

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

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ACTING DIRECTOR

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DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

October 23, 2018

2018/GEN-26(ry)

Mr. Ronald A. Sato, AICP
Senior Associate
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

LAND USE COMMISSION
STATE OF HAWAII

2018 OCT 25 A 10:29

Dear Mr. Sato:

SUBJECT: Draft Environmental Impact Statement for Hawaiian Memorial
Park Expansion Project
Kaneohe, Oahu, Tax Map Key: 4-5-033: Portion 001

Thank you for the opportunity to comment on your letter received on
September 6, 2018, requesting comments on the subject Draft Environmental Impact
Statement (DEIS).

We have the following comments:

1. DEIS Section 2.4 Listing of Permits and Approvals:
 - a) A drain connection permit is required.
 - b) A dewatering permit may be required.
 - c) The designation of the conservation easement should be processed through the Department of Planning and Permitting (DPP), Subdivision Branch.
 - d) A slope stability analysis should be provided for preliminary grading.
 - e) A slope hazard evaluation in accordance with Section 14-14.2(d)(2) of the Revised Ordinances of Honolulu will be required at the time the grading permit application is submitted to the DPP.

- f) The project is required to comply with the prevailing "Rules Relating to Water Quality" and the "Storm Drainage Standards".

2. Koolau Poko Sustainable Communities Plan (KPSCP):

- a) The proposed cemetery expansion is inconsistent with bullet number 5 under guidelines for cemeteries, page 3-19, of the KPSCP which states:

"Any proposed expansion by Hawaiian Memorial Park must include a 150-foot buffer from residential homes, a 2,000-foot buffer from the Pohai Nani senior living community, and a phased approach to sales and marketing to ensure that the land adjacent to the residential home on Lipalu Street is the last portion of land used for cemetery interment, in order to minimize potential impacts to neighboring residents."

The proposed expansion is only about 1,350 feet away from the Pohai Nani (PN) senior living community when measured from the PN parcel boundary and about 1,700 feet from the PH residential tower. In addition, as the 2,000-foot buffer guideline was established to address concerns of the PN community with respect to the proximity of burials to their residences, the proposed cultural preserve where traditional Hawaiian burials are being sought is only 1,400 feet from the PN tower.

- b) The DEIS did not discuss other cemetery guidelines of the KLSCP relating to how the proposed expansion addresses very low lot coverage ratios, limiting above-grade structures to grave markers of modest size, and the type and size of necessary administrative and maintenance support buildings, which are to be minimally visible from public rights-of-way, entries, and vista points.
- c) A draft copy of the conservation easement for the 156-acre undeveloped portion of Tax Map Key: 4-5-033: Parcel 001 should be included in the Final Environmental Impact Statement.

Mr. Ronald A. Sato, AICP
October 23, 2018
Page 3

Should you have any questions, please contact Raymond Young, of our staff, at 768-8049.

Very truly yours,

A handwritten signature in black ink that reads "Dina L.T. Wong". The signature is written in a cursive, flowing style.

Dina L.T. Wong
Acting Division Chief
Planning Division

DLTW:ah

cc: Land Use Commission

1648797



United States Department of the Interior

U.S. GEOLOGICAL SURVEY
Pacific Islands Water Science Center
1845 Wasp Boulevard, Building 176
Honolulu, Hawaii 96818
Phone: (808) 690-9600/Fax: (808) 690-9599

LAND USE COMMISSION
STATE OF HAWAII

2018 OCT 24 A 9:03

October 22, 2018

Mr. Ronald A. Sato, AICP Senior Associate
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813

Dear Mr. Sato:

Subject: Draft Environmental Impact Statement (DEIS)
Hawaiian Memorial Park Cemetery Expansion Project
Kāne'ohe District, O'ahu, Hawai'i
Tax Map Key No.: (1) 4-5-033: por. 001 (Private Property)

Thank you for forwarding the subject DEIS from HHF Planners to the U.S. Geological Survey Pacific Islands Water Science Center for review and comment. We regret however, that due to prior commitments and lack of available staff, we are unable to review the document.

We appreciate the opportunity to participate in the review process.

Sincerely,

Stephen S. Anthony
Center Director

cc: Mr. Scott Derrickson
State of Hawai'i
Land Use Commission
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawai'i 96804

October 21, 2018

LAND USE COMMISSION
STATE OF HAWAII

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, HI. 96813

2018 OCT 24 A 9:03

Attention: Ronald A. Sato, Senior Associate

In the DEIS, under Proposed Mitigative Measures (4-45), a managed (gated and restricted) access to the Cultural Preserve can continue from Lipalu Street. Although a proposed new pathway through the expanded cemetery can be evaluated and determined by the Koolaupoko Hawaiian Civic Club, this alternative access may potentially be more difficult (slope) and inconvenient route for practitioners to use in the long-term.

- * What hours of the day do you propose access to the heiau on Lipalu Street?
- * What will be the maximum amount of people allowed at any one time?
- * How will access on Lipalu Street be monitored and enforced?
- * Where do you anticipate parking for Cultural Preserve Access on Lipalu Street?

I am against the Hawaiian Memorial Park Expansion.

Dudley Dias



45-469 Lipalu Street
Kaneohe, HI. 96744

DAVID Y. IGE
GOVERNOR

LAND USE COMMISSION
STATE OF HAWAII

2018 OCT 25 P 3:00



STATE OF HAWAII
DEPARTMENT OF TRANSPORTATION
869 PUNCHBOWL STREET
HONOLULU, HAWAII 96813-5097

JADE T. BUTAY
DIRECTOR


Deputy Directors
ROY CATALANI
ROSS M. HIGASHI
EDWIN H. SNIFFEN
DARRELL T. YOUNG

IN REPLY REFER TO:
DIR 1029
STP 8.2544

October 23, 2018

TO: THE HONORABLE LUIS P. SALAVERIA, DIRECTOR
DEPARTMENT OF BUSINESS AND ECONOMIC DEVELOPMENT
AND TOURISM

ATTN: SCOTT DERRICKSON
LAND USE COMMISSION

FROM: JADE T. BUTAY
DIRECTOR OF TRANSPORTATION 

SUBJECT: HAWAIIAN MEMORIAL PARK (HMP) CEMETERY EXPANSION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT
KANEOHE, OAHU, HAWAII
TMK: (1) 4-5-033:001 (POR.)

The applicant, Hawaiian Memorial Life Plan, Ltd., which owns and manages HMP, proposes an expansion to ensure that a sufficient supply of burial plots can be maintained. The applicant proposes reclassification of a 53.45 acres portion of Parcel 001 (164.4 acres) from Conservation District to Urban District. The reclassified area will consist of 28.2 acres for cemetery use, 14.5 acres for cultural preserve and the remainder for open space and internal roadways. The Department of Transportation (DOT) offer the following comments:

Highways Division

Kamehameha Highway in the project vicinity is a four-lane facility and HMP has two stop-controlled driveways across from Mahinui Road and from Halekou Road. The Traffic Impact Analysis Report (TIAR) noted that DOT was evaluating the Halekou Road intersection for possible signalization but, no decision had been made. The TIAR included two alternatives: one with a traffic signal, and one without a traffic signal.

1. Based on the TIAR, the proposed expansion is not anticipated to have a significant impact to our State highways; therefore, HMP has no transportation improvements to the State Highway System. HMP should implement the TIAR recommendation for restriping the HMP approaches to Kamehameha Highway to provide for better exiting traffic flow.
2. HMP should provide for appropriate traffic control plans in the event some activity within HMP and/or areas contained within its boundaries may cause traffic issues at access driveways.

The Honorable Luis P. Salaveria
October 23, 2018
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STP 8.2544

3. If there should be unexpected traffic issues not provided for in the TIAR that can be attributed to HMP, the traffic issues should be mitigated to the satisfaction of the DOT.

If there are any questions, please contact Mr. Blayne Nikaido of the DOT Statewide Transportation Planning Office at telephone number (808) 831-7979 or by email at blayne.h.nikaido@hawaii.gov.

c: Ronald A. Sato, HHF Planners

DAVID Y. IGE
GOVERNOR OF
HAWAII



RECEIVED

OCT 25 2018

OFFICE OF PLANNING

LAND USE COMMISSION
STATE OF HAWAII

2018 OCT 25 A 8:54

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES

OFFICE OF CONSERVATION AND COASTAL LANDS
POST OFFICE BOX 621
HONOLULU, HAWAII 96809

SUZANNE D. CASE
CHAIRPERSON
BOARD OF LAND AND NATURAL RESOURCES
COMMISSION ON WATER RESOURCE MANAGEMENT

ROBERT K. MASUDA
FIRST DEPUTY

JEFFREY T. PEARSON, P.E.
DEPUTY DIRECTOR - WATER

AQUATIC RESOURCES
BOATING AND OCEAN RECREATION
BUREAU OF CONVEYANCES
COMMISSION ON WATER RESOURCE MANAGEMENT
CONSERVATION AND COASTAL LANDS
CONSERVATION AND RESOURCES ENFORCEMENT
ENGINEERING
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
KAHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:TM

Correspondence: 19-43

Ronald A. Sato, AICP
HHF Planners
733 Bishop St., Suite 2590
Honolulu, HI 96813

OCT 23 2018

SUBJECT: Draft Environmental Impact Statement for the Hawaiian Memorial Park Cemetery Expansion Project Located at Kane'ohē, O'ahu, TMK: (1) 4-5-033:001

Dear Mr. Sato:

The Office of Conservation and Coastal Lands has reviewed the voluminous subject document. According to the information provided, the Hawaiian Memorial Park (HMP) desires to reclassify 53.45-acres of land that lie within the Conservation District State Land Use District into the Urban State Land Use District. Should the property be reclassified, it is proposed that approximately 28.2-acres will be utilized to create cemetery space; approximately 14.5-acres will be designated as a Cultural Preserve and about 3-acres will be used as roadways. The rest of the property (approx. 148-acres) will remain undeveloped and under a conservation easement restricting future development. The conservation easement would also oversee the Cultural Preserve area and ensure the long-term stewardship of the area as well.

The OCCL notes this latest proposal moves the preserve area further mauka and the expansion west has increased grading of the undeveloped area. The total graded area of 33.82-acres with an estimated excavation of 470,960 cubic yards will level the area to establish a 2 to 1 slope and the majority of the land would be landscaped with turf to match the appearance of the existing cemetery. As stated in the document: "These grading activities would alter existing topographic conditions, particularly on the western half of the petition area. The western hillside and lower basin knoll would be removed."

The OCCL appreciates the protection and preservation of the undeveloped area and Cultural Preserve area. Regarding the Cultural Preserve area, it is understood that a Preservation Plan will be developed to provide guidance for cultural activities and undertakings, access and management responsibilities. In discussion with individuals with knowledge of traditional practices, due to the proximity of the Po'o Kanaka Luakini Heiau, we understand that proper protocols and a buffer or designated area for traditional Hawaiian burials shall be observed to insure the Heiau will not be disturbed.