

Hijirida, Linda M.

From: HI Office of Environmental Quality Control
Sent: Thursday, April 09, 2015 10:21 AM
To: Wooley, Jessica E.; cmitche117@hotmail.com; prentissc001@hawaii.rr.com
Subject: FW: DLNR exemption list

Aloha All,

Forwarding comments OEQC received regarding DLNR's Exemption List.

Mahalo,

Linda Hijirida
OEQC Secretary
Phone: (808) 586-4185
Email: linda.hijirida@doh.hawaii.gov

-----Original Message-----

From: David Kimo Frankel [mailto:david.frankel@nhlchi.org]
Sent: Wed 4/8/2015 12:36 PM
To: HI Office of Environmental Quality Control
Subject: DLNR exemption list

DLNR's exemption list appears to be unnecessarily duplicative and expansive. But let me just address one of the proposed items:

Exemption Class 1 reads:

Operations, repairs or maintenance of existing structures, facilities, equipment, or topographical features, involving negligible or no expansion or change of use beyond that previously existing.

Item 48 reads:

48. Subdivision or consolidation of lots not previously subdivided.

How is the subdivision of lots considered the operation, repair or maintenance of existing structures? In fact, subdivision of land not only does not belong in exemption class 1, it should never be considered exempt. Subdivisions of land (1) generally result in increased intensity of land use and (2) can result in reduced public access.

Item 48 from exemption class 1 should be deleted.

David Kimo Frankel

Staff Attorney

Native Hawaiian Legal Corporation

1164 Bishop Street, Suite 1205

Honolulu, HI 96813

Tel: (808)521-2302

Fax: (808)537-4268

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