

October 21, 2018

LAND USE COMMISSION  
STATE OF HAWAII

HFF Planners  
733 Bishop Street, Suite 2590  
Honolulu, HI 96813  
ATTENTION: Mr. Ronald Sato, Senior Planner

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

**HMP is applying for a District Boundary Amendment under the guise that cemeteries are considered green, open space.** But, in actuality, Hawaiian Memorial Park is far from that. There are significant reasons why **cemeteries should not be allowed** in conservation districts.

“We call our cemeteries parks and lawns and fields and greens. **Yet the American Graveyard hardly qualifies as a natural environment.** For all their landscaping aboveground, our cemeteries function less as verdant resting grounds of the dead than as **landfills for the materials** that infuse and encase them.”

“**Little Research has focused on the potential environmental consequences** of depositing such large quantities of hazardous substances into cemetery grounds. Furthermore, **no one is systematically testing cemetery groundwaters for formaldehyde pollution in the United States.** EPA regulates it as a hazardous waste.” (Harris, M., *Grave Matters*, page 38 )

The 1998 World Health Organization (WHO) documented **THE IMPACT OF CEMETERIES ON THE ENVIRONMENT AND PUBLIC HEALTH.** The findings of research from Australia, Brazil, Europe and South Africa note that **most existing cemeteries were sited without thought given to potential risks** to the local environment and community. Please comment on the following questions that **WHO** presented:

**What are safe distances between aquifers in various geological and hydrogeological situations?**

**Have there been any recorded disease outbreaks or epidemics caused by microorganisms seeping from cemeteries?**

**What is the epidemiological evidence for populations living near cemeteries?**

**Why and how do most of the microorganisms produced during the purification process, not appear in the groundwater beneath cemeteries?**

**Have you collected any existing regulations on cemetery siting and design from different countries to substantiate your claim that our neighborhood is a viable location for a cemetery?**

**What should be the desirable minimum thickness of the unsaturated zone beneath cemeteries?**

**Shouldn't new cemeteries or expansions be properly assessed from a geoscientific perspective prior to detailed design planning?**

Dr. Dent, a world renowned hydrologist and engineering geologist, who was referenced in HMP 2008 DEIS, claims that **"Almost nothing is known of decomposition in the tropical environment. Another area lacking in research."** He was referenced again in 2018 DEIS (4-105), The study's initial results indicate **decay products are measurable and could impact the environment.**

HMP states that seals would **limit** seepage and associated decay products into the surrounding environment.

**How long, on an average, will a concrete burial vault last underground?**

**How efficient are casket and burial vault seals near water sources and under harsh environmental conditions?**

**How long do rubber gaskets prevent seepage from exploding caskets due to the accumulated gases and fluids of the decomposing bodies?**

**How do you propose to deal with Differential Settlement of the memorial markers?**  
This already happens so frequently at the Veteran's Cemetery.

**Please clarify** how 30,000 burial plots full of concrete vaults, toxic chemicals from caskets full of varnishes, sealers, preservatives, metal handles /ornaments and embalmed bodies with mercury from dental fillings, pacemakers, esophageal tubes and a host of medical products would be beneficial for our neighborhood and the surrounding environment. (*Disabled World - Cemeteries : Environmental Pollution and Groundwater Contamination, Rev. 2017-05-04*) **At what environmental cost can you justify the deforestation, grading and filling in of a healthy watershed region?**

**I am opposed to the proposed cemetery expansion due to the significant environmental impacts that will result from the deforestation, grading and filling in of valuable conservation land.** Although the acreage for the expansion has decreased, Hawaiian Memorial Park's **siting for their expansion location seems inappropriate and does not reflect a desire to be good stewards** of Hawaii's limited Land. The proposed expansion also **does not portray HMP as a considerate neighbor** who is concerned about potential safety and health risks to our community, Kawa Watershed Region and the receiving coastal waters of Kaneohe Bay.

Sincerely,



Julianne McCreedy  
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