



THE LIMTIACO CONSULTING GROUP  
CIVIL ENGINEERING AND ENVIRONMENTAL CONSULTANTS

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**December 16, 2020**

**Subject:** Pre-Assessment Consultation, Preparation of the Environmental Assessment for  
Proposed Irrigation System Improvements in Central O'ahu, Waialua and Wahiawa  
Districts, O'ahu Island, Hawai'i  
Tax Map Keys (1) 7-1-001:002, 7-1-001:005, 6-5-002:001 and 6-5-002:025

Dear Sir or Madam,

The Limtiaco Consulting Group, Inc. is preparing the Environmental Assessment (EA) for proposed irrigation system improvements in Central O'ahu in the Districts of Waialua and Wahiawa on O'ahu Island. We are soliciting comments on behalf of ADC for the pre-assessment consultation phase of the EA pursuant to Chapter 343, Hawai'i Revised Statutes and Title 11, Chapter 200.1, Hawai'i Administrative Rules of the Department of Health.

In 2012, the Trust for Public Land (TPL) in collaboration with the State of Hawai'i, the Office of Hawaiian Affairs (OHA), the City and County of Honolulu, the U.S. Army and D.R. Horton/Schuler (a private developer) acquired over 1,700 acres of land from the Estate of George Galbraith. TPL then transferred more than 1,200 and 500 acres to the State of Hawai'i Agribusiness Development Corporation (ADC) and OHA, respectively; these Galbraith Agricultural Lands may only be utilized for agriculture. ADC currently owns, operates, and maintains the Galbraith Irrigation System (GIS) that was utilized for many decades prior to 2004 to irrigate vast acreage in large-scale agricultural production (e.g., pineapple cultivation). Proposed irrigation system improvements are expected to improve the redundancy and reliability of the irrigation infrastructure in the affected area, which is necessary to increase the farmable acreage of parcels that are under ADC's jurisdiction including Tax Map Keys 7-1-001:002, 7-1-001:005, 6-5-002:001, and 6-5-002:025.

The plantation-era Bott Well is a deep-irrigation well pump station with a diesel-driven engine that provides the only water source for ADC's parcels at this time. Other water sources that ADC will consider for irrigation use include non-potable water from the Wahiawā Reservoir (which is also known as Lake Wilson) and the highest quality reclaimed water produced at the Wahiawā Wastewater Treatment Plant (WWTP). Treated effluent from the Wahiawā WWTP has been discharged into Wahiawā Reservoir since 1927 and mixes with impounded surface water from the upper reaches of Kaukonahua Stream. Wahiawā Reservoir receives water from and overflows into Kaukonahua Stream, which outlets at Kaiaka Bay near the town of Hale'iwa. Impounded water from Wahiawā Reservoir is currently utilized to irrigate downstream agricultural fields. Wahiawā Reservoir is also utilized as a fishery and serves as a sediment and flood control basin.

ADC's proposed irrigation system infrastructure will draw water from available sources, convey the water to storage reservoirs, and distribute the water via separate pipelines for non-potable and reclaimed water irrigation use (see Figure 1). Proposed improvements are expected to include a 14-million-gallon earthen berm storage reservoir on ADC's parcel, an intake pump

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station along Wahiawā Reservoir, interconnecting piping between various irrigation system components, and a backup disposal system for treated effluent that is required by the Department of Health to accept excess reclaimed water during wet weather events and off-specification reclaimed water. The reclaimed water pipeline from the Wahiawā WWTP is expected to include a segment that is installed under Wahiawā Reservoir to avoid impacting the water body and reservoir-related recreational activities. Proposed system improvements are expected to be accomplished in phases subject to the availability of funding.

The proposed irrigation system improvements will occur in an area of Central O'ahu that has a history of improvements related to agricultural endeavors. For example, the Wahiawā Dam is an earth and rockfill structure that was constructed in 1906 to impound surface water from the north and south forks of Kaukonahua Stream. The dam created the 7-mile long Wahiawā Reservoir. Impounded water is currently released in a controlled manner to irrigate agricultural land in Waialua and Hale'iwa and to reduce the hazard potential during heavy storms. The irrigation system improvements proposed by ADC will not disturb or occur near the Wahiawā Dam or its spillway. The use of reclaimed water for irrigation purposes in Central O'ahu is viewed by ADC as a long-term benefit that will help to conserve Oahu's other water resources for needed uses. The completion of irrigation water infrastructure that contributes to long-term agricultural production in Central Oahu is also considered by ADC to be a benefit.

You are welcome to provide input on the project at this time and we greatly appreciate input that assists us and project stakeholders in determining appropriate mitigation measures that may be warranted due to ADC's project. The enclosed location map is provided for your reference. We would greatly appreciate your response by January 20, 2021.

**Please send comments to:**

James Nakatani, Executive Director  
Agribusiness Development Corporation  
235 S. Beretania Street, Room 205  
Honolulu, HI 96813  
email: james.nakatani@hawaii.gov

**And please provide a copy to:**

Claire Oshiro, Environmental Planner  
The Limtiaco Consulting Group  
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Thank you for your interest and participation in the environmental review process. Should you have any questions, please contact me at (808) 687-8750.

Best regards,  
*The Limtiaco Consulting Group, Inc.*



Claire Oshiro  
Environmental Planner

