

## University of Hawaii at Manoa

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> January 9, 1987 RG:0070

Mr. James Morrow Environmental Council 465 South King Street, #115 Honolulu, Hawaii 96813

Dear Mr. Morrow:

Proposed Amendments to County of Maui Environmental Impact Statement Exemption List OEQC Bulletin - December 8, 1986

In reviewing the proposed amendments to the Maui County exemption list with the assistance of Matthew Spriggs, Anthropology Department, we note that they have requested an exemption under class #5 for Research Surveys, "including soil boring for exploration of subsurface and ground water exploration."

We suggest that this particular exemption is not appropriate. Archaeological surveys need to be conducted where "soil boring for exploration of subsurface and ground water exploration" will be conducted. These activities have frequently been shown to have significant impacts on archaeological resources at the drilling site and by bulldozing of access roads to reach such sites.

Significant impacts to the biota and soil stability have also resulted from access road construction in sensitive areas.

An environmntal assessment of the proposed well drilling sites would assure identification and awareness of these environmentally important considerations in the selection of specific drilling sites and access road alignments.

Yours truly,

Jacquelin Miller

Acting Associate Director

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cc: Stephen Lau
Matthew Spriggs