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October 19, 2018

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

Dear Mr. Sato:

Subject: Draft Environmental Impact Statement
Hawaiian Memorial Park Cemetery Expansion
Kaneohe, Hawaii
Tax Map Key: (1) 4-5-033: 001 (por.)

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the planned expansion of Hawaiian Memorial Park Cemetery located in Kaneohe, Oahu. The DEIS and its review material was sent to our office by letter dated September 8, 2018.

Hawaiian Memorial Life Plan, Limited, is seeking to reclassify 53.45 acres of land from the State Land Use Conservation District (Limited Subzone) to the State Land Use Urban District in order to expand the Hawaiian Memorial Park Cemetery. The overall objective of this cemetery expansion project is to provide ground interment and inurnments spaces, as well as provide 14.5 acres to serve as a cultural preserve.

The DEIS serves to support the applicant's petition to the State Land Use Commission. The DEIS states that the remaining portions of the larger 164.4-acre property surrounding the petition area would remain undeveloped. A conservation easement with the Hawaiian Islands Land Trust would be placed on 156.5 acres of the larger parcel restricting future development of the property except for execution of the proposed action.

The Office of Planning (OP) has reviewed the DEIS and has the following comments to offer:

1. Previous Comments

Our Environmental Impact Statement Preparation Notice (EISPN) response letter dated January 17, 2018 (DTS 201801170934BE), requested the DEIS:

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- a. Analyze the project's consistency with all of the Hawaii State Planning Act, Hawaii Revised Statutes (HRS) Chapter 226;
- b. Provide an examination of HRS § 205A-2, the objectives and policies of the Hawaii Coastal Zone Management (CZM) Program; and
- c. Provide an analysis on stormwater control methods, drainage, and mitigation strategies to safeguard the nearby water resources and the coastal/marine ecosystems.
- d. Other studies would be included within the DEIS, such as cemetery capacity, traffic impacts, impacts to surface and ground water, feasibility of using non-potable water for irrigation, wastewater issues, archaeological and cultural impacts, alternatives for the project, soils and topography, rockfall studies, botanical, invertebrate and faunal studies, cultural impacts, including Kapaakai analysis, county requirements and regulatory constraints.

OP acknowledges that the comments and concerns cited above from our EISPN comment letter have been sufficiently addressed in the DEIS.

However, we note that the DEIS does not include comments from the State Historic Preservation Division (SHPD). Pursuant to HRS § 205-17 Land Use Commission decision-making criteria, areas of State concern required to be addressed include section 3. (B) Maintenance of valued cultural, historical, or natural resources. Thus, we suggest that prior to proceeding with processing of the Petition to reclassify the Petition Area from the State Conservation to the Urban Land Use District, that the Petitioner submit Appendix J Archaeological Inventory Survey for Hawaiian Memorial Park, Kaneohe Ahupuaa, Koolaulupoko District, Island of Oahu, and Appendix K Draft Cultural Impact Assessment Report for Hawaiian Memorial Park Expansion Area, Kaneohe Ahupuaa, Koolaulupoko District, Oahu Island to SHPD for a Chapter 6E review to obtain their review and comments.

If you should have any questions, please contact Lorene Maki of our Land Use Division at (808) 587-2888.

Sincerely,



Leo R. Asuncion
Director

cc: Scott Derrickson, Land Use Commission ✓