

January 15, 2018

HHF Planners
733 Bishop St
Honolulu, Hawaii 96813

LAND USE COMMISSION
STATE OF HAWAII

2018 JAN 22 P 1:47

re: Hawaiian Memorial Park Cemetery Expansion Project

To whom it may concern:

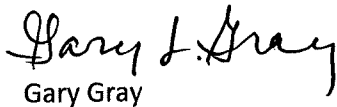
I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISPN) of November 2017. I opposed the HMP project in 2009 and I am still against it even it is a smaller petition area.

The main reason for my opposition is that the potential for runoff and erosion is still there. We live in the Kawa Stream watershed area and increased runoff and erosion seriously threatens the quality of Kaneohe Bay – which we have been trying to protect and preserve since the 1970's. In addition, I am concerned about rockfall hazards since the grading proposed in the new plan requires even steeper grader than the prior plan. My grandchildren now play in the Mahinui hills as their father did before them. This area was deemed conservation land for a reason – we need to protect our natural resources and preserve what we have left of our natural land.

Now, we have also learned that a previously unknown population of an endangered species has been discovered in the Petition Area. The population of the Blackline Hawaiian Damselfly was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. The EISPN states, "Technical studies will be conducted for the Draft EIS to address the presence of potential species in greater detail." But how will it be possible to protect such a fragile population with the proposed deforestation and grading in the new plan?

I live on Ohaha Street which is right below the petition area. I will personally affected by this project but I am even more concerned about the larger issues stated above

Sincerely,


Gary Gray

cc: State of Hawaii Land Use Commission
Dept of Business, Economic Dev. & Tourism

LAND USE COMMISSION
STATE OF HAWAII

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re: Hawaiian Memorial Park Cemetery Expansion Project

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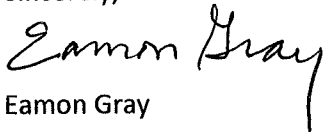
I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISP) of November 2017. I don't understand why HMP is doing this again to our neighborhood. The only answer is greed. Instead of looking at alternative burial practices they just want more plots to make more money. Ten years ago we told them NO and the LUC told them NO for very significant reasons:

Risks of runoff and erosion
Rockfall hazard to neighborhood
Destruction of the scenic area – the Kaneohe Greenbelt
Adverse water quality of Kaneohe Bay

Now we know that we have an endangered species in the Petition Area. The population of the Blackline Hawaiian Damsel was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. HMP continues to state that they will mitigate every concern we have with no specifics. How will this endangered species survive their latest proposed project?

Part of our family lot is on conservation land and we are protecting it. Why does HMP have the right to not uphold their responsibilities to the land?

Sincerely,


Eamon Gray

Cc: State of Hawaii Land Use Commission, Dept. of Business, Economic Development & Tourism

January 15, 2018

LAND USE COMMISSION
STATE OF HAWAII

2018 JAN 22 P 1:45

HHF Planners
733 Bishop St
Honolulu, Hawaii 96813

re: Hawaiian Memorial Park Cemetery Expansion Project

To whom it may concern:

I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISPN) of November 2017. I also submitted my concerns regarding the original Environmental Impact Statement almost 10 years ago and find it very disheartening that your company would continue to pursue changing the zoning in our neighborhood when we clearly expressed our opposition to any development in the conservation area. While the scope of your proposed development has been minimized the same issues remain. These issues were acknowledged by the Land Use Commission in 2009 when they denied your initial request:

Risks of runoff and erosion – “for Kaneohe Silty Clay, runoff is medium to rapid and the erosion hazard is moderate to severe.”

Rockfall hazard to neighborhood – the grading proposed in new plan requires steeper grading than the prior plan.

Destroy the scenic area - the Ko’olau Greenbelt would still be negatively impacted.

Adverse water quality of Kaneohe Bay – development of the Petition Area would still result in the removal of the secondary forest and a change to both runoff and chemical loads exiting the Kawa Stream watershed.

Additionally, since the original EIS, was written, a previously unknown population of an endangered species has been discovered in the Petition Area. The population of the Blackline Hawaiian Damselfly was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. The EISPN states, “Technical studies will be conducted for the Draft EIS to address the presence of potential species in greater detail.” No reference is made to proposed protections which would be absolutely necessary given the location of the one identified population and the deforestation and gradation processes involved in the project.

A fourth generation of my family is now living in our home on Ohaha Street which is adjacent to the petition area. My parents bought this house with the understanding that part of our lot and the surrounding area was conservation land. We wanted it that way then and we want it that way forever. We must protect our natural resources.

Sincerely,

Kathleen A. O'Malley

Kathleen O'Malley

cc: State of Hawaii Land Use Commission
Dept of Business, Economic Dev. & Tourism

45-423 Ohaha Street
Kaneohe, HI 96744

LAND USE COMMISSION
STATE OF HAWAII

2018 JAN 23 A 8:10

State of Hawai'i
Land Use Commission
Dept. of Business, Economic Development and Tourism
P.O. Box 2359
Attention: Mr. Scott Derrickson

Dear Mr. Derrickson,

In 2009, the Land Use Commission, unanimously denied Hawaiian Memorial Park's petition to expand. The findings of fact are as relevant today as they were in 2009. Although, HMP proposes to modify their expansion, this petition area continues to maintain historical, ecological and scenic values. We question the need to use technology to mitigate hazards when the simpler, less hazardous solution would be to not reclassify the land and not open it up to development which could pose potential health and safety risks.

Thank you for your time and consideration.

Sincerely,



Julianne McCreedy

LAND USE COMMISSION
STATE OF HAWAII

January 22, 2018

2018 JAN 23 A 8:07

Nathan Yuen
91-233 Hanapouli Cir #29T
Ewa Beach, Hawaii 96706
Email: 808nateyuen@gmail.com

HHF Planners
733 Bishop Street #2590
Honolulu, HI 96813

Ronald A. Sato, AICP, Senior Associate
email: rsato@hhf.com
457-3172

With a copy to:

Mr. Scott Derrickson
State of Hawaii
Land Use Commission
Department of Business, Economic Development and Tourism
PO Box 2359
Honolulu, HI 96804

Project: Docket Number: A17-804
Hawaiian Memorial Park Cemetery Project
Kane'ohe District, O'ahu, Hawaii
(1) 4-5-033: por.001 (Private Property)

Dear Sir or Madam:

I am responding to the Environmental Impact Statement Preparation Notice by Hawaiian Memorial Park.

I work as an accountant for an engineering consulting firm during the week but on the weekends I become an amateur naturalist, hiker, and photographer. For the past 20 years I have been venturing to remote parts of our islands to photograph the native plants and animals of the Hawaiian Islands many of which are rare or endangered. I have a blog – HawaiianForest.Com – which documents some of the rarest species on the planet.

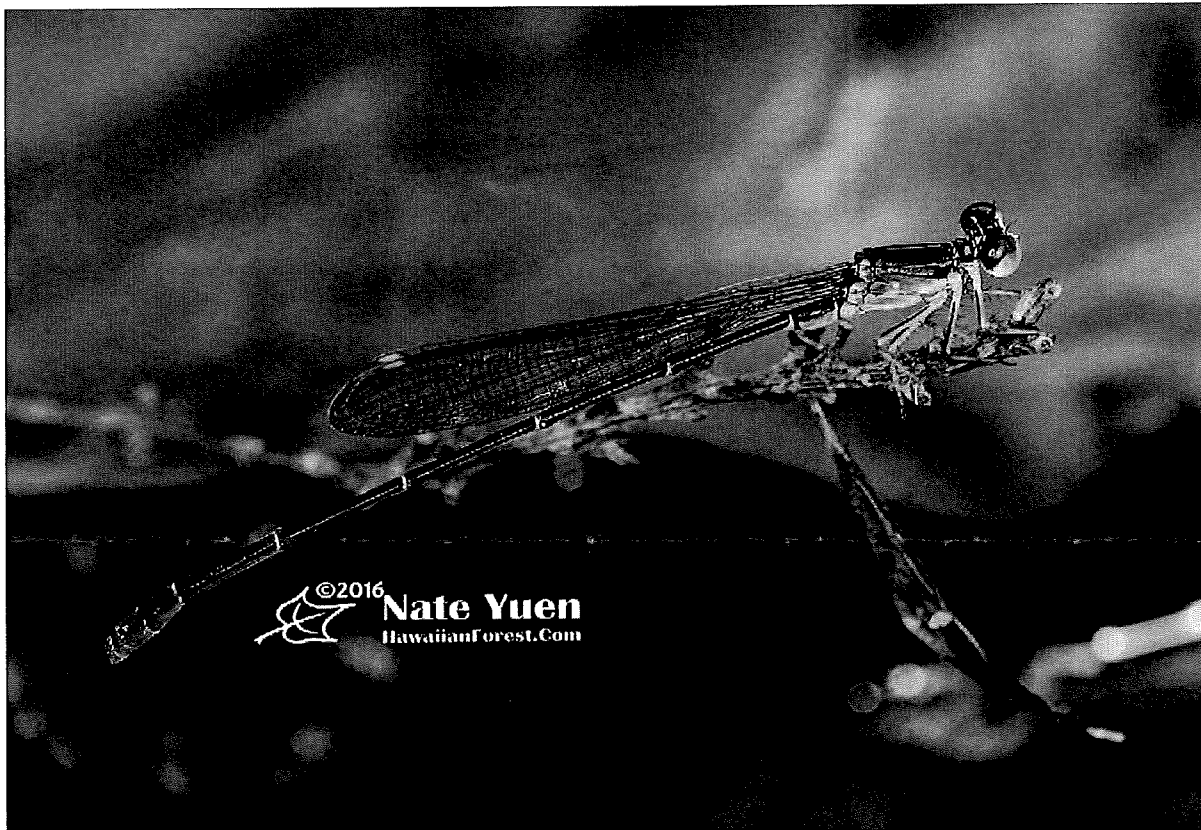
I served as a commissioner for the State of Hawaii's Natural Area Reserves System (NARS) Commission administered by the Department of Land and Natural Resources from 2013 to 2017. I currently serve as Conservation Chair for the Sierra Club of Hawaii Executive Committee. I am also a member of the Hawaiian Entomological Society.

In this matter, I am acting on my personal behalf as a private citizen. I was involved in the initial discovery and confirmation of the population of Blackline Hawaiian Damselflies — *Megalagrion nigrohamatum nigrolineatum* – on conservation land owned by Hawaiian Memorial Park.

My friend Patrick Shea was a candidate for State House of Representatives District 49 in the 2016 election. In June 2016, Patrick met Liam Gray while canvassing the homes on Ohaha Street. Liam told Patrick that he discovered a previously unknown population of endangered Blackline Hawaiian Damselflies in the backyard of Ernest and Bettye Harris on Ohaha Place who live adjacent to the land owned by Hawaiian Memorial Park. Patrick asked whether I could confirm the find and made arrangements for Liam to take us to the site.

On June 26, 2016, Liam Gray took me and several windward residents – Patrick Shea, Grant Yoshimori, Caitlyn Yoshimori, Rich McCreedy, and Julie McCreedy – to see the endangered damselflies. I was surprised to see these damselflies in Kāne'ohe. I had previously only seen this species of damselflies in native forests and streams above 2,000 feet elevation in the Ko'olau Mountain. I did not expect to see them at this low elevation in Kāne'ohe under alien trees – schefflera, albezia, strawberry guava, and other non-native vegetation.

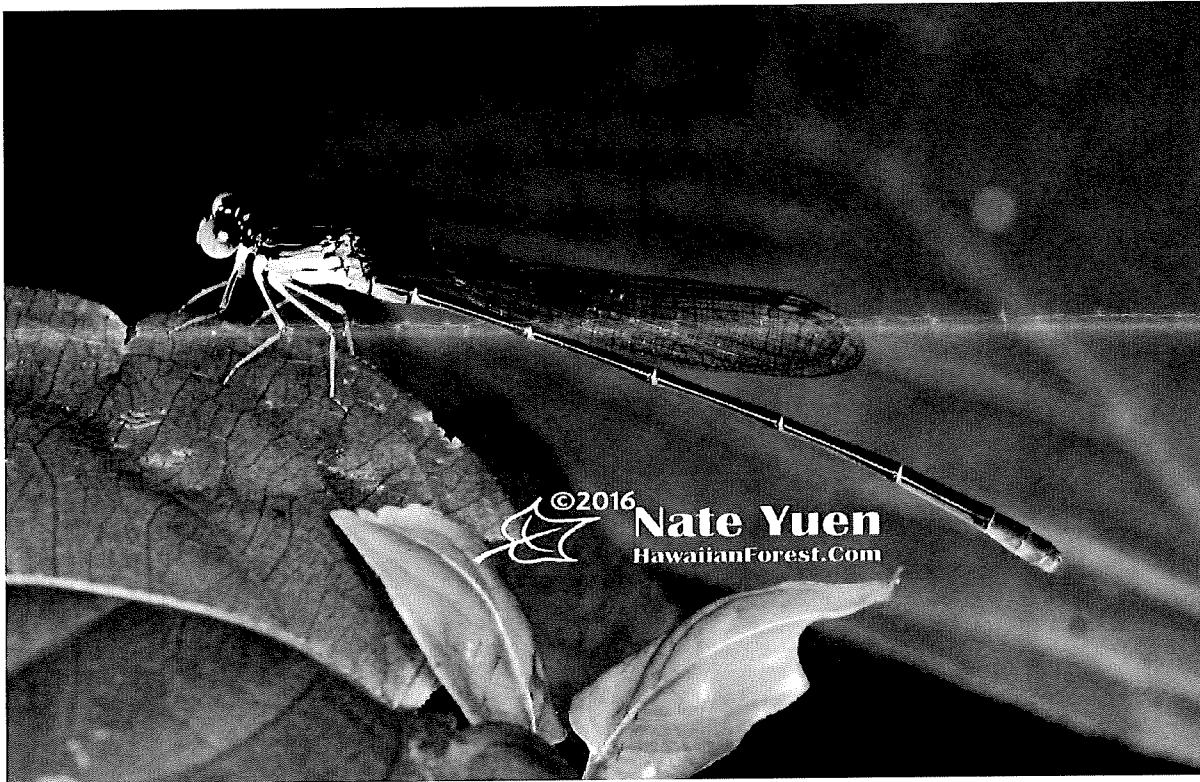
The Pukui/ Elbert Hawaiian dictionary has an intriguing entry for this damselfly — pinapinao ānuenue — the rainbow-eye damselfly.



This is the most common morph for males — it has big round eyes that are red, green, and yellow, a orange-yellow-black thorax, and a segmented abdomen with a red tip.

I have taken many photos of these damselflies at the low elevation site in Kāne'ohe. There are multiple morphs (color patterns) for both male and female damselflies. One of the morphs has a

three colored-eye. The name pinapinao ānueue — the rainbow-eye damselfly — is appropriate for this colorful insect.



This is the most common female morph – the eyes are red on top and blue on the bottom.

I contacted Hawaiian damselfly expert Dan Polhemus at the US Fish & Wildlife Service and brought him to the site. He did the research to get this and several other damselfly species listed as endangered species. Dan Polhemus confirmed that this was a previously unknown population of Blackline Hawaiian Damselflies — *Megalagrion nigrohamatum nigrolineatum*. Dan was also surprised to see these damselflies at this low elevation. He said that this species is endemic only to O'ahu and once inhabited the streams and wetlands throughout the island at all elevations. But they are rare today with less than 1,000 estimated to remain.

Blackline Hawaiian Damselflies are on the federal list of endangered species. Loss of habitat and predation by invasive species are the biggest reasons for their decline. Today they are found at high elevations in the Ko'olau Mountains except for this population in Kāne'ohe. For some reason this population managed to survive at low elevation.

This population of damselflies exists because of a seep – a small fresh water spring – that trickles down a shallow ravine and creates a miniature wetland where they breed. This habitat is crucial to the survival of this remnant population of low-elevation rainbow-eye damselflies. If the habitat is destroyed or otherwise adversely affected, this population of damselflies will likely cease to exist.



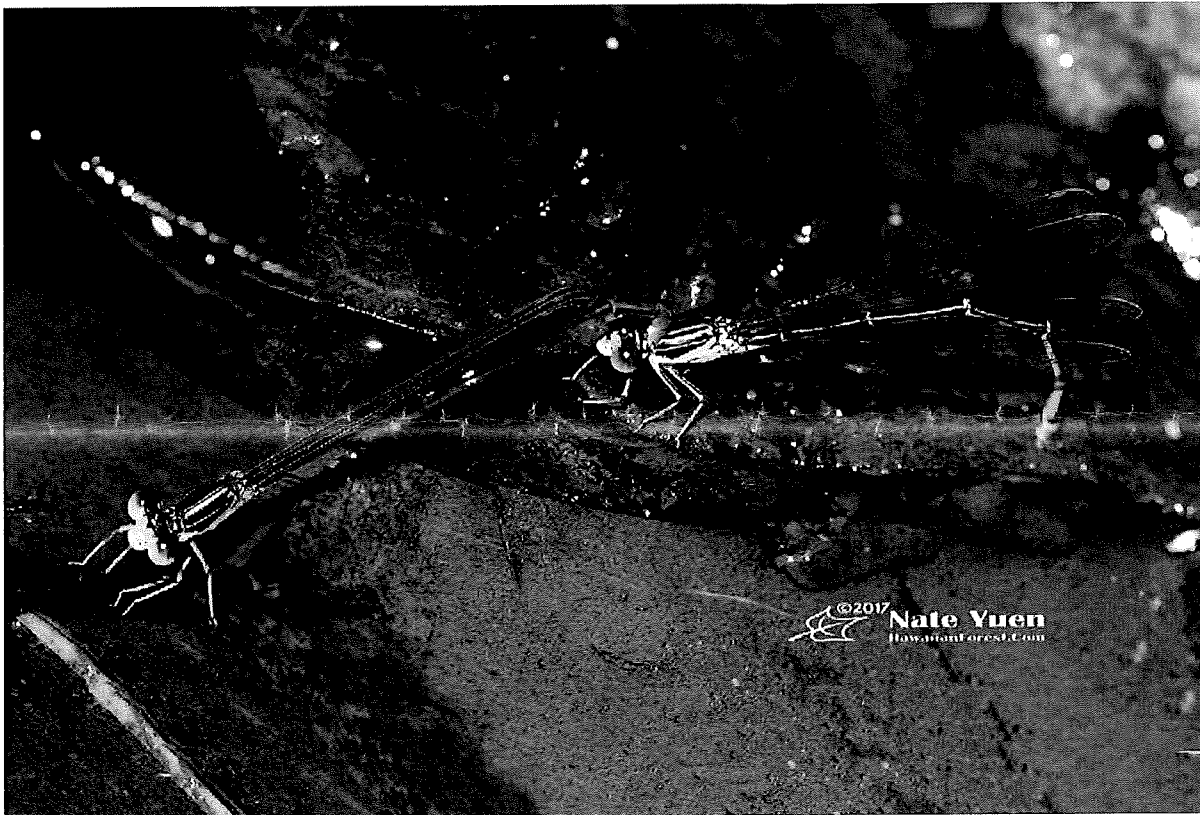
A rival male darts in to interrupt a pair of mating rainbow-eye damselflies.

The proposed cemetery expansion is likely to adversely affect this population of damselflies. It is my understanding that Hawaiian Memorial Park is required to develop a habitat conservation plan to protect these endangered insects. The plan would need to address several issues important to the continuation of this unique population of damselflies.

Of greatest concern is that the proposed cemetery expansion could disrupt the ground water hydrology of the area and cause the seep to stop flowing. The damselfly population cannot survive without water flowing in their habitat.

Another big concern is run-off from the construction or operation of the expanded cemetery could destroy the habitat or introduce fertilizers/pesticides that harm the damselflies. Also studies have shown that the decomposition of human bodies could introduce arsenic and other toxins into the ground water adversely affecting water quality in the seep.

It is also important to establish a sufficient buffer between the expanded cemetery and the damselfly habitat so they continue to exist and breed at the seep without disruption and interference by humans.



After the female is fertilized the pair fly to water where she curls her abdomen and lays eggs in the seep.

The discovery of this previously unknown population of low elevation Blackline Hawaiian Damselflies in Kāneʻohe is a remarkable and significant find. Rainbow damselflies are an endangered species found only on Oʻahu and are unique to the natural history and heritage of Kāneʻohe. The low elevation habitat for these damselflies needs to be protected to ensure their survival into the future.

Thank you for this opportunity to protect these damselflies. I would appreciate being placed on your distribution list so I can participate in this proceeding through the various stages of the process.

Sincerely,

Nathan Yuen

1-19-18

Rich McCreedy
45-423 Ohaha Street
Kaneohe, HI 96744

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
Attention: Ronald A. Sato, Senior Associate

Re: Hawaiian Memorial Park Expansion Project

Mr. Ronald A. Sato

I wish to comment regarding chapter 2.1 of the EISPN that discusses the inventory of the plots being exhausted in the existing 80 acres cemetery. I would like to get more information on the details that support the statement "As of June 2017, HMP has sold over 94% percent of available burial plots, ".

1. In the existing cemetery, how many total plots are there?
2. How many plots have single caskets?
3. How many plots have two or double depth caskets ?
4. How many plots have a combination of caskets and cremated remains in urns?
5. What is the maximum number of cremains the existing cemetery allows per plot?
6. If a family already owns a plot with one or two caskets interred, how many cremains are allowed per plot?

In Chapter 2 Project Objectives, I wish to dispute the statement "Without proper planning for the future, Hawai'i residents could easily face a shortage of cemetery space in the near future." Valley of the Temples cemetery in Kaneohe is a 240 acre cemetery and has many acres of available space.

As a planning and land use policy, the windward side already has enough land devoted to cemeteries. There is Valley of the Temples 240 acres, HMP 80 acres, Greenhaven Memorial Park 6.4 acres, and the State Veterans Cemetery 56 acres. The total acreage for the windward side is 382 acres. If more cemetery space is truly needed, then new developments such as Ho'Opili and Kapolei should include cemeteries in their plans. There are also many acres of suitable former agriculture lands in the center of the island that would be much easier to develop than a steep hillside in Kaneohe.

The residents of our neighborhood on Ohaha St, Ohaha Place, and Lipalu St directly abut the proposed development. We are concerned about negative impacts from this development, and if it were allowed to proceed, how do we know that HMP will continue to be a viable business that will be able to afford to maintain the cemetery and the proposed water run off mitigations. HMP should provide their business plan in the EIS.

Does HMP have enough money in their perpetual care account to maintain the present 80 acre cemetery? Is the proposed expansion necessary to fund their present operations? If this proposed development is allowed to proceed, what happens when they eventually run out of space?

The island of Oahu is already running out of space. We cannot afford to use this valuable hillside for a cemetery for casketed burials in perpetuity. If there is no option to ever use that land more efficiently or for other uses, our society will regret the short sighted choices we make today. We need to adopt more sustainable ways to deal with people at the end of their life.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Rich Mccreedy', with a stylized, cursive script.

Rich Mccreedy

45-423 Ohaha Street
Kaneohe, HI 96744

LAND USE COMMISSION
STATE OF HAWAII

2018 JAN 23 A 8:11

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
Attention: Ronald A. Sato, Senior Associate

Re: Hawaiian Memorial Park Expansion Project

Dear Mr. Soto,

I disagree with some of the findings supporting the preparation of Hawaiian Memorial Park's EIS Preparation Notice.

Finding #2 - The expansion of the cemetery would address a growing need for additional burial space:

Cremation rate in Hawaii is one of the highest in the nation. As our society becomes more environmentally conscious, it is imperative to consider more friendly, green alternatives to internment on an island with limited land use. **What alternatives have you considered to be responsible stewards of our land?**

Finding #5 - Substantially affects public health - expansion should not generate significant public health and water quality issues:

The subject of burial practices is shaky since the impact of degradation products from seepage water (from casket wood, steel, concrete vaults, varnishes, sealers and embalmed bodies full of formaldehyde) in cemeteries has not been studied extensively in the United States. **What research have you found to prove that a cemetery in a watershed region is not detrimental to our neighborhood and will not pose a serious threat to our groundwater and drinking supplies?**

Finding #7 - Involves a substantial degradation of environmental quality:

HMP's best management practices of landscape management in the past provided no written management plan or systemic record-keeping guide to verify their practices in the past. **How can we trust that HMP will assume long term responsibilities for proper maintenance?**

Measurements and observations suggested that a significant source of turbidity and Total Suspended Solids in Kawa Stream came from a construction project underway in HMP in 2002. **If this does occur again, how long will it take to flush deposited soil completely out of Kawa stream's system?**

I believe the last TMDL assessment for Kawa Stream was conducted in 2005. **How can we obtain a more current assessment to use as a baseline and ensure that future pollutants will not be discharged into Kawa Stream?**

Finding #10- Detrimentially affect air quality:

Trees reduce temperatures by 10 degrees in their shade and clean pollution from the air, and help to absorb and store CO2. **How will you revegetate the Petition Area to replace the benefits of the existing forest?**

Finding #11 - Affect or is likely to suffer being located in an environmentally sensitive area:

A significant portion of the Petition Area is characterized with slopes that are 20% or greater. The slopes located above residences on Ohaha and Lipalu Streets in the Pikoi'loa Subdivision are 30- 65%. Kaneohe Silty Clay on the slopes of the southwest end has runoff from medium to rapid, erosion hazard is moderate to severe. A Fema Flood Zone Report places this area in Zone D, an undetermined Risk Area. This is an unstudied area where flood hazards are undetermined! **How do you justify having to grade such severe slopes when a more logical solution would be to leave this precious conservation land alone?**

The widespread occurrence of potential mosquito breeding sites in retention areas may be significant thus, increasing the risk of West Nile and Zika viruses. **How do you plan to offset the possibility of mosquito larvae?**

Looking forward to your responses.

Julianne McCreedy

Sincerely,
Julianne McCreedy