

From: Pat Lee
To: [DBEDT LUC](#); [HI Office of Environmental Quality Control](#)
Cc: rsato@hhf.com
Subject: HMP DEIS comments
Date: Thursday, September 20, 2018 11:49:40 AM
Attachments: [HMP comments 20180920.pdf](#)

Aloha gentlemen,

Please see our attached comment letter in reference to the DEIS for the proposed HMP cemetery expansion, Tax Map Key: (1) 4-5-033: portion of 001.

Mahalo.

Pat & Dianna Lee

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September 20, 2018

Mr. Scott Glenn, Director
Office of Environmental Quality Control
Department of Health
State of Hawaii
235 South Beretania Street, Room 702
Honolulu, Hawai'i 96813

Mr. Daniel E. Orondenker, Executive Director
Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
235 South Beretania Street, Room 406
Honolulu, Hawai'i 96813

Dear Mr. Glenn and Mr. Orondenker,

RE: Draft Environmental Impact Statement (DEIS) for Hawaiian Memorial Park Cemetery Expansion Project Kaneohe, Oahu, Hawaii Tax Map Key: (1) 4-5-033: portion of 001

Thank you for the opportunity to provide our comments on the DEIS for the proposed Hawaiian Memorial Park Cemetery expansion project.

Our home is situated along the banks of Kawa stream, which has a history of flooding and erosion. The stream is owned by the City and County of Honolulu. Our family has lived in this home for over 30 years.

Now that the DFM is no longer using herbicides to clear the stream of vegetation, the stream is only cleaned periodically and often filled with tall weeds and grasses. Flooding is a major concern of the residents in our neighborhood.

The project DEIS notes that:

- (A) Project improvements would increase impervious area due to new roadways and cemetery memorial plaques by about 3.5 acres. Construction of new roadways is estimated to be about 2 acres, and memorial plaques are estimated to encompass about 1.5 acres. The remainder of the cemetery expansion area would be grassed and landscaped.
- (B) Approximately 2 acres of impervious surface would be added to the Petition Area from development of new roadways. After project implementation, the remainder of the Petition Area would consist of cemetery lands, undeveloped land within the Cultural Preserve, and mountainous terrain mauka of the Petition Area. Project implementation results in a 2% total increase in impervious area within the 92.3 acre drainage area. The

results in a 2% total increase in impervious area within the 92.3 acre drainage area. The Cultural Preserve would remain unchanged and would have minimal change to storm water runoff.

- (C) Proposed grading and site improvements are anticipated to reduce the storm water runoff rate, resulting in a corresponding decrease in runoff volume (Sam O. Hirota, Inc., 2018). These improvements would create detention basins and improve water percolation with grassed landscaped lawns that would aid in the reduction of stormwater discharges from the site due to a hurricane.
- (D) Overall, grading improvements would have a beneficial impact on existing drainage conditions by reducing the volume of stormwater runoff and improving the quality of water being discharged. Project improvements proposed would change existing site conditions from undeveloped forest to a predominantly landscaped grass area. Topographic conditions would change to create a more level site with sloped grades of less than 20%. Therefore, runoff rates are expected to decrease because the reduction in slope and the development of landscaped groundcover would increase permeability. Reduction of stormwater runoff rates would result in a corresponding reduction of runoff volumes. Landscaped groundcover will enhance stormwater infiltration and create a vegetated buffer strip serving as a low impact development (LID) improvement. Stormwater would continue to travel in a north-northwesterly direction downslope through the Petition Area for eventual discharge into the City's existing drainage facilities.
- (E) Drainage improvements are also proposed in alignment with City water quality regulations and include construction of retention/detention basins and establishment of vegetative buffers by site landscaping. These improvements would result in a further reduction in stormwater discharge volumes, benefitting drainage conditions and downslope drainage facilities. Given that existing facilities presently appear to lack capacity beyond the 10-year storm event they were designed for, drainage improvements would positively impact these facilities and reduce potential flooding for downstream residences. Based upon this assessment, additional mitigative measures are not needed.

We have the following questions:

1. What are the potential flooding impacts to Kawa stream and adjacent properties downstream during the construction phase and after completion of your project?
2. The DEIS outlines decreased run off volumes, but does this reduce the flow and level of Kawa stream, and what would be the highest level of water in the stream during heavy rains and storms? Wouldn't "additional mitigative measures" further decrease the potential for flooding downstream?
3. The project includes the construction of an approximately 1,000-linear foot long concrete lined catchment ditch for rock fall mitigation. How does this concrete ditch affect stormwater flow into Kawa stream?

4. We have had several recent near misses with Hurricanes Lane and Olivia. The DEIS describes on site stormwater retention areas as part of the design. Will these detention basins be adequate to prevent flooding downstream to residential properties during extraordinary storm events?
5. The stream bank adjacent to our home is earthen and unlined. What effects would the project have on erosion?
6. What assurances do we and other homeowners along the banks of Kawa stream have that the project will not cause future flooding or erosion?

Please note that we are not opposed to the cemetery expansion, however we are very concerned about the potential for unintended consequences occurring due to increased stream flow, flooding and erosion of the banks downstream where we live. Thank you in advance for your response and information.

Sincerely,



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Cc: Mr. Ron Saito
HHF Planners