



University of Hawaii at Manoa

Environmental Center
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October 14, 1985

RP:0054

District Engineer (PODCO-O)
U.S. Army Corps of Engineers
Building 230
Fort Shafter, Hawaii 96858

Dear Sir:

Application for Department of the Army Permit
Watercress Farm Development at Waiawa Wetland
Aiea, Oahu

This project, for which a Corps of Engineers permit is being requested, involves the filling of an existing wetland with demolition and land clearing debris in order to utilize the land for watercress farming.

The Environmental Center prepared a brief in-house review of this project in August 1985, in response to a request from the Department of Land Utilization of the City and County of Honolulu (see attached). In response to the Corps of Engineers permit notice, we have now reviewed the environmental assessment and accompanying information with the assistance of Matthew Spriggs, Anthropology; Ted Norton, Pacific Biomedical Research Center; Martha Diaz and Walington Yee, Environmental Center.

Landfill Material

The potential of hazardous leachate from the wood debris entering adjacent waterbodies and ecosystems is of significant concern. There is no indication in the EA of the volumes of termicide treated wood that will be used as fill or if any effluents or crops from similar fill sites have been tested for the presence of pentachlorophenol, chlorinated cyclodiene type pesticides (chlordane, dieldrin, aldrin), copper, arsenic, or chromium. If no data is available, it would seem necessary that either an EIS or expanded environmental assessment be prepared to establish both the quality and quantity of the leachate and to include a discussion on the potential cumulative impacts to the biota of the wildlife refuge or the watercress crop.

Archaeology

Our reviewers have commented that the proposed project may cause compacting of subsurface deposits, thus impacting potential significant archaeological artifacts. Due to siltation, there is potential for significant subsurface data from this site. In the Pearl Harbor area, archaeology is little understood and fishponds have never been dated.

District Engineer

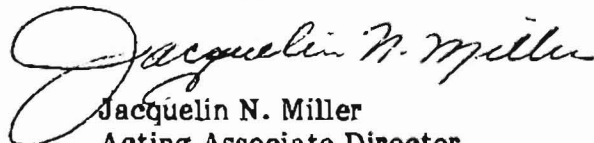
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A program of subsurface reconnaissance should be undertaken to assess the buried cultural remains. This may provide significant information on the archaeology of the area, which would otherwise be adversely impacted by dredging and filling. A closer examination of historical records to better interpret past land use and fishpond location is also recommended.

We appreciate the opportunity to offer our comments.

Yours truly,


Jacquelin N. Miller
Acting Associate Director

Attachment

cc: OEQC
Patrick Takahashi,
Acting Director, Environmental Center
Matthew Spriggs
Ted Norton
Martha Diaz
Walington Yee