical Exclusions for
Department of the Army Permit Applications

In accordance with the Corps of Engineers Policy and Procedures for implementing the National Environmental Policy Act, certain categories of actions which are not expected to have significant environmental impacts may be designated as "categorical exclusions" for Department of Army Permit Actions. In reviewing the above cited Public Notice we note in paragraph 2, Procedures, item d:

After adoption of the categorical exclusion categories, public notices for site specific permit applications falling within such categories shall state that the application is considered to be a categorical exclusion. All concerned agencies and the public will then have the opportunity to demonstrate that there are extraordinary circumstances where the normally excluded actions would have significant environmental effects, thus requiring the preparation of an EA or EIS.

Since several of the actions proposed for categorical exclusion have a high potential for producing significant impacts we are concerned as to the public review time available after the issuance of the public notice announcing the "site specific permit applications." Sufficient information and time should be provided to assure that informed public review of the permit application is possible prior to the issuance of the permit.

In addition to our concerns relative to the public review process we are also concerned with the procedure by which the Corps will determine whether or not an action will fall under the "categorical exclusion." Will Environmental Specialists within the Corps be assigned the responsibility of reviewing permit applications for "categorical exclusion" actions? The need for Environmental Specialists in this review seems essential to assure adequate evaluation of the proposed action.

Colonel Alfred J. Thiede


-2-

February 4, 1981

We recognize the need to expedite the permit processes and reduce unnecessary assessment for minor non-significant actions. We are concerned however with the somewhat blanket exemptions from environmental assessments that will be instituted under the "Categorical Exclusion" procedure.

We appreciate your consideration of our comments and look forward to your response.

Yours truly,



Diane C. Drigot, Ph.D
Acting Director

cc: Jacquelin Miller

bcc: OEQC
Charles Lamoureux
Ray Tabata
Ralph Moberly
Fris Campbell
Frans Gerritsen
Sheila Conant
Brent Gallagher
Bryce Decker
Alexis Cheong Linder
Ronald Renkoski