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LAND USE COMMISSION
STATE OF HAWAII

2019 APR 11 A 11:27

DTS: 201903151430MA

April 11, 2019

To: Daniel Orodener, Executive Officer
State Land Use Commission

From: Rodney Funakoshi, Planning Program Administrator

Subject: Docket No.: A17-804 Hawaiian Memorial Park Cemetery
Expansion Draft Final Environmental Impact Statement
Kaneohe, Hawaii

Land Area: Petition Area 53.45 Acres;

Request: Conservation to Urban

TMK: (1) 4-5-033: 001 (por.)

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 additional ground interment and inurnment spaces, as well as provide a 14.5 acre Cultural Preserve northwest of the cemetery expansion area. This 53.45 acre Petition Area is a portion of a larger 164.4 acre property, which would remain undeveloped. A conservation easement with the Hawaiian Islands Land Trust would be placed on 156.5 acres of this undeveloped area, restricting future development of the property.

The Office of Planning (OP) has reviewed the Draft Final Environmental Impact Statement (Draft FEIS) for the subject project and has the following comments.

In OP's letter of October 19, 2018, we indicated that our previous comments on the Environmental Impact Statement Preparation Notice (EISPN) response letter dated January 17, 2018 have been sufficiently addressed in the DEIS. We also indicated that studies 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, including Ka Paakai analysis, alternatives for the project, soils and topography, rockfall studies, botanical, invertebrate and faunal studies, county requirements and regulatory constraints should be included. These studies have been included within the body of the Final EIS and expanded in the relevant appendices.

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Chapter 4 Human Environment. 4.1.3.2 Evaluation of Impacts to Sites. Proposed Action. Page 4-32. In our October 19, 2018 letter we also indicate that comments from the State Historic Preservation Division should be included. Pursuant to HRS Section 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. The Final EIS indicates that SHPD has completed their review and a comment letter and response is included in Appendix A-4.

Based on the above, we recommend that the LUC **accept** the Draft FEIS for the Petition.

We appreciate the opportunity to provide our comments on the Draft FEIS. If you have any questions, please contact Ms. Lorene Maki of our Land Use Division.

Cc: Matsubara, Kotake & Tabata. Benjamin M. Matsubara, Curtis T. Tabata
Department of Planning and Permitting