

APPENDICES



HHF PLANNERS
places for people

APPENDIX **A-1**

*Environmental Impact Statement Preparation Notice
Comments and Responses*





United States Department of the Interior



FISH AND WILDLIFE SERVICE
Pacific Islands Fish and Wildlife Office
300 Ala Moana Boulevard, Room 3-122
Honolulu, Hawai'i 96850

In Reply Refer To:
01EPIF00-2018-TA-0116

FEB 05 2018

Mr. Ronald A. Sato, AICP, Senior Associate
HFF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96819

Subject: Technical Assistance for the Environmental Impact Statement Preparation Notice
for the proposed Hawaiian Memorial Park Cemetery Expansion Project,
Kāne'ohe, O'ahu

Dear Mr. Sato:

#1 The U.S. Fish and Wildlife Service (Service) received your letter on December 27, 2017, requesting our comments on the proposed Hawaiian Memorial Park Cemetery Expansion Project, located in Kāne'ohe, on the island of O'ahu [TMK: (1) 4-5-033: por. 001]. Hawaiian Memorial Life Plan, Ltd. (Petitioner) owns and manages the Hawaiian Memorial Park (HMP) that offers a variety of interment options. HMP is a full-service cemetery located in Kāne'ohe, O'ahu, Hawai'i, and has been at its present location since 1958. The Petitioner is proposing the expansion of HMP because of a growing aging population on O'ahu and demand for ground interment and inurnment spaces. Currently, only about 6% of all the individual plots at HMP remain available for families. The proposed improvements (Proposed Action) within the approximately 53.45-acre Petition Area would consist of two main components: 1) expansion of the HMP cemetery; and 2) creation of a 14.5-acre cultural preserve immediately to the northeast of the cemetery expansion area. Remaining undeveloped areas of Parcel 1 outside of the Petition Area would continue to remain undeveloped.

The majority of the approximately 53.45-acre Petition Area would be used for expansion of the cemetery by 28.2 acres (53% of total Petition Area). The cemetery expansion would involve the construction of landscaped areas for burial space. Small private structures could also be placed throughout the cemetery grounds with special features, garden walls, walkways, and monuments similar to that present within other areas of HMP. After grading to establish appropriate slopes, the majority of the land would be landscaped with turf and would match the appearance of the existing cemetery.

An internal roadway system encompassing about 3 acres would be constructed to provide access to various areas. The roadway would be paved and suitable to accommodate two-way traffic.

An irrigation system would be provided to irrigate the landscape elements of the cemetery. The irrigation system for the existing HMP is served by the City's potable water system. A connection point is located at the entrance to HMP in the vicinity of Mahinui Road and Kamehameha Highway. A waterline under Kumakua Place irrigates the existing Ocean View Garden site. The feasibility of incorporating a non-potable water source for the cemetery expansion area would be evaluated. However, if a non-potable water source cannot be obtained, the cemetery would be allowed to hook up to the domestic water supply.

Storm water runoff would be managed in accordance with applicable City regulations and drainage standards. The primary method planned to manage the cemetery's stormwater would be a system of retention areas designed to meet City's Drainage Standards for the 100-year, 1-hour storm event. More detailed information associated with grading and drainage improvements would be discussed in your Draft EIS.

A 14.5-acre area within the Petition Area would be established as a cultural preserve. This cultural preserve would allow for the preservation and maintenance of cultural sites present within this area. This area contains a range of significant resources within its boundaries, including, but not limited to Kawa'ewa'e Heiau, other historic sites, native plants used for cultural practices, and is the site of wahi pana (storied places or landscapes).

A preservation plan is currently being developed by Hawaiian Memorial Life Plan, Ltd. in partnership with the Ko'olaupoko Hawaiian Civic Club regarding the stewardship and management of the cultural preserve. The preservation plan would determine the best treatment strategies for the resources within the cultural preserve, the reserve's management, and its operation. The preservation plan would ensure the long-term maintenance and security of Kawa'ewa'e Heiau and this area.

The 156.5 acres of the 164.4 acre parcel (less 7.9-acre Ocean View Garden) will be placed in a conservation easement. This conservation easement would limit any other future development on the property, except for the expansion of the cemetery and cultural preserve. Further details on the conservation easement would be discussed in your Draft EIS.

HMP intends to commence design and construction of the backbone infrastructure for development of the entire Petition Area in a single integrated system as soon as all entitlements have been obtained. Construction would likely occur in phases in successive 5-acre increments until all sections of the cemetery expansion area have been completed. It is anticipated that the entitlement phase of the project would be completed in early to mid-2019. A preliminary target date for completion of the initial phase of construction is 2020.

#2 We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawai'i Biodiversity and Mapping Program as it pertains to listed species and designated critical habitat in accordance with section 7 of the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*). Our data indicate the federally endangered blackline Hawaiian damselfly (*Megalagrion nigrohamatum nigrolineatum*) and the Hawaiian hoary bat (*Lasiurus cinereus semotus*) may occur within the vicinity of your proposed project. We offer the following comments to assist you in your proposed project.

#3 Blackline Hawaiian damselfly

Blackline Hawaiian damselfly adults are predacious and feed on small flying insects, such as midges; immatures require pools in upland streams, as well as seepage-fed pools that border them, and some degree of riparian tree cover. Threats to the current existence of this species include severe alteration and degradation of freshwater habitats due to past and present land use and water management practices, including agriculture, urban development, and development of ground water, perched aquifer and surface water resources, as well as accidental and deliberate introduction of alien species, such as fish, backswimmers, California grass and fire ants.

The habitat where the blackline Hawaiian damselflies are found within your proposed project area consists of a spring head contained in a damaged concrete box structure, with an interior water-filled well approximately 9 feet deep. Water seeping out of the hillside to either side of this structure accumulates as shallow pools 1-3 inches deep in a small, muddy gully that gently descends for a distance of approximately 250 linear feet until being captured in a vertical concrete shaft that connects to the City and County of Honolulu storm sewer system. The blackline Hawaiian damselflies appear to be breeding along the length of this outflow between the spring head and the storm sewer intake. We recommend you work with our office to develop avoidance and minimization measures in order to allow the continued persistence of this population.

Your EISPN proposes an updated survey of native invertebrate resources would be conducted, and project effects addressed in the Draft EIS. This would include an expanded field inspection to determine the full extent of the presence of the endangered blackline Hawaiian damselfly. Necessary best management practices would be addressed to ensure the project does not impact damselfly habitat. We appreciate further coordination regarding management practices to address avoidance and minimization measures as part of your proposed project.

#4 Hawaiian hoary bat

The Hawaiian hoary bat roosts in both exotic and native woody vegetation across all islands and will leave young unattended in trees and shrubs when they forage. If trees or shrubs 15 feet or taller are cleared during the pupping season, there is a risk that young bats could inadvertently be harmed or killed since they are too young to fly or may not move away. Additionally, Hawaiian hoary bats forage for insects from as low as three feet to higher than 500 feet above the ground and can become entangled in barbed wire used for fencing.

To avoid and minimize impacts to the endangered Hawaiian hoary bat we recommend you consider incorporating the following applicable measures into your project description:

- Do not disturb, remove, or trim woody plants greater than 15 feet tall during the bat birthing and pup rearing season (June 1 through September 15).
- Do not use barbed wire for fencing.

We appreciate your efforts to conserve Hawai'i's native species. If you have any questions or concerns regarding our letter, please contact Jiny Kim, Fish and Wildlife Biologist (email: Jiny_Kim@fws.gov) and Dr. Dan A. Polhemus, Aquatic Ecosystem Conservation Program

Manager (email: Dan_Polhemus@fws.gov). When referring to this project, please include this reference number: 01EPIF00-2018-TA-0116.

Sincerely,

A handwritten signature in blue ink, appearing to read 'A. Nadig', with a stylized flourish at the end.

Aaron Nadig
Island Team Manager
O'ahu, Kaua'i, Northwestern Hawaiian
Islands and American Samoa

August 22, 2018



Mr. Aaron Nadig, Island Team Manager
U.S. Department of the Interior
Fish and Wildlife Service
Pacific Islands Fish and Wildlife
300 Ala Moana Blvd., Room 3-122
Honolulu, HI 96850

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Nadig:

Thank you for the February 5, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under subheadings corresponding to your general comments and specific resource comments.

1. General Project Description

The general project description discussed is consistent with the EISPN and the Draft Environmental Impact Statement (DEIS). A small portion of the cultural preserve would be utilized for new burials of deceased native Hawaiians following traditional native Hawaiian protocols.

2. FWS Database Research

We acknowledge your review of Hawaiʻi Biodiversity and Mapping Program data resulting in your assessment that federally endangered Blackline Hawaiian damselfly (*Megalagrion nigrohamatum nigrolineatum*) and Hawaiian hoary bat (*Lasiurus cinereus semotus*) may occur in the vicinity of the Petition Area.

3. Blackline Hawaiian Damselfly

We appreciate the information on the Blackline Hawaiian damselfly characteristics and threats to its existence.

We acknowledge that the shallow seep emanating from an existing shallow well structure serves as a habitat for Blackline Hawaiian damselfly. The DEIS will include more information on this habitat. We have been in contact with your office to discuss this species, which included a meeting with a representative from your Partners for Fish and Wildlife Program. Based upon this meeting, this site would be avoided and a habitat restoration and conservation program would be established in cooperation with your

Mr. Aaron Nadig
U.S. FWS

Page 2

Partner's Program, supporting the protection of this endangered species and providing educational opportunities.

An updated invertebrate survey was conducted and assessed project impacts to invertebrate species present within the Petition Area. This survey included a field inspection to determine the extent of the damselfly's presence. The updated survey proposes mitigation measures to avoid impacts to damselfly habitat, and the DEIS discusses best management practices for construction activities. The updated survey will be included in the DEIS. We will continue coordination with your agency through the project's environmental review to ensure appropriate avoidance and minimization measures are identified.

4. Hawaiian Hoary Bat

An updated avifauna and faunal survey has been conducted for the DEIS. This survey identifies avifauna and faunal species present within the Petition Area, assesses the project impact on these species, and identifies mitigation measures that may be needed. The presence of Hawaiian hoary bat within the Petition Area is assessed in this survey, and we acknowledge the risk young bats face with taller trees cleared along with potential entanglement in barbed wire used for fencing. Fencing proposed around the Petition Area would avoid the use of barbed wire. The survey report is included in the DEIS and the measures identified to minimize impacts to Hawaiian hoary bat have been incorporated.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR



RODERICK K. BECKER
Comptroller

AUDREY HIDANO
Deputy Comptroller

STATE OF HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

DEC 29 2017

(P)1399.7

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

Dear Mr. Sato:

Subject: Environmental Impact Statement Preparation Notice for
Hawaiian Memorial Park Cemetery Expansion Project
Kaneohe, Oahu
TMK: (1) 4-5-033: por. 001(Private Property)

Thank you for the opportunity to comment on the subject project. The proposed project does not impact any of the Department of Accounting and General Services' projects or existing facilities and we have no comments to offer at this time.

If you have any questions, your staff may please contact Ms. Dora Choy of the Planning Branch at 586-0488.

Sincerely,

A handwritten signature in blue ink, appearing to read "Keith S. Kogachi".

KEITH S. KOGACHI
Acting Public Works Administrator

DC:lnn

c: Mr. Scott Derrickson, DBEDT-LUC
Mr. Cory Shibata, DAGS-CSD



August 22, 2018

Mr. Keith S. Kogachi, Acting Public Works Administrator
Department of Accounting and General Services
State of Hawai'i
P.O. Box 119
Honolulu, Hawai'i 96810

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāne'ohe, O'ahu, Hawai'i

Dear Mr. Kogachi:

Thank you for the December 29, 2017 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

We confirm that the proposed project does not impact any Department of Accounting and General Services' (DAGS) projects or existing facilities, and your agency has no other comments to offer at this time.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

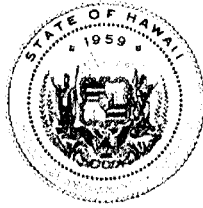
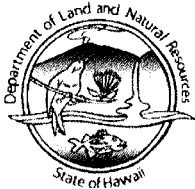
Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR OF
HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
DIVISION OF AQUATIC RESOURCES
1151 PUNCHBOWL STREET, ROOM 330
HONOLULU, HAWAII 96813

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
KAIHOLOAWI ISLAND RESERVE COMMISSION
LAND
STATE PARKS

Date: Jan.19, 2018
DAR # 5663

MEMORANDUM

TO: Bruce S. Anderson, PhD
DAR Administrator

FROM: Glenn Higashi *GH*, Aquatic Biologist

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) on the Hawaiian Memorial Park Expansion Project

Request Submitted by: HHF Planners on behalf of Hawaiian Memorial Life Plan, Ltd.

Location of Project: (1) 44-5-033: por. 001 (private property), Kaneohe District, Oahu, Hawaii

Brief Description of Project:

Hawaiian Memorial Life Plan, Ltd. owns Hawaiian Memorial Park (HMP), which operates as a cemetery providing the community with burial plots along with a variety of interment options. HMP is a full service cemetery that has been at its present location since 1958. HMP is the final resting place for over 41,000 people, representing families across Hawai'i. As sections of the cemetery have filled, HMP has grown from an initial size of six acres to its existing size of approximately 80 acres situated on three tax map parcels. One of the parcels is separated by the Hawai'i State Veterans Cemetery. (continued on the next page)

Comments:

No Comments Comments Attached

Thank you for providing DAR the opportunity to review and comment on the proposed project. Should there be any changes to the project plan, DAR requests the opportunity to review and comment on those changes.

Comments Approved: *Bruce S. Anderson* Date: 1/22/18
Bruce S. Anderson, PhD
DAR Administrator

DAR# 5663

Brief Description of Project

The Hawaiian Memorial Park Expansion Project involves proposed improvements (Proposed Action) within the approximately 53.45-acre Petition Area would consist of two main components: 1) expansion of the HMP cemetery; and 2) creation of a 14.5-acre cultural preserve immediately to the northeast of the cemetery expansion area. Remaining undeveloped areas of Parcel 1 outside of the Petition Area would continue to remain undeveloped.

The Petition Area for the expansion of the cemetery is situated makai (seaward) of the existing HMP area and the Hawai'i State Veterans Cemetery. The Petition Area is about 53.45 acres in size, and is a portion of a larger 164.4-acre parcel identified as Tax Map Key (1) 4-5-033: 001 (Parcel 1). Parcel 1 is owned by Hawaiian Memorial Life Plan Ltd. (Petitioner) and about 7.9 acres of Parcel 1 consists of the existing Ocean View Garden cemetery, which is part of HMP. Of the 53.45-acre Petition Area, only 28.2 acres would be for cemetery use. The remaining 25.25 acres of the site would consist of internal roadways, open space, and land for the establishment of a cultural preserve. The entire HMP property is comprised of three separate parcels.

HMP is a privately-owned cemetery located in the Kāneʻohe district on the Windward side of the island of Oʻahu. The cemetery is approximately 7 miles northeast of downtown Honolulu, and located mid-way between the towns of Kailua to the east and Kāneʻohe to the west. The Petition Area is situated within the ahupuaʻa (traditional land division) of Kāneʻohe. Kāneʻohe is a large ahupuaʻa of approximately 11,000 acres, extending from the Windward crest of the Koʻolau Mountain Range to include most of the Mōkapu Peninsula, and is bordered by the ahupuaʻa of Heʻeia to the west and Kailua to the east.

The Koʻolau Mountain Range is located west of the HMP site, and Kāneʻohe Bay is situated approximately 1.5 miles to the north. Figure 1.1 is a location map showing the Petition Area in relation to the larger Windward district.

DAR# 5663

Comments

The proposed project is not expected to have adverse impacts on the aquatic environment.



RECEIVED

DEC 26 2017

December 19, 2017

Division of Aquatic Resources

DAR 5663

Dear Participant:

Enclosed is an Environmental Impact Statement Preparation Notice (EISPN) providing public notice that a Draft Environmental Impact Statement (Draft EIS) is being prepared for the subject project. The EIS will be prepared in accordance with State of Hawai'i EIS law (Chapter 343, Hawaii Revised Statutes) and EIS rules (Title 11, Chapter 200, Hawai'i Administrative Rules). This EISPN is intended to solicit public input regarding the scope of the forthcoming Draft EIS.

TITLE OF PROJECT: Hawaiian Memorial Park Cemetery Expansion Project
LOCATION: Kāne'ohe District, O'ahu, Hawai'i
TAX MAP KEY NO.: (1) 4-5-033: por. 001 (Private Property)
APPLICANT: Hawaiian Memorial Life Plan, Ltd.
ADDRESS: 1330 Maunakea Street
Honolulu, Hawaii 96813
CONTACT: Mr. Jay Morford, President
PHONE: (808) 522-5233

YOUR COMMENTS MUST BE RECEIVED OR POSTMARKED BY MONDAY, JANUARY 22, 2018. COMMENTS SHOULD BE SENT TO THE FOLLOWING:

CONSULTANT: HHF Planners
ADDRESS: 733 Bishop Street, Suite 2590
Honolulu, Hawai'i 96813
CONTACT: Ronald A. Sato, AICP, Senior Associate
Email: rsato@hhf.com
PHONE: (808) 457-3172

WITH A COPY SENT TO:

APPROVING AGENCY: State of Hawai'i
Land Use Commission
Department of Business, Economic Development & Tourism
ADDRESS: P.O. Box 2359
Honolulu, Hawaii 96804
CONTACT: Mr. Scott Derrickson
Email: scott.a.derrickson@hawaii.gov
PHONE: (808) 587-3921

Thank you for your participation in the EIS process. We look forward to receiving your comments.



August 22, 2018

Mr. Bruce S. Anderson, DAR Administrator
Division of Aquatic Resources
Department of Land and Natural Resources
State of Hawai'i
1151 Punchbowl Street, Room 330
Honolulu, Hawai'i 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe District, Oʻahu, Hawai'i

Dear Mr. Anderson:

Thank you for the January 19, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

The general project description discussed is consistent with the EISPN and the soon to be published Draft Environmental Impact Statement (DEIS).

We acknowledge your assessment that the proposed project is not expected to have adverse impacts on the aquatic environment.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR OF HAWAII



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

STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

January 19, 2018

HHF Planners

Attention: Mr. Ronald A. Sato, AICP, Senior Associate
733 Bishop Street, Suite 2590
Honolulu, HI 96813

via email: rsato@hhf.com

Dear Mr. Sato:

**SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for
Hawaiian Memorial Park Cemetery Expansion Project**

Thank you for the opportunity to review and comment on the subject matter. The Department of Land and Natural Resources' (DLNR) Land Division distributed or made available a copy of your report pertaining to the subject matter to DLNR Divisions for their review and comments.

At this time, enclosed are comments from the (a) Land Division – Oahu District and (b) Engineering Division on the subject matter. Should you have any questions, please feel free to call Lydia Morikawa at 587-0410. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji
Land Administrator

Enclosure(s)

cc: S. Derrickson, DBEDT; via email: scott.a.derrickson@hawaii.gov
Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 28, 2017

MEMORANDUM

RECEIVED
LAND DIVISION
JAN 9 AM 7:11

TO:

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Environmental Impact Statement Preparation Notice (EISPN) for **Hawaiian Memorial Park Cemetery Expansion Project**

LOCATION:

District of Koolaupoko, Island of Oahu; TMK No. (1) 4-5-033:001 (por.)

APPLICANT:

Hawaiian Memorial Life Plan, Ltd.

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **January 19, 2018**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice in the middle of the page.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Darleen Bryant-Takamatsu

Print Name:

Darleen Bryant-Takamatsu

Date:

1/8/18

Attachments

cc: Central Files



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
LAND DIVISION

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

December 28, 2017

MEMORANDUM

17 DEC 29 AM 10:36 ENGINEERING
REC CLMEL
LAND DIVISION
2018 JAN 19 AM 11:00

~~TO:~~

DLNR Agencies:

- Div. of Aquatic Resources
- Div. of Boating & Ocean Recreation
- Engineering Division**
- Div. of Forestry & Wildlife
- Div. of State Parks
- Commission on Water Resource Management
- Office of Conservation & Coastal Lands
- Land Division – Oahu District
- Historic Preservation

FROM

~~FROM:~~

SUBJECT:

Russell Y. Tsuji, Land Administrator
Environmental Impact Statement Preparation Notice (EISPN) for **Hawaiian Memorial Park Cemetery Expansion Project**

LOCATION:

District of Koolaupoko, Island of Oahu; TMK No. (1) 4-5-033:001 (por.)

APPLICANT:

Hawaiian Memorial Life Plan, Ltd.

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **January 19, 2018**.

The DEA can be found on-line at: <http://health.hawaii.gov/oeqc/> (Click on the Current Environmental Notice in the middle of the page.)

If no response is received by this date, we will assume your agency has no comments. If you have any questions about this request, please contact Lydia Morikawa at 587-0410. Thank you.

- We have no objections.
- We have no comments.
- Comments are attached.

Signed:

Print Name:

Cary S. Chang, Chief Engineer

Date:

1/19/18

Attachments

cc: Central Files

**DEPARTMENT OF LAND AND NATURAL RESOURCES
ENGINEERING DIVISION**

LD/Russell Y. Tsuji

Ref: Environmental Impact Statement Preparation Notice (EISPN) for Hawaiian Memorial Park Cemetery Expansion Project, District of Koolaupoko, Island of Oahu; TMK No. (1) 4-5-033:001 (por.)

COMMENTS

The rules and regulations of the National Flood Insurance Program (NFIP), Title 44 of the Code of Federal Regulations (44CFR), are in effect when development falls within a Special Flood Hazard Area (high risk areas). Be advised that 44CFR reflects the minimum standards as set forth by the NFIP. Local community flood ordinances may stipulate higher standards that can be more restrictive and would take precedence over the minimum NFIP standards.

The owner of the project property and/or their representative is responsible to research the Flood Hazard Zone designation for the project. Flood Hazard Zones are designated on FEMA's Flood Insurance Rate Maps (FIRM), which can be viewed on our Flood Hazard Assessment Tool (FHAT) (<http://gis.hawaiinfip.org/FHAT>).

If there are questions regarding the local flood ordinances, please contact the applicable County NFIP coordinating agency below:

- o Oahu: City and County of Honolulu, Department of Planning and Permitting (808) 768-8098.
- o Hawaii Island: County of Hawaii, Department of Public Works (808) 961-8327.
- o Maui/Molokai/Lanai County of Maui, Department of Planning (808) 270-7253.
- o Kauai: County of Kauai, Department of Public Works (808) 241-4846.

Signed: 
CARTY S. CHANG, CHIEF ENGINEER

Date: 
11/18/18

August 22, 2018

Mr. Russell Y. Tsuji, Land Administrator
Land Division
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, Hawai'i 96809



SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Tsuji:

Thank you for the January 19, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have the following responses to these comments divided by division.

Land Division, Oʻahu District

We acknowledge that the Land Division, Oʻahu District has no comments to offer at this time.

Engineering Division

Thank you for information on the federal regulations concerning special flood hazards areas, and the distinction between federal and local community flood ordinances.

The flood hazard zone designations of the Petition Area has been researched, and will be discussed in the Draft Environmental Impact Statement as well as the project impact on flood hazard areas. Flood Insurance Rate Map and the state's Flood Hazard Assessment Tool were used to identify existing flood designations.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR



MAJOR GENERAL ARTHUR J. LOGAN
DIRECTOR OF EMERGENCY MANAGEMENT

VERN T. MIYAGI
ADMINISTRATOR OF EMERGENCY MANAGEMENT

PHONE (808) 733-4300
FAX (808) 733-4287

STATE OF HAWAII
DEPARTMENT OF DEFENSE
OFFICE OF THE DIRECTOR OF EMERGENCY MANAGEMENT / CIVIL DEFENSE
3949 DIAMOND HEAD ROAD
HONOLULU, HAWAII 96816-4495

January 17, 2018

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

Dear Mr. Sato:

Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice

Thank you for the opportunity to comment on this proposed project.

After reading the documents provided for the project, we have determined that there is no siren coverage for the project area. Therefore, we request that one 121 db(c) omni-directional siren be installed on the property. We will work with the developer to determine the best location for the siren site.

If you have any questions please call Ms. Havinne Okamura, Hazard Mitigation Planner, at (808) 733-4300, extension 556.

Sincerely,

VERN T. MIYAGI
Administrator of Emergency Management



August 22, 2018

Mr. Vern T. Miyagi, Administrator of Emergency Management
Office of the Director of Emergency Management / Civil Defense
Department of Defense
State of Hawai'i
3949 Diamond Head Road
Honolulu, Hawai'i 96816

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Miyagi:

Thank you for the January 17, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

We appreciate your assessment of siren coverage for the project area, and note your comment that there is no siren coverage for the project area. HMP would allow the State Department of Defense (DoD) to lease a site, and fund and construct a 121 dc(c) omni-directional siren within the cemetery property to improve siren coverage of the area. HMP would coordinate with your agency on the appropriate location for such improvement, if pursued by the State DoD.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.



STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to:
File:

EPO 17-331

January 18, 2018

Mr. Ronald Sato, AICP
HHF Planners
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Email: rsato@hhf.com

Dear Mr. Sato:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN) for Proposed Hawaiian Memorial Park Expansion
TMK: (1) 4-5-033:001 (por)

#1 The Department of Health (DOH), Environmental Planning Office (EPO), acknowledges receipt of your EISPN to our office via the OEQC link:
http://oeqc2.doh.hawaii.gov/EA_EIS_Library/2017-12-23-OA-EISPN-Hawaiian-Memorial-Park.pdf

We understand from the OEQC publication form project summary that *"In order to expand HMP, the project reclassify a 53.45 acre portion of a larger 164.4 acre parcel from the Conservation District to the Urban District. Proposed improvements within the Petition Area consist of two main components: 1) expansion of the HMP cemetery and (2) creation of a 14.5 acre cultural preserve immediately to the northeast of the expansion area."*

Hawaii's environmental review laws require Environmental Assessments (EAs) and Environmental Impact Statements (EISs) to consider health in the discussion and the mitigation measures to reduce negative impacts. In its definition of 'impacts,' §11-200-2, Hawaii Administrative Rules (HAR) includes health effects, whether primary (direct), secondary (indirect), or cumulative. Further, §11-200-12(b)(5), HAR, lists public health as one of the criteria for determining whether an action may have a significant impact on the environment.

#2 In the development and implementation of all projects, EPO strongly recommends regular review of State and Federal environmental health land use guidance. State standard comments to support sustainable healthy design are provided at: <http://health.hawaii.gov/epo/landuse>. Projects are required to adhere to all applicable standard comments. If you haven't already, EPO recommends that you view the free, on-demand, six part Plan4Health webinar series available on the American Planning Association website at: <https://www.planning.org/nationalcenters/health/planners4health>

EPO also encourages you to examine and utilize the Hawaii Environmental Health Portal at: <https://eha-cloud.doh.hawaii.gov>. This site provides links to our e-Permitting Portal, Environmental Health Warehouse, Groundwater Contamination Viewer, Hawaii Emergency Response Exchange, Hawaii State and Local Emission Inventory System, Water Pollution Control Viewer, Water Quality Data, Warnings, Advisories and Postings.


#3 We suggest you review the requirements of the Clean Water Branch (Hawaii Administrative Rules {HAR}, Chapter 11-54-1.1, -3, 4-8) and/or the National Pollutant Discharge Elimination System (NPDES) permit (HAR, Chapter 11-55) at: <http://health.hawaii.gov/cwb>. If you have any questions, please contact the Clean Water Branch (CWB), Engineering

Section at (808) 586-4309 or cleanwaterbranch@doh.hawaii.gov. If your project involves waters of the U.S., it is highly recommended that you contact the Army Corps of Engineers, Regulatory Branch at: (808) 835-4303.

- #4 Please note that all wastewater plans must conform to applicable provisions (HAR, Chapter 11-62, "Wastewater Systems"). We reserve the right to review the detailed wastewater plans for conformance to applicable rules. Should you have any questions, please review online guidance at: <http://health.hawaii.gov/wastewater> and contact the Planning and Design Section of the Wastewater Branch (WWB) at (808) 586-4294.
- #5 If temporary fugitive dust emissions could be emitted when the project site is prepared for construction and/or when construction activities occur, we recommend you review the need and/or requirements of the Clean Air Branch (CAB), (HAR, Chapter 11-60.1 "Air Pollution Control"). Effective air pollution control measures need to be provided to prevent or minimize any fugitive dust emissions caused by construction work from affecting the surrounding areas. This includes the off-site roadways used to enter/exit the project. The control measures could include, but are not limited to, the use of water wagons, sprinkler systems, and dust fences. For questions contact the Clean Air Branch via e-mail at: Cab.General@doh.hawaii.gov or call (808) 586-4200.
- #6 Any waste generated by the project (that is not a hazardous waste as defined in state hazardous waste laws and regulations), needs to be disposed of at a solid waste management facility that complies with the applicable provisions (HAR, Chapter 11-58.1 "Solid Waste Management Control"). The open burning of any of these wastes, on or off site, is strictly prohibited. You may wish you review the Minimizing Construction & Demolition Waste Management Guide at: <http://health.hawaii.gov/shwb/files/2016/05/constdem16.pdf> Additional information is accessible at: <http://health.hawaii.gov/shwb>. For specific questions call (808) 586-4226.
- #7 If noise created during the construction phase of the project may exceed the maximum allowable levels (HAR, Chapter 11-46, "Community Noise Control") then a noise permit may be required and needs to be obtained before the commencement of work. Relevant information is online at: <http://health.hawaii.gov/irhb/noise> EPO recommends you contact the Indoor and Radiological Health Branch (IRHB) at (808) 586-4700 with any specific questions.
- #8 The Hawaii Disability and Communication Access Board (DCAB) recommends the inclusion of access for persons with disabilities through all phases of design and construction. New construction and alteration work shall comply with all applicable accessibility requirements. Projects covered by §103-50, Hawaii Revised Statutes, and HAR Title 11 Chapter 216 shall seek advice and recommendations from DCAB on any construction plans prior to commencing with construction. If you have any questions please contact DCAB at (808) 586-8121 or dcab@doh.hawaii.gov.
- #9 To better protect public health and the environment, the U.S. Environmental Protection Agency (EPA) has developed an environmental justice (EJ) mapping and screening tool called EJSCREEN. It is based on nationally consistent data and combines environmental and demographic indicators in maps and reports. EPO encourages you to explore, launch and utilize this powerful tool in planning your project. The EPA EJSCREEN tool is available at: <http://www.epa.gov/ejscreen>.

We hope this information is helpful. If you have any questions please contact us at DOH.epo@doh.hawaii.gov or call us at (808) 586-4337. Thank you for the opportunity to comment.

Mahalo nui loa,



Laura Leialoha Phillips McIntyre, AICP
Environmental Planning Office

LM:nn

Attachment: U.S. EPA EJSCREEN Report for Project Area

c: Jay Morford, GM, Hawaiian Memorial Life Plan, Ltd. (via email: Jay.Morford@dignitymemorial.com)
Daniel Orodener, Executive Director, LUC (via email: dbedt.luc.web@hawaii.gov)
DOH: DDEH, EMD, CWB, SDWB, WWB, SHWB, CAB, HEER, IRHB, SAN {via email only}



EJSCREEN Report (Version 2017)



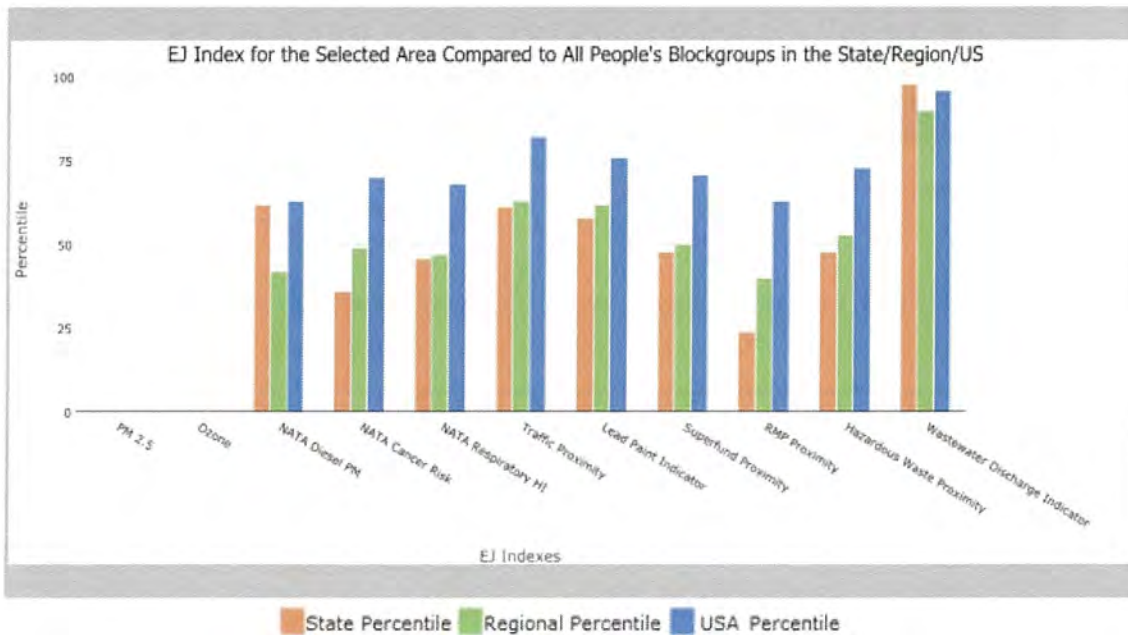
1 mile Ring Centered at 21.394220,-157.787652, HAWAII, EPA Region 9

Approximate Population: 8,447

Input Area (sq. miles): 3.14

(The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
EJ Indexes			
EJ Index for PM2.5	N/A	N/A	N/A
EJ Index for Ozone	N/A	N/A	N/A
EJ Index for NATA* Diesel PM	62	42	63
EJ Index for NATA* Air Toxics Cancer Risk	36	49	70
EJ Index for NATA* Respiratory Hazard Index	46	47	68
EJ Index for Traffic Proximity and Volume	61	63	82
EJ Index for Lead Paint Indicator	58	62	76
EJ Index for Superfund Proximity	48	50	71
EJ Index for RMP Proximity	24	40	63
EJ Index for Hazardous Waste Proximity	48	53	73
EJ Index for Wastewater Discharge Indicator	98	90	96



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

1 mile Ring Centered at 21.394220,-157.787652, HAWAII, EPA Region 9

Approximate Population: 8,447

Input Area (sq. miles): 3.14

(The study area contains 1 blockgroup(s) with zero population.)



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJSCREEN Report (Version 2017)



1 mile Ring Centered at 21.394220,-157.787652, HAWAII, EPA Region 9

Approximate Population: 8,447

Input Area (sq. miles): 3.14

(The study area contains 1 blockgroup(s) with zero population.)

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Environmental Indicators							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$)	N/A	N/A	N/A	9.9	N/A	9.14	N/A
Ozone (ppb)	N/A	N/A	N/A	41.8	N/A	38.4	N/A
NATA* Diesel PM ($\mu\text{g}/\text{m}^3$)	0.205	0.149	79	0.978	<50th	0.938	<50th
NATA* Cancer Risk (lifetime risk per million)	40	34	81	43	<50th	40	50-60th
NATA* Respiratory Hazard Index	1.3	1	80	2	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	440	1000	64	1100	57	590	75
Lead Paint Indicator (% Pre-1960 Housing)	0.2	0.16	68	0.24	57	0.29	51
Superfund Proximity (site count/km distance)	0.051	0.1	45	0.15	36	0.13	43
RMP Proximity (facility count/km distance)	0.085	0.39	20	0.98	7	0.73	12
Hazardous Waste Proximity (facility count/km distance)	0.061	0.1	50	0.12	48	0.093	55
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.68	0.04	98	13	89	30	95
Demographic Indicators							
Demographic Index	46%	51%	31	47%	49	36%	69
Minority Population	80%	77%	44	59%	69	38%	84
Low Income Population	12%	26%	21	36%	14	34%	14
Linguistically Isolated Population	1%	6%	27	9%	21	5%	48
Population With Less Than High School Education	6%	9%	44	17%	28	13%	31
Population Under 5 years of age	6%	6%	49	7%	46	6%	50
Population over 64 years of age	25%	16%	88	13%	91	14%	91

* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

For additional information, see: www.epa.gov/environmentaljustice

EJSCREEN is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJSCREEN outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

August 22, 2018

Ms. Laura Leialoha Phillips McIntyre, Program Manager
Environmental Planning Office
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, Hawai'i 96801



SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāne'ohe, O'ahu, Hawai'i

Dear Ms. McIntyre:

Thank you for the January 18, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We are sorry to see that this office has closed in May 2018 due to federal EPA funding reductions. Nevertheless, we have provided responses under subheadings corresponding to your comments.

1. Your understanding of the project discussed is consistent with the EISPN and that described in the Draft Environmental Impact Statement (DEIS). We are aware of the State's environmental review regulations, and the DEIS addresses various areas of public health, and identifies mitigative measures, if necessary.
2. Federal, state, and city environmental health land use guidance regulations have been reviewed, and pertinent regulations addressed in sections of the DEIS. Thank you for providing information relating to State sustainable healthy design. The standard comments referred to in your letter have been reviewed, and reflect more generic comments from various branches that identify various regulations and permits, and are not specific to any particular site or project. Many of these standard comments have been received and addressed as part of comments from respective State Department of Health branches. Some are not applicable to this site or project, and other regulatory requirements would be more appropriately addressed as part of the project's design phase.

Thank you for providing links to the Hawai'i Environmental Health Portal and the American Planning Association Plan4Health webinar. The Plan4Health is a generic educational webinar allowing certified planners to obtain credits as part of certification maintenance, and is not specific or pertinent to this site or project. The Environmental Health Portal has various information that was examined, however, some information is not pertinent to this project such as the Hawai'i Emergency Response Exchange that's intended for emergency responders or Clean Water Branch water quality advisories. The DEIS also includes several technical studies that provide new or updated information more pertinent to this project site.

3. Clean Water Branch requirements along with NPDES permit requirements have been reviewed and are addressed in pertinent sections of the DEIS. The project does not involve waters of the U.S.
4. The project does not include improvements, such as restroom facilities, that would generate wastewater requiring review by the Wastewater Branch.
5. Construction activities could result in fugitive dust emissions. The Clean Air Branch requirements are discussed in the DEIS, which includes addressing this short-term impact along with identifying best management practices that can be incorporated into future design plans to mitigate this.
6. The project would generate some waste during construction activities, and such material would be properly disposed of at an approved solid waste management facility. No open burning of wastes would occur within the project site. The long-term operation of this expanded cemetery and cultural preserve is expected to generate minimal solid waste, and such waste would predominantly consist of landscaping material. Design plans would look to reducing, reusing, and recycling construction and demolition waste as suggested in the management guide identified.
7. The DEIS addresses short-term construction-related noise and its effects on surrounding uses. A noise permit would be obtained for such construction activities by the contractor.
8. The project does not involve a public building, facility, or site as defined under the regulations noted, which pertain to state or county facilities or funded projects. However, the Hawai'i Disability and Communication Access Board (DCAB) could be consulted during the project's design phase to address site improvements compliance with DCAB accessibility requirements, if applicable.
9. Thank you for information on the US Environmental Protection Agency's EJSCREEN mapping tool. This project does not involve federal environmental justice issues or requirements. The DEIS also includes detailed information on the socio-economic background of the community, and discusses how the project would result in minimal impacts.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR OF HAWAII



VIRGINIA PRESSLER, M.D.
DIRECTOR OF HEALTH

STATE OF HAWAII
DEPARTMENT OF HEALTH
P. O. BOX 3378
HONOLULU, HI 96801-3378

In reply, please refer to
File:

LUD – 1 4 5 033 001 Hawn
Mem Park Prop Exp-ID3826

December 28, 2017

Mr. Daniel E. Orodener, Executive Director
Land Use Commission
Department of Business, Economic Development & Tourism
State of Hawaii
P.O. Box 2359
Honolulu, Hawaii 96804
Email: dbedt.luc.web@hawaii.gov

Dear Mr. Orodener:

Subject: Docket No. A17-804 Hawaiian Memorial Park Life Plan, Ltd.
Environmental Impact State Preparation Notice (EISPN)
Proposed Hawaiian Memorial Park (HMP) Expansion
45-425 Kam Hwy, Kaneohe, HI 96744 TMK (1) 4-5-033: 001 (portion)

Thank you for allowing us the opportunity to provide comments for the subject EISPN. The subject EISPN mentions that the proposed expansion of the cemetery may include restroom facilities. It also states that HMP utilizes an approved septic system. Any proposals to increase the wastewater flows to an approved septic system will need to be reassessed. A licensed engineer will need to be retained to evaluate the existing approved septic system to ensure that it is designed and constructed to handle the additional wastewater flows from the proposed project.

All wastewater plans must conform to applicable provisions of the Hawaii Administrative Rules, Chapter 11-62, "Wastewater Systems."

Should you have any questions, please call Mr. Mark Tomomitsu of our office at 586-4294.

Sincerely,

SINA PRUDER, P.E., CHIEF
Wastewater Branch

LM:sp

c: Ms. Laura McIntyre, DOH-EPO, via email
Mr. Ron Sato, AICP, via email: rsato@hhf.com

August 22, 2018



Ms. Sina Pruder, Chief
Wastewater Branch
Department of Health
State of Hawai'i
P.O. Box 3378
Honolulu, Hawai'i 96801-3378

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāne'ohe, O'ahu, Hawai'i

Dear Ms. Pruder:

Thank you for the December 28, 2017 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

Construction of restroom facilities within the cemetery expansion area is not being considered under the proposed project. Consequently, there would be no expansion of HMP's existing septic system, and flows associated with this system do not need to be reassessed.

We acknowledge that all wastewater plans must conform to applicable provisions of Hawai'i Administrative Rules, Chapter 11-62, "Wastewater Systems".

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR



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

JADE T. BUTAY
INTERIM DIRECTOR

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

IN REPLY REFER TO:
DIR 1617
STP 8.2323

February 21, 2018

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

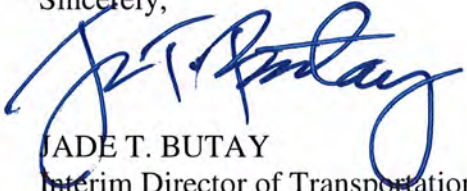
Dear Mr. Sato:

Subject: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice
Kaneohe, Oahu, Hawaii
TMK: (1) 4-5-033:001 (Por.)

The applicant, Hawaiian Memorial Life Plan, Ltd., which owns and manages Hawaiian Memorial Park (Memorial Park), proposes an expansion of the area of the Memorial Park to ensure that a sufficient supply of burial plots can be maintained. The applicant proposes reclassification of a 53.45 acre 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. It is not anticipated the subject project will have a significant impact to State highway facilities.

If there are any questions, please contact Mr. Blayne Nikaido of the Department of Transportation, Statewide Transportation Planning Office at telephone number (808) 831-7979.

Sincerely,



JADE T. BUTAY
Interim Director of Transportation

c: Scott Derrickson, Department of Business, Economic Development and Tourism,
Land Use Commission



August 22, 2018

Ms. Jade T. Butay, Director
Department of Transportation
State of Hawai'i
869 Punchbowl Street
Honolulu, Hawai'i 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Ms. Butay:

Thank you for the February 21, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

Your understanding of the project is consistent with the EISPN and that described in the Draft Environmental Impact Statement (DEIS). We acknowledge your assessment that the proposed project is not expected to significantly impact State highway facilities.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DAVID Y. IGE
GOVERNOR OF
HAWAII



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
KATHOOLAWE ISLAND RESERVE COMMISSION
LAND
STATE PARKS

REF:OCCL:TM

Correspondence: OA 18-126

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

JAN 10 2018

SUBJECT: Environmental Impact Statement (EIS) Preparation Notice for the Proposed Hawaiian Memorial Park Expansion Project Located at Kāneʻohe, Koʻolaupoko, Oʻahu, TMK: (1) 4-5-003:001

Dear Mr. Sato:

- #1 The Office of Conservation and Coastal Lands (OCCL) has reviewed the subject matter in addition to the Decision and Order of the past petition filed with the State Land Use Commission noted as Docket No. A07-777. The applicant is now petitioning the State Land Use Commission (LUC) to reclassify 53.45-acres of the noted parcel, from the State Land Use Conservation District to the Urban District.
- #2 The project involves lands in the General and Limited Subzone of the Conservation District. The Hawai'i Administrative Rules (HAR), Chapter 13-5 states the objective of the General Subzone is *to designate open space where specific conservation uses may not be defined, but where urban use would be premature*; and the objective of the Limited Subzone is *to limit uses where natural conditions suggest constraints on human activities*.
- #3 We have attached our previous correspondence dated October 29, 2008 in response to the Final EIS that was published November 23, 2008 in *the Environmental Bulletin* for the past petition action as these concerns remain.
- #4 In addition, the OCCL would like to see other alternatives be proposed in the draft EIS pursuant to HAR §11-200-8-17(f).

Should you have any questions regarding this correspondence, contact Tiger Mills of our Office at (808) 587-0382.

Sincerely,

A handwritten signature in blue ink, appearing to read "Samuel J. Lemmo", written over a large blue circular stamp.

Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

C: Chairperson
ODLO
LUC

LINDA LINGLE
GOVERNOR OF HAWAII



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
OFFICE OF CONSERVATION AND COASTAL LANDS

POST OFFICE BOX 621
HONOLULU, HAWAII 96809

Laura H. Thielen
Chairperson
Board of Land and Natural Resources
Commission on Water Resource Management

Russell Y. Tsuji
First Deputy

Ken C. Kawahara
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
Kahoala We Island Reserve Commission
Land
State Parks

REF:OCCL:MC

Correspondence: OA-08-270 (c)

OCT 29 2008

Abbey Seth Mayer, Director
State Office of Planning
Department of Business, Economic Development & Tourism
235 South Beretania Street, 6th Floor
Honolulu, HI 96813

Dear Mr. Mayer,

SUBJECT: Petition for Amendment to the State Land Use District Boundaries
Hawaiian Memorial Park
Kāneʻohe, Koʻolaupoko, Oʻahu
TMK (1) 4-5-33:1

#5 The Office of Conservation and Coastal Lands (OCCL) has reviewed the Final Environmental Impact Statement (FEIS) that your office provided us regarding the proposed Hawaiian Memorial Park expansion. Part of the project requires reclassifying 47 acres in the General Subzone and 9 acres in the Limited Subzone from Conservation to Urban. OCCL has unresolved concerns regarding the petition to amend the boundaries, and asks that the State take these into consideration when making its final recommendation to the Land Use Commission.

#6 In the Draft EIS, OCCL asked that the applicant fully explain why the specific subzone objectives are no longer applicable to the subject parcel. The applicant's full response is attached. OCCL's remaining concerns are as follows:

- The applicant states that they have modified the proposed project to remove the residential subdivision, and to establish a "cultural preserve" near the known archeological sites.

OCCL considers the modifications irrelevant to the boundary amendment question. Rezoning the land opens it to *all* identified Urban land uses, not just the specific project at hand. OCCL finds nothing in the proposal that would limit the current or any future landowner from increasing the intensity of development on the parcel once it is rezoned. **We believe that an applicant must conclusively show that Conservation District objectives are no longer applicable or are not being met if land is to be reclassified.**

- The applicant states that the General Subzone area is a disturbed Schefflera/Java plum forest, that only 8% of the species are native, and that *the property does not function as a forest reserve for recharge areas*. The applicant also states that *the property will remain predominately in vegetated open space*.

OCCL finds the language used here to be slightly disingenuous. The presence of, and even the domination by, invasive species on a parcel does not mean that the land no longer serves an

ecological purpose. The fact that the property is not in the forest reserve has no bearing on its function as a water recharge area.

Although a parcel might be dominated by invasive species, OCCL is of the position that it can still provide important ecological functions. These include, but are not limited to, providing a greenbelt to the existing urban area, limiting soil erosion and runoff, trapping carbon, providing a nesting area for birds, and providing a counterpart to the neighboring urban heat island¹.

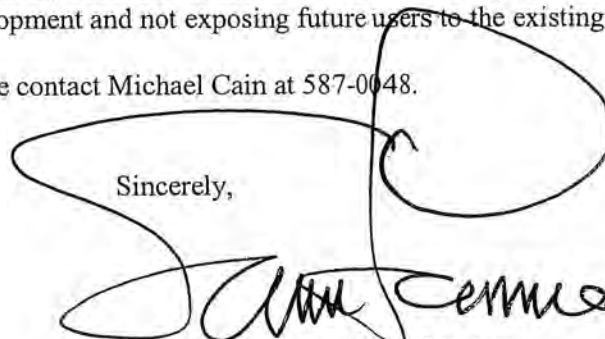
OCCL notes that the forest contains multiple levels; at its simplest this includes groundcover, shrubs, and the canopy. While the forest and a lawn might both be, as the application states, "vegetated open space," OCCL does not believe that they fulfill the same ecological functions.

- #8
- The applicant states that 4.7 of the acres in the Limited Subzone will be set aside as a cultural preserve and will not be changed except for the addition of a road; only 4.9 acres will be used as a cemetery. Their slope stability found no apparent hazards associated with slope stability, that most slopes in the area are less than 20%, and that some land in the higher areas will need to be graded to ensure stability. The applicant acknowledges that there is a potential for hazards associated with rockfalls, but that *these can be mitigated using available technology*.

Again, OCCL would note that reclassifying the land would open this area to all potential identified urban land uses. OCCL also questions the need to use technology to mitigate hazards when the simpler, less hazardous, solution would be to not reclassify the Limited subzone, thereby not opening it to development and not exposing future users to the existing hazards.

If you have any further questions please contact Michael Cain at 587-0048.

Sincerely,



Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands

cc: DLNR Chair,
Helber Hastert & Fee (attn: Scott Ezer),
Hui O Piko`iloa (attn: Julianne McCreedy), 45-423 `Ōhāhā St., Kāne`ohe, HI 96744
Grant Yoshimori, 45-464 Līpahu St., Kāne`ohe, HI 96744

attachment: Helber Hastert & Fee response letter to OCCL

¹ OCCL notes that recent studies on heat islands have shown that grassy areas such as golf courses (the nearest analogous land use to a cemetery that we could find in the literature) radiate approximately four times the thermal energy than does a forest with an intact canopy. Residential areas, for comparison, radiate approximately seven times the energy as the forest.



August 22, 2018

Ms. Samuel J. Lemmo, Administrator
Office of Conservation and Coastal Lands
Department of Land and Natural Resources
State of Hawai'i
P.O. Box 621
Honolulu, Hawai'i 96809

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Lemmo:

Thank you for the January 10, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. Your understanding of the applicant's petition to the State Land Use Commission to reclassify the project site to the State Urban District is correct.
2. We confirm that the Petition Area includes designated lands within both the General and Limited Subzones of the Conservation District, and the Draft Environmental Impact Statement (DEIS) includes a figure showing these subzones. The DEIS also includes a section addressing the project's relation to the objectives of both these subzones.
3. We have reviewed the comments discussed in your attached October 29, 2008 correspondence, and have included responses to those comments as they relate to this current petition under a separate heading below.
4. Other alternatives to the proposed project in addition to those discussed in the EISPN will be discussed and evaluated in the Draft EIS.
5. We believe the concerns your department had with prior project plans in 2008 have been addressed by the current proposed project. The DEIS includes information addressing the project's need, several technical studies addressing specific resource and engineering concerns, and addresses the project's relation to the Conservation District. This information should help address your department's unresolved concerns.

6. The DEIS prepared for this current petition fully explains why the subzone objectives are no longer applicable or appropriate to the property. The objective of the General subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature. Conservation Districts in 1964 only included General Use and Restricted Watershed subzones. Under those rules, many urban uses were permitted in the General Use subzone, such as residences, recreational facilities, and even commercial uses (e.g. restaurants, hotel). With revisions to Conservation District rules in 1981 which included updated subzone maps dated 1978, much of the property was placed in the new General subzone designation. Plans developed in 1977 by State DLNR to support Conservation District maps identified the Petition Area as "scrub land." The DEIS discusses this background and the current applicability of the General subzone in more detail.

To address concerns with opening this Petition Area to all types of land uses permitted under the Urban District, a conservation easement is proposed to be managed by the Hawai'i Islands Land Trust that would restrict future development of the 156.5-acre property to only the proposed cemetery expansion project and Cultural Preserve. In this manner, the intensity of parcel development will be limited should the parcel be rezoned to only allow for execution of the proposed project. The Petitioner is also amenable to a condition of approval for the boundary change limiting future use. It should be noted that the City Council did limit use of the property to cemetery purposes when it amended the County Ko'olau Poko Sustainable Communities Plan in 2017.

7. An updated botanical study was conducted and is included in the DEIS that addresses existing botanical resources within the Petition Area. The area's ability to function as groundwater recharge is also discussed in the DEIS, and a groundwater study determined that the area does not function as an important recharge area due to the underlying volcanics.

The Petition Area does have some ecological functions, and the impact of the proposed project on natural resources and characteristics contributing to these ecological functions has been assessed in the DEIS. Resources and characteristics assessed include topographic, drainage, vegetative, groundwater, and biotic characteristics. Design components and mitigative measures proposed should positively impact drainage, endangered invertebrate species populations found, and invasive fauna (e.g. pigs).

8. The DEIS includes updated grading plans intended to create gentle slopes as part of the cemetery expansion. The Cultural Preserve proposed would be 14.5 acres. A rockfall and slope hazard assessment was conducted, and identified measures to mitigate rockfall risk. These mitigative measures were incorporated into the design of the project and are discussed in the Draft EIS.

The DEIS also addresses the project's relationship to portions of the Petition Area within the Conservation District's Limited Subzone designation. As discussed previously, a conservation easement is proposed to restrict future development of the property to only the cemetery expansion project and Cultural Preserve, and should address concerns regarding other urban uses.

Mr. Samuel J. Lemmo, Administrator
State DLNR, OCCL

Page 3

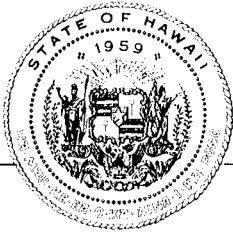
Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The signature is fluid and cursive.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.



OFFICE OF PLANNING STATE OF HAWAII

235 South Beretania Street, 6th Floor, Honolulu, Hawaii 96813
Mailing Address: P.O. Box 2359, Honolulu, Hawaii 96804

Telephone: (808) 587-2846
Fax: (808) 587-2824
Web: <http://planning.hawaii.gov/>

DAVID Y. IGE
GOVERNOR

LEO R. ASUNCION
DIRECTOR
OFFICE OF PLANNING

DTS201801170934BE

January 17, 2018

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

Dear Mr. Sato:

Subject: Environmental Impact Statement Preparation Notice (EISPN)
Hawaiian Memorial Park Cemetery Expansion Project
Tax Map Key: (1) 4-5-033: Por. 001
Kaneohe, Hawaii

Thank you for the opportunity to provide comments on the EISPN on the proposed expansion for the Hawaiian Memorial Park Cemetery Expansion project. The Petitioners are proposing to reclassify about 53.45 acres of land from the State Conservation to the Urban district in order to expand the Hawaiian Memorial Park Cemetery to provide additional ground interment and inurnment spaces, and also provide a 14.5-acre cultural preserve.

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

1. Pursuant to Hawaii Administrative Rules (HAR) § 11-200-10(4) – general description of the action's technical, economic, social, and environmental characteristics, this project must demonstrate that it is consistent with a number of state environmental, social, economic goals, and policies. Hawaii Revised Statutes (HRS) Chapter 226, the Hawaii State Planning Act, provides goals, objectives, policies, planning coordination and implementation, and priority guidelines for growth, development, and the allocation of resources throughout the state.

The Draft EIS should include a discussion on the project's ability to meet all parts of HRS Chapter 226. The analysis should examine consistency with these statutes or clarify where it is in conflict with them. If any of these statutes are not applicable to the project, the analysis should affirmatively state such determination, followed by discussion paragraphs.

2. The coastal zone management (CZM) area is defined as “all lands of the State and the area extending seaward from the shoreline to the limit of the State’s police power and management authority, including the U.S. territorial sea” (HRS § 205A-1).

The Draft EIS should include an assessment as to how the proposed action conforms to each of the goals and objectives as listed in HRS § 205A-2. Compliance with HRS § 205A-2 is an important component for satisfying the requirements of HRS Chapter 343.

3. Pursuant to HAR § 11-200-10(6) – identification and summary of impacts and alternatives considered; in order to ensure that the surface water and nearshore marine resources of Kaneohe Bay remain protected, the negative effects of stormwater inundation, potentially caused by the proposed development activities, should be evaluated in the Draft EIS.

Issues that may be examined include, but are not limited to, project site characteristics in relation to flood and erosion prone areas, open spaces, the potential vulnerability of surface water resources, drainage infrastructure currently in place, soil absorption characteristics of the area, and examining the amount of permeable versus impervious surfaces in the project area. These items should be considered when developing mitigation measures for the protection for surface water resources and the coastal ecosystem, pursuant to HAR § 11-200-10(7).

OP has developed a number of resources and recommends consulting these guidance documents and stormwater evaluative tools when developing strategies to address polluted runoff. They offer useful techniques to keep land-based pollutants and sediment in place and prevent nearshore water contamination while considering the best management practices (BMPs) suited for the project and the types of contaminants affecting the project area. The evaluative tools that should be used during the design process include:

- Hawaii Watershed Guidance provides direction on mitigation strategies for urban development activities that will safeguard watersheds and implement watershed plans [http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI Watershed Guidance Final.pdf](http://files.hawaii.gov/dbedt/op/czm/initiative/nonpoint/HI_Watershed_Guidance_Final.pdf)
- Stormwater Impact Assessments can be used to identify and analyze information on hydrology, sensitivity of coastal and riparian resources, and management measures to control runoff, as well as consider secondary and cumulative impacts to the area.
http://files.hawaii.gov/dbedt/op/czm/initiative/stomwater_impact/final_stormwater_impact_assessments_guidance.pdf

- Low Impact Development (LID), A Practitioners Guide covers a range of structural BMPs for stormwater control management, onsite infiltration techniques, water reuse methods, and building layout designs that minimize negative environmental impacts.
http://files.hawaii.gov/dbedt/op/czm/initiative/lid/lid_guide_2006.pdf
4. As confirmed by the enclosed review material, this project is within the State Land Use Conservation District. We note that the Petitioner has filed a State Land Use District Boundary Amendment with the Land Use Commission. Further, that the document indicates that the Draft EIS will include updated and new studies for cemetery capacity, traffic impacts, impacts to surface and groundwater, 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, and traffic impacts. OP concurs that these studies should be expanded and updated from the previous surveys done about 2008.
5. OP also has the following questions and concerns which should be addressed within the Draft EIS.
- a. Petitioner should include information regarding what the sustainable timeframe of the cemetery business and long-term maintenance of the business.
 - b. Petitioner should consider an alternative excluding the 14.5 acre area for the cultural preserve, and how the proposal would change if this were proposed.
 - c. The Cultural assessment study should also include a Kapaakai analysis.
 - d. The Draft EIS should also indicate any additional restrictions that may apply from county zoning, Land Study Bureau soil ratings, and related land-use regulatory constraints.

If you have any questions regarding this comment letter, please contact Lorene Maki of our office at (808) 587-2888.

Sincerely,



Leo R. Asuncion
Director

August 22, 2018



Mr. Leo Asuncion, Director
Office of Planning
State of Hawai'i
235 South Beretania Street, 6th Floor
Honolulu, Hawai'i 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Asuncion:

Thank you for the January 17, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. Your general project description is consistent with the EISPN and that described in the Draft Environmental Impact Statement (DEIS). We have provided responses under numbered subheadings corresponding to your numbered comments.

1. The Draft Environmental Impact Statement (EIS) includes a section addressing the project's consistency with pertinent goals, objectives, and policies of the Hawai'i State Planning Act.

All objectives, policies and priority guidelines of the Hawai'i State Planning Act were reviewed. Those policies not applicable to the project were identified and their inapplicability is clear based upon the policy description.
2. The DEIS includes background discussion of the Coastal Zone Management (CZM) area, and addresses the project's consistency with objectives and policies. The Petition Area is not located within the City and County of Honolulu's Special Management Area, and federal CZM consistency review is not required because no federal funds or permits would be required.
3. The project's impact to Petition Area drainage conditions and the water quality of associated water resources are addressed in the DEIS. This includes addressing the project's effect on Kāneʻohe Bay. It should be noted that the project would have a beneficial effect by improving water quality by reducing erosion, silt and other pollutants that currently discharge from the project area.

The DEIS includes a water quality study and preliminary engineering report addressing drainage conditions and proposed improvements. Flood hazards are discussed along with current erosion characteristics. Open spaces are addressed as part of visual impacts and the existing watershed. Surface water resources, such as existing drainageways, are also addressed. Analysis indicates the project would improve drainage conditions, thereby not adversely impacting existing drainage infrastructure. A geotechnical study was conducted that provides information on existing soils

and soil characteristics, which have been factored in proposed conceptual and preliminary designs. The change in pervious and impervious area associated with the project is addressed, and detention basins proposed would reduce the current volume of stormwater runoff generated by the Petition Area. Necessary mitigative measures are discussed in the DEIS.

The preliminary engineering analysis resulted in the incorporation of measures in the project design that will mitigate adverse drainage and water quality impacts related to the proposed project.

Thank you for referring us to the guidance documents and evaluative tools suggested. These documents would be referenced during the project's design phase. Several of the concepts in those documents have already been incorporated in the planning process and preliminary design phase. For example, the concepts from the stormwater impact assessment have been incorporated as the DEIS includes a detailed discussion of existing watershed and stormwater conditions along with changes resulting from the project based upon several technical studies. In addition, this environmental review process allows for agency review of stormwater impact analysis, low-impact development concepts have been incorporated in project plans, and best management practices have been identified.

4. The DEIS includes several technical studies addressing the areas identified. Some of these technical studies update or supplement prior studies already conducted for this area. Other areas have been addressed in the DEIS such as availability of using non-potable water for irrigation and wastewater.
5. The questions and concerns noted are discussed and addressed in the DEIS.
 - a. The Draft EIS will provide an approximate timeframe for the sale of cemetery burial plots. The sale of cemetery burial plots would provide additional funds to HMP's Perpetual Care Trust account that are used for the long-term maintenance of the cemetery. Once all burial plots in the cemetery expansion area are sold, HMP would appropriately maintain the cemetery expansion area as well as existing areas of HMP.
 - b. The alternative involving exclusion of the 14.5 acre Cultural Preserve area from the Petition Area has been considered and addressed in the Draft EIS. The Preserve needs to be included as part of the Petition Area because new burials following traditional native Hawaiian protocols are planned in this area. Such activities are not permitted in the Conservation District.
 - c. The Cultural Impact Assessment (CIA) is consistent with and follows the analytical framework established in *Ka Pa'akai O Ka 'Āina v. Land Use Commission*, 2000 for assessing impacts to cultural resources.
 - d. The DEIS addresses how regulatory constraints governing Petition Area lands impact the project, which includes a discussion of City zoning regulations applicable to the site, Land Study Bureau soil ratings, and other regulatory requirements.

Mr. Leo R. Asuncion, Director
State Office of Planning

Page 3

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The signature is fluid and cursive.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

BOARD OF WATER SUPPLY

CITY AND COUNTY OF HONOLULU
630 SOUTH BERETANIA STREET
HONOLULU, HI 96843
www.boardofwatersupply.com



January 17, 2018

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair
KAPUA SPROAT, Vice Chair
DAVID C. HULIHEE
KAY C. MATSUI
RAY C. SOON

ROSS S. SASAMURA, Ex-Officio
JADE T. BUTAY, Ex-Officio

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

ELLEN E. KITAMURA, P.E.
Deputy Manager and Chief Engineer *ek*

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

Dear Mr. Sato:

Subject: Your Letter Dated December 19, 2017 Requesting Comments on the Environmental Impact Statement Preparation Notice Regarding the Hawaiian Memorial Park Cemetery Expansion Project in Kaneohe – Tax Map Key: 4-5-033: 001

#1 Thank you for your letter regarding the proposed expansion project.

The existing water system is adequate to accommodate the proposed development. However, please be advised that this information is based upon current data, and therefore, the Board of Water Supply reserves the right to change any position or information stated herein up until the final approval of the building permit application. The final decision on the availability of water will be confirmed when the building permit application is submitted for approval.

#2 The developer shall investigate the feasibility of using non-potable water for irrigation of the proposed cemetery expansion. The developer should evaluate the Halekou irrigation wells that are currently used to irrigate the Hawaii State Veteran's Cemetery. If non-potable water is either unavailable or infeasible, a report of the investigation including proposed irrigation demands should be submitted to us before we will consider the use of potable water.

#3 When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission and daily storage.

The on-site fire protection requirements should be coordinated with the Fire Prevention Bureau of the Honolulu Fire Department.

If you have any questions, please contact Robert Chun, Project Review Branch of our Water Resources Division at 748-5443.

Very truly yours,

ERNEST Y. W. LAU, P.E.
Manager and Chief Engineer

cc: Scott Derrickson, State of Hawaii Land Use Commission



August 22, 2018

Mr. Ernest Y.W. Lau, P.E., Manager and Chief Engineer
Board of Water Supply
City & County of Honolulu
630 S. Beretania Street
Honolulu, HI 96843

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Lau:

Thank you for the January 17, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. We confirm your determination that the County water system is adequate to accommodate the Proposed Action. No buildings are proposed under this project; therefore, no building permits are required. However, plans would be coordinated with your agency for review as part of the design phase and grading permit process. We understand final decisions regarding water availability will be confirmed as part of this review. We acknowledge that the Water Systems Facilities Charges for resource development, transmission, and daily storage must be paid when water is made available.
2. The feasibility of non-potable water use for irrigation of the proposed cemetery expansion is addressed in the Draft Environmental Impact Statement (DEIS). In summary, use of non-potable water for irrigation is not feasible because the Petition Area and HMP property are not suitable for development of even a moderate capacity well anywhere due to the Kailua volcanics beneath. The Halekou wells are fairly shallow and at an elevation that would not support serving the higher elevation of the cemetery expansion area. The projected irrigation demand for the cemetery expansion is low due to the climate conditions in the Kāneʻohe area. A report documenting proposed irrigation demands along with more details addressing the infeasibility of these wells would be submitted to the Board of Water Supply during the project's design phase.

3. When water is made available, the applicant would pay the water system facilities charges for resource development, transmission and daily storage.

No on-site fire protection requirements should be necessary for the cemetery expansion or Cultural Preserve because no buildings are proposed. Internal access roads would provide sufficient access for emergency vehicles. Necessary coordination with the Honolulu Fire Department would be conducted during the project's design phase.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

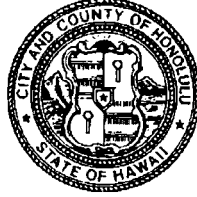


Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DEPARTMENT OF COMMUNITY SERVICES
CITY AND COUNTY OF HONOLULU

925 DILLINGHAM BOULEVARD, SUITE 200 • HONOLULU, HAWAII 96817
PHONE: (808) 768-7762 • FAX: (808) 768-7792
www.honolulu.gov/dcs



KIRK CALDWELL
MAYOR

PAMELA A. WITTY-OAKLAND
DIRECTOR

SUSAN L. FERNANDEZ
DEPUTY DIRECTOR

January 22, 2018

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

Dear Mr. Sato:

SUBJECT: Environmental Impact Statement Preparation Notice (EISPN)
Hawaiian Memorial Park Cemetery Expansion Project
Kaneohe District, Oahu, Hawaii
Tax Map Key: (1) 4-5-003: 033: por. 001 (Private Property)

Thank you for the opportunity to review the request regarding HHF Planners Environmental Impact Statement Preparation Notice (EISPN) for the Hawaiian Memorial Park Cemetery Expansion project.

Our review of the provided document indicates that the proposed project will have no adverse impacts on any Department of Community Services' activities or projects at this time.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan L. Fernandez", is written over the typed name of Pamela A. Witty-Oakland.

Pamela A. Witty-Oakland
Director

PAW:ta

cc: Mr. Scott Derrickson
Department of Business, Economic Development & Tourism



August 22, 2018

Ms. Pamela A. Witty-Oakland, Director
Department of Community Services
City & County of Honolulu
925 Dillingham Boulevard, Suite 200
Honolulu, HI 96817

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Ms. Witty-Oakland:

Thank you for the January 22, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

We acknowledge the Department of Community Services' (DCS) assessment that the proposed project will not adversely impact DCS activities or projects at this time.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'R A Sato'.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

Ronald Sato

From: Epenesa, Karen <kepenesa@honolulu.gov>
Sent: Thursday, December 28, 2017 11:39 AM
To: Ronald Sato; 'scott.a.derrickson@hawaii.gov'
Subject: Hawaiian Memorial Park Cemetery Expansion Project

Follow Up Flag: Follow up
Flag Status: Completed

This email is being sent on behalf of Director Melvin Kaku:

In response to your letter enclosing the EISPN providing public notice dated December 19, 2017, the Department of Emergency Management, City and County of Honolulu, has no comments at this time. We look forward to reviewing your Draft EIS when its available.

**Mahalo,
Karen**

Karen Epenesa, Secretary
City & County of Honolulu | Department of Emergency Management
ph: (808) 723-8950 | fax: (808) 768-1492

--

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August 22, 2018

Mr. Melvin Kaku, Director
Department of Emergency Management
City & County of Honolulu
650 South King Street, Basement
Honolulu, HI 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Kaku:

Thank you for the email sent on your behalf by Karen Epenesa, dated December 28, 2018, providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project.

We acknowledge that the Department of Emergency Management has no comments at this time.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'R A Sato'.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DEPARTMENT OF FACILITY MAINTENANCE
CITY AND COUNTY OF HONOLULU

1000 Ulu'ohia Street, Suite 215, Kapolei, Hawaii 96707
Phone: (808) 768-3343 • Fax: (808) 768-3381
Website: www.honolulu.gov

KIRK CALDWELL
MAYOR



ROSS S. SASAMURA, P.E.
DIRECTOR AND CHIEF ENGINEER

EDUARDO P. MANGLALLAN
DEPUTY DIRECTOR

IN REPLY REFER TO:
DRM 18-6

January 4, 2018

HHF PLANNERS
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813
Attention: Mr. Richard Sato, AICP, Senior Associate

Dear Mr. Sato:

SUBJECT: Draft Environmental Impact Statement Preparation Notice (EISPN) for
Hawaiian Memorial Park Cemetery Expansion Project, Kaneohe, Hawaii.

#1 Thank you for the opportunity to review and to give our input regarding the subject project.

Our comments as follows:

- #2
- Once construction phase commence, install approved Best Management Practices (BMP) fronting all drainage facilities on Lipalu Street. What would be the drainage impact to Lipalu Street when construction is completed?
 - During construction and upon completion of project; any Damages/deficiencies to Lipalu Street right-of-way shall be corrected to City Standards and accepted by the City.

Should there be any questions, please call Mr. Kyle Oyasato of the Division of Road Maintenance at 768-3697.

Sincerely,

A handwritten signature in black ink, appearing to read "Ross S. Sasamura".

✓ Ross S. Sasamura, P. E.
for Director and Chief Engineer

CC: State of Hawaii, Land Use Commission – Mr. Scott Derrickson

August 22, 2018



Mr. Ross S. Sasamura, Director and Chief Engineer
Department of Facility Maintenance
City & County of Honolulu
1000 Ulu'ohia Street, Suite 215
Kapolei, HI 96707

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāne'ohe, O'ahu, Hawai'i

Dear Mr. Sasamura:

Thank you for the January 4, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your bulleted comments.

1. Approved best management practices would be implemented within the Petition Area, which is upslope from the Department of Facility Maintenance's (DFM) Lipalu Street drainage facilities. The proposed project's impact on Lipalu Street drainage facilities and Petition Area drainage conditions are addressed in the Draft Environmental Impact Statement. In summary, the project should not have a significant impact on the City's existing downstream drainage facilities because detention basins and other site improvements proposed would reduce stormwater runoff volumes and flow rates.
2. Damages to the Lipalu Street right-of-way resulting from construction and implementation of the proposed project would be corrected to City standards with acceptance by the City.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato". The signature is written in a cursive, flowing style.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 768-8000 • FAX: (808) 768-6041
DEPT. WEB SITE: www.honoluludpp.org • CITY WEB SITE: www.honolulu.gov

KIRK CALDWELL
MAYOR



KATHY K. SOKUGAWA
ACTING DIRECTOR

TIMOTHY F. T. HIU
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI
DEPUTY DIRECTOR

2017/GEN-26(ry)

January 22, 2018

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

Dear Mr. Sato:

We have the following comments on the Environmental Impact Statement Preparation Notice (EISPN) for the Hawaiian Memorial Park Cemetery Expansion Project:

1. The Draft Environmental Impact Statement (DEIS) should describe how the project intends to comply with the prevailing Rules Relating to Water Quality.
2. The DEIS shall explain how the rockfall hazards will be addressed.
3. The DEIS should expand and clarify the "Cultural Preserve" section on page 2-7 regarding the conservation easement to preserve the area that also appears to include language allowing the cemetery to expand into that area.

Thank you for the opportunity to comment. Should you have any questions, please contact Raymond Young, of our staff, at 768-8049.

Very truly yours,

A handwritten signature in blue ink, reading "Eugene H. Takahashi".

Eugene H. Takahashi
Deputy Director

EHT:ah
Doc 1552848



August 22, 2018

Mr. Eugene H. Takahashi, Deputy Director
Department of Planning and Permitting
City & County of Honolulu
650 S. King Street, 7th Floor
Honolulu, HI 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe District, Oʻahu, Hawaiʻi

Dear Mr. Takahashi:

Thank you for the January 22, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your numbered comments.

1. The Draft Environmental Impact Statement (DEIS) discusses the project's compliance with prevailing City Rules Relating to Water Quality (Title 20, Chapter 3) as part of drainage improvements and the incorporation of various best management practices and low-impact development strategies.
2. The DEIS discusses potential rockfall hazards and includes mitigative measures that have been incorporated into preliminary design plans.
3. The DEIS includes more information on the Cultural Preserve and proposed activities and the conservation easement. Such activities would include cultural practices, restoration of historic sites and landscape, and areas for new native Hawaiian burials following traditional protocols. The conservation easement would restrict any other future development on the 156.5-acre property (less 7.9-acre Ocean View Garden), except for activities and uses within the proposed expansion of the cemetery and Cultural Preserve.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato". The signature is stylized and cursive.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

DEPARTMENT OF TRANSPORTATION SERVICES
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR
HONOLULU, HAWAII 96813

Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

KIRK CALDWELL
MAYOR



WES FRYSTACKI
DIRECTOR

JON Y. NOUCHI
DEPUTY DIRECTOR

TP12/17-713433R

January 17, 2018

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

Dear Mr. Sato:

SUBJECT: Environmental Impact Statement Preparation Notice for Hawaiian Memorial Park Cemetery Expansion Project, Kaneohe, Oahu, Hawaii

This is in response to your notice dated December 19, 2017, requesting our review and comments on the subject project. We have the following comments:

1. **Transportation Impact Assessment (TIA).** The expansion is estimated to attract more visitors to the site for funeral services and customary visitation. A multi-modal TIA should be completed instead of a Traffic Impact Analysis Report. The TIA should calculate and examine the vehicle, pedestrian, bicycle, and public transit stress and comfort levels at the nearby intersections with corresponding improvements to mitigate these impacts by applying Complete Streets principles.
2. **Traffic Management Plan (TMP).** Prepare a TMP which:
 - a. Is jointly reviewed and accepted by the Department of Transportation Services (DTS) and the Department of Planning and Permitting.
 - b. Provides a discussion of the traffic impacts that the project may have on any surrounding City roadways, including short-term impacts during construction and long-term impacts after construction with corresponding measures to mitigate these impacts by applying Complete Streets principles.

- c. Construction materials and equipment should be transferred to and from the project site during off-peak traffic hours (8:30 a.m. to 3:30 p.m.) to minimize any possible disruption to traffic on the local streets.
 - d. Coordinates construction schedules with other nearby properties that have planned developments to ensure minimal impacts on City streets
3. **Complete Streets.** The Application should contain discussion of compliance with County and State Complete Streets policies, pursuant to Act 54, Session Laws of Hawaii 2009, HRS §264-20.5 and ROH 12-15. The Project should elaborate on how it will comply with Complete Streets policies, including specific adherence to the following key Complete Streets principles: safety, Context Sensitive Solutions, accessibility and mobility for all, use and comfort of all users, consistency of design guidelines and standards, energy efficiency, and health and green infrastructure.
 4. **Bike and Moped Parking.** If not already provided, locate on-site bike racks and moped parking at the main building that provides funeral services for employees and visitors to the site.
 5. **Public Transit Service Area.** The project entrance is in an existing public transit service area. To ensure that the project development does not affect public transit services (bus operations, bus routes, bus stops and para-transit operations); submit project plans to DTS - Public Transit Division (PTD) for review and approval. Contact DTS-PTD at 768-8396, 768-8370, 768-8374 or TheBusStop@honolulu.gov.
 6. **Parking.** All parking needs for the proposed facility (employees and visitors) should be handled on-site.
 7. **Vehicle/Pedestrian Crossing.** Any existing pedestrian, bicycle and vehicle access/crossing shall be maintained with the highest safety measures during construction.
 8. **Best Management Practice (BMP) Controls.** BMP controls should be included at the construction site to prevent trailing of dirt and debris on City roadways.

Mr. Ronald A. Sato, AICP
January 17, 2018
Page 3

9. **Roadway Damage.** Any damage to the existing roadway and sidewalk area caused by the project should be repaired to current City standards as well as meet Americans with Disabilities Act (ADA) requirements.
10. **Neighborhood Impacts.** The area Neighborhood Board, as well as the area businesses, emergency personnel (fire, ambulance and police), Oahu Transit Services, Inc. (TheBus and TheHandi-Van), etc., should be kept apprised of the details of the proposed project and the impacts that the project may have on the adjoining local street area network.
11. **Disability and Communication Access Board (DCAB).** Plans should be reviewed and approved by DCAB to ensure full compliance with the ADA.

Thank you for the opportunity to review this matter. Should you have any questions, please contact Renee Yamasaki of my staff at 768-8383.

Very truly yours,



Wes Frysztacki
Director

cc: Scott Derrickson, Department of Business, Economic Development & Tourism

August 22, 2018



Mr. Wes Frysztacki, Director
Department of Transportation Services
City & County of Honolulu
650 S. King Street, 3rd Floor
Honolulu, HI 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Frysztacki:

Thank you for the January 17, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your numbered comments.

1. The expansion of the cemetery would have a minimal change to the number of existing visitors to Hawaiian Memorial Park (HMP). The project would also have negligible, if any, effect on pedestrian accessibility, bicycle accessibility, and public transit that occurs along the State's Kamehameha Highway fronting the HMP entrance. Therefore, the Traffic Impact Analysis Report prepared for this project is appropriate, and discusses existing pedestrian, bicycle, and public transit facilities. The DEIS also addresses these components in more detail.
2. The follow responses address traffic management plan (TMP) comments.
 - a. Because the project site is located well inland from HMP's existing cemetery, no construction work would occur along Kamehameha Highway that would require special duty officers or other traffic control measures. Therefore, construction activities should not negatively impact motorists or pedestrian safety in the vicinity, and should not require a TMP. However, if required, the contractor implementing project improvements would prepare a TMP that would be reviewed and accepted by the Department of Transportation Services (DTS) and the Department of Planning and Permitting.
 - b. The TMP would discuss short- and long-term impacts of the proposed project on surrounding City roadways as well as measures to mitigate these impacts. The project should have minimal short-term construction effects, minimal long-term effects, and negligible effects on complete streets components.
 - c. Large construction equipment and significant materials associated with project construction activities would be transported to and from the site during off-peak traffic hours to minimize disruption to local traffic.

- d. There are no other known developments occurring in the vicinity of the project that would require coordination of construction schedules. However, coordination of construction schedules with nearby developments can be conducted if future conditions change to lessen impacts to City streets.
3. The proposed internal roadway system would be privately owned and is not subject to compliance with the Complete Streets policies discussed, which are applicable to public roadways. However, this private roadway could be utilized for passive recreational activities by the public (i.e. walking or jogging), similar to current public recreational use of existing HMP internal roadways. The DEIS includes a discussion of the project's relationship to the City's Complete Streets policies.
4. Bike and moped parking are currently not provided at the main office building or chapel at HMP, and the cemetery expansion would not require the need to add bike and moped parking at these facilities.
5. The cemetery expansion project would not impact public transit services because it is located well inland from HMP's existing entrance, and no improvements are necessary to existing bus stops. However, design plans would be coordinated with the DTS Public Transit Division for review during the project's design phase.
6. The proposed project will not construct new structural facilities. Employee and visitor parking for existing HMP facilities and the cemetery expansion would be accommodated on site.
7. Existing pedestrian, bicycle, and vehicle accesses/crossings would be maintained during construction of project improvements.
8. Appropriate Best Management Practices (BMPs) to ensure construction related dirt and debris are not transported to City roadways would be implemented. Some BMPs are discussed in the DEIS and final measures would be determined during the design of proposed improvements.
9. Damage to City roadways resulting from project construction would be repaired to current City standards in alignment with Americans with Disabilities Act (ADA) requirements.
10. The Kāne'ohe Neighborhood Board has been engaged throughout the development of the project. This Board along with City emergency responder agencies and the O'ahu Transit Services, Inc. have been apprised of this project as part of this environmental review process.

Mr. Wes Frysztachi, Director
City Department of Transportation Services

Page 3

11. The project does not include the construction of public facilities (e.g. State or City projects, funds, lands) that would be subject to review by the Disability and Communication Access Board.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The signature is fluid and cursive.

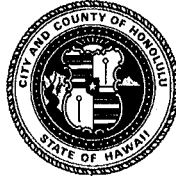
Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

HONOLULU FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU

636 South Street
Honolulu, Hawaii 96813-5007
Phone: 808-723-7139 Fax: 808-723-7111 Internet: www.honolulu.gov/hfd

KIRK CALDWELL
MAYOR



MANUEL P. NEVES
FIRE CHIEF

LIONEL CAMARA JR.
DEPUTY FIRE CHIEF

January 11, 2018

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

Dear Mr. Sato:

Subject: Hawaiian Memorial Park Cemetery Expansion Project
Kaneohe, Hawaii
Tax Map Key: 4-5-033: 001 (Portion)

In response to your letter dated December 19, 2017, regarding the abovementioned subject, the Honolulu Fire Department (HFD) reviewed the material provided and requires that the following be complied with:

1. Fire department access roads shall be provided such that any portion of the facility or any portion of an exterior wall of the first story of the building is located not more than 150 feet from fire department access roads as measured by an approved route around the exterior of the building or facility. (National Fire Protection Association [NFPA] 1; Uniform Fire Code [UFC]TM, 2012 Edition, Sections 18.2.3.2.2 and 18.2.3.2.2.1.)

A fire department access road shall extend to within 50 feet of at least one exterior door that can be opened from the outside and that provides access to the interior of the building. (NFPA 1; UFCTM, 2012 Edition, Section 18.2.3.2.1.)

2. A water supply approved by the county, capable of supplying the required fire flow for fire protection, shall be provided to all premises upon which facilities or buildings, or portions thereof, are hereafter constructed, or moved into or within the county. When any portion of the facility or building is in excess of 150 feet from a water supply on a

Mr. Ronald Sato
Page 2
January 11, 2018

fire apparatus access road, as measured by an approved route around the exterior of the facility or building, on-site fire hydrants and mains capable of supplying the required fire flow shall be provided when required by the AHJ [Authority Having Jurisdiction]. (NFPA 1; UFC™, 2012 Edition, Section 18.3.1, as amended.)

3. The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; UFC™, 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.)
4. Submit civil drawings to the HFD for review and approval.

Should you have questions, please contact Battalion Chief Wayne Masuda of our Fire Prevention Bureau at 723-7151 or wmasuda@honolulu.gov.

Sincerely,



SOCRATES D. BRATAKOS
Assistant Chief

SDB/TC:jl

cc: Scott Derrickson, Land Use Commission
State of Hawaii



August 22, 2018

Mr. Socrates D. Bratakos, Assistant Chief
Honolulu Fire Department
City & County of Honolulu
636 South Street
Honolulu, HI 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Bratakos:

Thank you for the January 11, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your numbered comments.

1. The project does not propose construction of buildings or facilities that would require compliance with uniform fire code building structure or door access distance regulations. However, access roads proposed within the cemetery expansion area would provide access for emergency support vehicles.
2. The project does not propose construction of buildings or facilities that would require access to an approved water supply for fire protection.
3. City fire access road dimensioning requirements (width and vertical clearance) would be incorporated into the design of proposed site improvements, as applicable.
4. Civil engineering drawings developed in the design phase for the proposed project would be coordinated with the Honolulu Fire Department, as appropriate.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

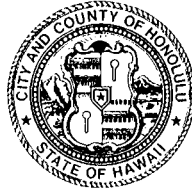
A handwritten signature in black ink, appearing to read "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

POLICE DEPARTMENT
CITY AND COUNTY OF HONOLULU

801 SOUTH BERETANIA STREET · HONOLULU, HAWAII 96813
TELEPHONE: (808) 529-3111 · INTERNET: www.honolulu-pd.org



KIRK CALDWELL
MAYOR

SUSAN BALLARD
CHIEF

JOHN D. MCCARTHY
JONATHAN GREMS
DEPUTY CHIEFS

OUR REFERENCE MT-AL

January 11, 2018

Mr. Ronald A. Sato, AICP
HHF Planners
Pacific Guardian Center
733 Bishop Street, Suite 2590
Honolulu, Hawaii 96813

Dear Mr. Sato:

#1 This is in response to a letter from HHF Planners, dated December 19, 2017, requesting comments on a Draft Environmental Impact Statement, for the Hawaiian Memorial Park Cemetery Expansion project.

The Honolulu Police Department has reviewed this project and has concerns regarding the safe flow of traffic at the project site.

#2 We recommend that the developer evaluate the outcome of the traffic flow affected by the construction vehicles commuting to the project site. We also recommend that the developer provide a traffic mitigation plan to implement traffic controls and management (e.g., flag persons, clear signage and cones, special duty officers, etc.) for construction vehicles driving to and from the work site. These recommendations will ensure a safe means of ingress/egress for construction vehicles, motorists, and pedestrians in the vicinity.

#3 Additionally, the contractor should obtain the necessary street usage permits from the Department of Transportation, State of Hawaii, for the purposes of parking and transporting any construction equipment around the vicinity of the project area.

If there are any questions, please call Major Crizalmer Caraang District 4 (Kailua-Kaneohe-Kahuku) at 723-8639.

Thank you for the opportunity to review this project.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Tsuyemura", is written over a horizontal line.

MARK TSUYEMURA
Management Analyst VI
Office of the Chief

cc: Mr. Scott Derrickson
Land Use Commission



August 22, 2018

Mr. Mark Tsuyemura, Management Analyst
Honolulu Police Department
City & County of Honolulu
801 S. Beretania Street
Honolulu, HI 96813

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe District, Oʻahu, Hawaiʻi

Dear Mr. Tsuyemura:

Thank you for the January 11, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. The Draft Environmental Impact Statement (DEIS) addresses traffic flow at this site, which includes a traffic impact analysis study. Overall, the project would have minimal effect on traffic conditions.
2. The DEIS addresses the impact of construction vehicles traveling to the Petition Area during the project's construction phase on State and City roadways. It is estimated that about 30 to 40 workers could be on the site on a daily basis. This should not have a significant impact on traffic especially since workers would typically arrive before the morning peak hour and leave before the afternoon peak hour. There is sufficient parking within HMP's Ocean View Garden and other cemetery areas to accommodate construction worker vehicles.

Because the project site is located well inland from HMP's existing cemetery, no construction work would occur along Kamehameha Highway that would require special duty officers or other traffic control measures. Therefore, construction worker traffic should not negatively impact motorists or pedestrian safety in the vicinity. If needed, the contractor implementing project improvements would prepare a traffic management plan (TMP) that can discuss traffic controls and management measures to encourage safe travel of construction vehicles to and from the Petition Area.

3. If required, a street usage permit would be obtained by the project contractor should transportation of large construction equipment be expected to impact traffic flow on roadways in the vicinity of the Petition Area. Construction equipment would be stored within the Petition Area or existing HMP property during construction of project improvements.

Mr. Mark Tsuyemura
Honolulu Police Department

Page 2

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The letters are cursive and somewhat stylized.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

January 15, 2018

HHF Planners
733 Bishop St
Honolulu, Hawaii 96813

re: Hawaiian Memorial Park Cemetery Expansion Project

To whom it may concern:

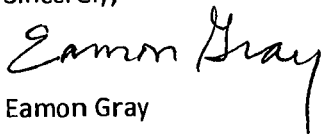
#1 I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISPN) of November 2017. I don't understand why HMP is doing this again to our neighborhood. The only answer is greed. Instead of looking at alternative burial practices they just want more plots to make more money. Ten years ago we told them NO and the LUC told them NO for very significant reasons:

Risks of runoff and erosion
Rockfall hazard to neighborhood
Destruction of the scenic area – the Kaneohe Greenbelt
Adverse water quality of Kaneohe Bay

#2 Now we know that we have an endangered species in the Petition Area. The population of the Blackline Hawaiian Damselfly was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. HMP continues to state that they will mitigate every concern we have with no specifics. How will this endangered species survive their latest proposed project?

#3 Part of our family lot is on conservation land and we are protecting it. Why does HMP have the right to not uphold their responsibilities to the land?

Sincerely,


Eamon Gray

Cc: State of Hawaii Land Use Commission, Dept. of Business, Economic Development & Tourism



August 22, 2018

Mr. Eamon Gray
45-426 Ohāhā Street
Kāneʻohe, HI 96744

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Gray:

Thank you for the January 15, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. The applicant is pursuing this project again, with modifications to the prior concept plans, because there is a need for more burial plots to serve Oʻahu well into the future. Hawaiian Memorial Park (HMP) is an important cemetery serving the needs of residents and memorialization of families that is running out of available burial plots resulting in the need to expand the cemetery. Different burial disposition alternatives, such as cremation or in-ground burials, still require burial plots and the need for cemetery space.

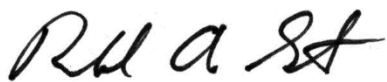
The reasons for the Land Use Commission's prior denial of the petition are being addressed by new technical studies and information included in the Draft Environmental Impact Statement (DEIS). Your specific areas of concern identified are addressed below.

- Runoff and erosion risks will be addressed in the DEIS, which includes a preliminary engineering report and water quality study providing more details. Overall, the project would reduce existing erosion and runoff volumes occurring within the project site due to specific design measures, including detention basins.
- Rockfall hazards associated with the Petition Area have been addressed by a geotechnical study and are discussed in the DEIS. Mitigative measures to address rockfall hazards have been incorporated into preliminary project plans.
- The portion of the Koʻolau Greenbelt applicable to Kāneʻohe encompasses the transition area between the Koʻolau Mountain Range and district valleys and coastal plains. As discussed in the 2017 *Koʻolaupoko Sustainable Communities Plan*, much of this area is presently undeveloped or used for open space purposes. The Petition Area is not located within this transitional area. The project's impact to scenic resources will be assessed and are discussed in the DEIS.

- Water quality of Kāwā Stream would be improved by the proposed project due to reduced runoff volumes and erosion, as discussed in the DEIS. Project improvements would have a beneficial effect on Kāneʻohe Bay’s water quality. A water quality study included in the DEIS discusses these areas in greater detail.
2. An invertebrate survey prepared for this EIS identified the endangered damselfly and the small seep that serves as its habitat. We have determined the species would not be negatively impacted by the project because the seep area would be preserved, and other design measures are proposed to improve the habitat, such as fencing to prevent pigs from impacting that area. The DEIS will include more specific information and details addressing project effects, mitigative measures, and the invertebrate survey report. Therefore, the survival of this species would not be adversely impacted by the project. Furthermore, the applicant plans to coordinate with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program that would support protecting this habitat along with providing educational opportunities.
 3. The applicant is serving as a responsible steward of the Petition Area and natural and cultural resources present. The proposed project was designed with consideration of these resources and includes mitigative measures to minimize impacts. However, there is a need for more burial plots to serve O’ahu residents in the future, and HMP is an important cemetery serving the needs of families.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

January 15, 2018

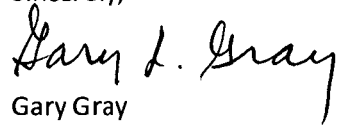
HHF Planners
733 Bishop St
Honolulu, Hawaii 96813

re: Hawaiian Memorial Park Cemetery Expansion Project

To whom it may concern:

- #1 I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISPN) of November 2017. I opposed the HMP project in 2009 and I am still against it even it is a smaller petition area.
- #2 The main reason for my opposition is that the potential for runoff and erosion is still there. We live in the Kawa Stream watershed area and increased runoff and erosion seriously threatens the quality of Kaneohe Bay – which we have been trying to protect and preserve since the 1970's. In addition, I am concerned about rockfall hazards since the grading proposed in the new plan requires even steeper grader than the prior plan. My grandchildren now play in the Mahinui hills as their father did before them. This area was deemed conservation land for a reason – we need to protect our natural resources and preserve what we have left of our natural land.
- #3 Now, we have also learned that a previously unknown population of an endangered species has been discovered in the Petition Area. The population of the Blackline Hawaiian Damselfly was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. The EISPN states, "Technical studies will be conducted for the Draft EIS to address the presence of potential species in greater detail." But how will it be possible to protect such a fragile population with the proposed deforestation and grading in the new plan?
- #4 I live on Ohaha Street which is right below the petition area. I will personally affected by this project but I am even more concerned about the larger issues stated above

Sincerely,


Gary Gray

cc: State of Hawaii Land Use Commission
Dept of Business, Economic Dev. & Tourism

August 22, 2018



Mr. Gary Gray
45-426 Ohāhā Street
Kāneʻohe, HI 96744

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Gray:

Thank you for the January 15, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. We acknowledge your continued opposition to this project, even with a reduced Petition Area.
2. The project's impact to Petition Area drainage conditions, topography, rockfall hazard, and the quality of associated water resources will be assessed in the Draft Environmental Impact Statement (DEIS). The proposed project is designed with consideration of Petition Area natural resources and incorporates mitigative measures to avoid impacting these resources.

Your concerns about potential stormwater runoff and erosion occurring from the project has been addressed by technical studies and information included in the DEIS.

A preliminary engineering report and water quality study will cover these subject areas. Overall, the project would reduce present erosion and runoff volumes occurring within the Petition Area due to project design measures such as detention basins. Consequently, water quality of Kāwā Stream would actually improve with project implementation and these improvements would have a beneficial effect on Kāneʻohe Bay's water quality

Rockfall hazards associated with the Petition Area have been addressed in a geotechnical study and will be analyzed in the DEIS. Mitigative measures to address rockfall hazard have been incorporated into preliminary project plans.

There is a State-owned hillside parcel adjacently north (makai) of the Petitioner's property, and another large privately-owned property further north. These other hillside properties may be used as part of hiking trails. However, the applicant's large Oneawa hillside property, which includes the Petition Area, is privately-owned, and only authorized access is permitted.

The DEIS addresses the project's relation to the existing Conservation District land use classification, and explains why the proposed project is appropriate. The objective of the Conservation District, General Subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature. When created in 1964, those rules allowed many urban uses within the Conservation District, such as residences, recreational facilities, and even commercial uses (e.g. restaurants, hotel). A Conservation Easement proposed for the entire property would ensure no further development would occur beyond what is presently proposed.

3. An invertebrate survey conducted confirmed the endangered damselfly is present within the Petition Area and the small seep that serves as its habitat. The damselfly would not be negatively impacted by the project because the seep would be preserved, and other design measures are proposed to improve the habitat, such as fencing to prevent pigs from impacting that area. The DEIS includes more specific information and details addressing project effects, mitigative measures, and the invertebrate survey report. Therefore, the survival of this species would not be adversely impacted by the project. Furthermore, the applicant plans to coordinate with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program that would protect this species along with providing educational opportunities.
4. We understand your concerns about this project due to your proximity to the Petition Area. However, we believe that proposed design measures, best management practices, and other improvements proposed would address your concerns.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

Hawai'i Construction Alliance

P.O. Box 179441
Honolulu, HI 96817
(808) 348-8885

January 9, 2018

VIA EMAIL

Daniel Orodener
Executive Director, Land Use Commission,
Department of Business, Economic Development & Tourism
P.O. Box 2359
Honolulu, Hawai'i 96804

RE: EISPN for Hawaiian Memorial Park Cemetery Expansion

Dear Mr. Orodener,

- #1** The Hawai'i Construction Alliance is comprised of the Hawai'i Regional Council of Carpenters; the Operative Plasterers' and Cement Masons' Union, Local 630; International Union of Bricklayers & Allied Craftworkers, Local 1; the Laborers' International Union of North America, Local 368; and the Operating Engineers, Local Union No. 3. Together, the member unions of the Hawai'i Construction Alliance represent 15,000 working men and women in the basic crafts of Hawai'i's construction industry.
- #2** We thank you for the opportunity to provide these comments in support of the proposed expansion of the Hawaiian Memorial Park in Kāne'ōhe. We are sure that other commenters will discuss how the expansion will provide local families much-needed options for their loved ones through additional burial, internment, and inurnment spaces. We are also sure that other commenters will address how the planned expansion will include a well-managed cultural preserve and keep much of the property in open space. Therefore, we will limit our comments to the positive impacts the proposed expansion plan will have for the local construction industry.
- #3** We are pleased that the EISPN contains some mention of how the proposed plan will benefit the local construction industry, specifically that "the project would generate some short-term construction related jobs as site preparation and infrastructure improvements are implemented and phased over time" (Page 4-3).

We also appreciate the commitment in the EISPN that "the Draft EIS would address the probable effects in greater detail" (Page 4-3). We hope that this more detailed analysis would include an estimate of how many construction jobs would likely be generated — both direct and indirect — and also the wages associated with those jobs.
- #4** In closing, we look forward to reviewing the Draft and Final EIS documents for this project, and thank you once again for the opportunity to provide comments on this much-needed project.

Sincerely,



Tyler Dos Santos-Tam
Executive Director
Hawai'i Construction Alliance

cc: Mr. Jay Morford, Hawaiian Life Memorial Plan, Ltd.
Mr. Ronald Sato, HHF Planners

August 22, 2018

Mr. Tyler Dos Santos-Tam, Executive Director
Hawai'i Construction Alliance
P.O. Box 179441
Honolulu, HI 96817



SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Dos Santos-Tam:

Thank you for the January 9, 2018 letter emailed to Mr. Daniel Orodener, Executive Director of the State Land Use Commission (LUC) providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. Thank you for the background information on the Hawai'i Construction Alliance, and the diverse membership of workers in the construction industry.
2. The project would provide families with much needed options for the memorialization of family members, and address a significant demand for additional burial plots in the future. Information on the need for this project, proposed improvements, and the proposed Cultural Preserve are discussed in the Draft Environmental Impact Statement (DEIS). We acknowledge and appreciate your letter of support for the proposed project.
3. The DEIS will provide an estimate of the number of construction jobs created and estimated wages generated that would benefit the local construction industry. The DEIS includes more information on construction jobs (direct and indirect) and economic benefits from the project based upon an economic and fiscal study conducted.
4. A copy of the DEIS will be submitted to your organization for review when published.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Ronald A. Sato".

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

45-423 Ohaha Street
Kaneohe, HI 96744

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
Attention: Ronald A. Sato, Senior Associate

Re: Hawaiian Memorial Park Expansion Project

January 20, 2018

Dear Mr. Soto,

I disagree with some of the findings supporting the preparation of Hawaiian Memorial Park's EIS Preparation Notice.

Finding #2 - The expansion of the cemetery would address a growing need for additional burial space:

Cremation rate in Hawaii is one of the highest in the nation. As our society becomes more environmentally conscious, it is imperative to consider more friendly, green alternatives to interment on an island with limited land use. **What alternatives have you considered to be responsible stewards of our land?**

Finding #5 - Substantially affects public health - expansion should not generate significant public health and water quality issues:

The subject of burial practices is shaky since the impact of degradation products from seepage water (from casket wood, steel, concrete vaults, varnishes, sealers and embalmed bodies full of formaldehyde) in cemeteries has not been studied extensively in the United States. **What research have you found to prove that a cemetery in a watershed region is not detrimental to our neighborhood and will not pose a serious threat to our groundwater and drinking supplies?**

Finding #7 - Involves a substantial degradation of environmental quality:

HMP's best management practices of landscape management in the past provided no written management plan or systemic record-keeping guide to verify their practices in the past. **How can we trust that HMP will assume long term responsibilities for proper maintenance?**

Measurements and observations suggested that a significant source of turbidity and Total Suspended Solids in Kawa Stream came from a construction project underway in HMP in 2002. **If this does occur again, how long will it take to flush deposited soil completely out of Kawa stream's system?**

I believe the last TMDL assessment for Kawa Stream was conducted in 2005. **How can we obtain a more current assessment to use as a baseline and ensure that future pollutants will not be discharged into Kawa Stream?**

Finding #10- Detrimentially affect air quality:

Trees reduce temperatures by 10 degrees in their shade and clean pollution from the air, and help to absorb and store CO2. **How will you revegetate the Petition Area to replace the benefits of the existing forest?**

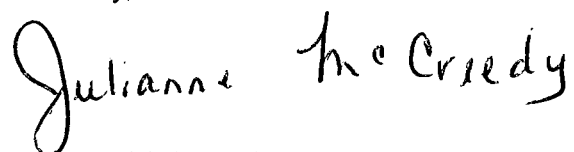
Finding #11 - Affect or is likely to suffer being located in an environmentally sensitive area:

A significant portion of the Petition Area is characterized with slopes that are 20% or greater. The slopes located above residences on Ohaha and Lipalu Streets in the Pikoi'loa Subdivision are 30- 65%. Kaneohe Silty Clay on the slopes of the southwest end has runoff from medium to rapid, erosion hazard is moderate to severe. A Fema Flood Zone Report places this area in Zone D, an undetermined Risk Area. This is an unstudied area where flood hazards are undetermined! **How do you justify having to grade such severe slopes when a more logical solution would be to leave this precious conservation land alone?**

The widespread occurrence of potential mosquito breeding sites in retention areas may be significant thus, increasing the risk of West Nile and Zika viruses. **How do you plan to offset the possibility of mosquito larvae?**

Looking forward to your responses.

Sincerely,

A handwritten signature in black ink that reads "Julianne McCreedy". The signature is written in a cursive, flowing style.

Julianne McCreedy



August 22, 2018

Ms. Julianne McCreedy
45-423 Ohāhā Street
Kāneʻohe, HI 96744

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Ms. McCreedy:

Thank you for the January 20, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We note your disagreement with some of the information from the EISPN, and have provided responses under numbered subheadings corresponding to your comments.

Finding #2: We acknowledge that Hawaiʻi has a high rate of cremation which is primarily due to the large Asian-descendant resident population. However, the primary disposition of deaths are still by cremation or in-ground burial, both of which still require burial plots and the need for cemetery space. The applicant has been, and will continue to be a responsible steward of their property. The Draft Environmental Impact Statement (DEIS) discusses project improvements supporting responsible stewardship efforts. This includes establishing a Cultural Preserve for historic sites and cultural practices, coordinating with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program for endangered damselfly habitat, and establishing a Conservation Easement that would prevent further development beyond that proposed by this project. Alternatives to achieve the purpose and need for the project and the rationale for forgoing these alternatives have been considered and will be addressed in the DEIS.

Finding #5: The project would not have a significant negative impact on public health and water quality, and the DEIS addresses these areas, including technical studies prepared for this EIS. Water quality samples collected and examined showed no significant impact on groundwater from the existing Hawaiian Memorial Park (HMP) and Hawaiʻi State Veterans Cemetery from products such as formaldehyde. The procedures implemented for in-ground burials utilize concrete vaults that prevent fluids from leaching into the ground. Furthermore, cremations presently account for over 70% of burial dispositions, which further reduces the potential for fluid leakage issues. A groundwater study and other information in the DEIS discusses that the Petition Area is not located above an important aquifer for groundwater. Therefore, project improvements do not pose a threat detrimental to groundwater.

Finding #7: HMP has been operated successfully since 1958, and the cemetery's operation has not resulted in substantial degradation of environmental quality. The current landscaping associated with the cemetery is in good condition reflecting the effective management and landscaping practices of HMP and its staff. The condition of the cemetery has contributed to its popularity and desirability by families. Thus, discussing their landscape operations management plan or record keeping is not required to evaluate the cemetery expansion's environmental effects. Furthermore, HMP is audited annually by the State Department of Commerce and Consumer Affairs to ensure they are financially sound to manage and operate the cemetery. After construction, additional maintenance personnel are anticipated to be hired to ensure the cemetery expansion area is properly maintained. The Petitioner has proven to be responsible in the proper maintenance of HMP.

We are not aware of a HMP construction project in 2002 that contributed to turbidity and suspended solids discharged into Kāwā Stream. The Petition Area does presently experience erosion during heavy rainfall that contributes suspended solids (soils) into Kāwā Stream. The DEIS includes a water quality study that documents existing erosion and impacts on Kāwā Stream. Suspended solids are typically transported as part of stormwater runoff and discharged into receiving waters. As runoff subsides and water dries up, these suspended solids could remain in a stream bed. However, such solids would likely be transported and discharged during the next rain event that causes stormwater to flow in the stream.

Total Maximum Daily Load (TMDL) standards for Kāwā Stream were established in 2005 by the State Department of Health. The DEIS includes a water quality study that provides updated information on Kāwā Stream. Future pollutants would continue to be discharged into Kāwā Stream as part of stormwater runoff from adjacent and upland areas. Such pollutants come from erosion of upland areas and from urban development such as existing residences.

Finding #10: Trees do provide some benefits with shade and absorbing carbon dioxide. However, the extensive forest canopy associated with the Petition Area prevents ground cover and other surface vegetation from growing due to reduced sunlight that enhances exposed soils and increased erosion. The DEIS discusses existing erosion occurring from such conditions. The proposed cemetery expansion would be landscaped with turf grass. Vegetation within the Cultural Preserve would remain similar to existing conditions. Although vegetative characteristics of the area would change, the landscaped turf grass would provide beneficial effects by reducing erosion and discharge of debris, and improve storm water infiltration. The loss of the forest canopy would have negligible impact on air quality as surrounding areas of the larger property outside of the Petition Area would remain.

Finding #11: Portions of the Petition Area do have steeper slopes. The characteristics of the Kāne'ōhe Silty Clay found within the Petition Area will be discussed in further detail in the DEIS. Grading improvements to establish topographic conditions appropriate for gravesite development would not have slopes greater than 20%. Proposed grading improvements are based upon geotechnical engineering recommendations and necessary mitigative measures. Preliminary design recommendations are identified in the DEIS. Grading

improvements would reduce existing steeper slopes, reduce runoff velocity, and allow for improved stormwater management of the site.

The flood zone designation for the majority of the Petition Area is Zone D, defined as areas where flood hazards are undetermined, but possible. Smaller areas adjacent to residences are within Zone X designated for areas outside both the 100-year flood and 500-year flood. The DEIS will discuss the project's effect on flooding in more detail.

Detention basins would be designed to include outlets allowing complete drainage within 48 hours when full and within 24 to 36 hours when half full. HMP plans to add additional maintenance personnel for the cemetery expansion area to manage monitoring and properly maintaining detention basins. The Petition Area's existing forest canopy currently provides habitat that supports a large population of mosquitos. Proposed open landscaped lawn would reduce this habitat and levels of mosquito, having a beneficial effect regarding your concern with potential viruses.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

Rich McCreedy
45-423 Ohaha Street
Kaneohe, HI 96744

1-19-18

HHF Planners
733 Bishop Street, Suite 2590
Honolulu, HI 96813
Attention: Ronald A. Sato, Senior Associate

Re: Hawaiian Memorial Park Expansion Project

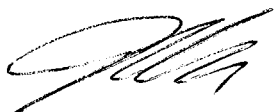
Mr. Ronald A. Sato

- #1 I wish to comment regarding chapter 2.1 of the EISPN that discusses the inventory of the plots being exhausted in the existing 80 acres cemetery. I would like to get more information on the details that support the statement "As of June 2017, HMP has sold over 94% percent of available burial plots, "
1. In the existing cemetery, how many total plots are there?
 2. How many plots have single caskets?
 3. How many plots have two or double depth caskets ?
 4. How many plots have a combination of caskets and cremated remains in urns?
 5. What is the maximum number of cremains the existing cemetery allows per plot?
 6. If a family already owns a plot with one or two caskets interred, how many cremains are allowed per plot?
- #2 In Chapter 2 Project Objectives, I wish to dispute the statement "Without proper planning for the future, Hawai'i residents could easily face a shortage of cemetery space in the near future." Valley of the Temples cemetery in Kaneohe is a 240 acre cemetery and has many acres of available space.
- #3 As a planning and land use policy, the windward side already has enough land devoted to cemeteries. There is Valley of the Temples 240 acres, HMP 80 acres, Greenhaven Memorial Park 6.4 acres, and the State Veterans Cemetery 56 acres. The total acreage for the windward side is 382 acres. If more cemetery space is truly needed, then new developments such as Ho'Opili and Kapolei should include cemeteries in their plans. There are also many acres of suitable former agriculture lands in the center of the island that would be much easier to develop than a steep hillside in Kaneohe.
- #4 The residents of our neighborhood on Ohaha St, Ohaha Place, and Lipalu St directly abut the proposed development. We are concerned about negative impacts from this development, and if it were allowed to proceed, how do we know that HMP will continue to be a viable business that will be able afford to maintain the cemetery and the proposed water run off mitigations. HMP should provide their business plan in the EIS.

#5 Does HMP have enough money in their perpetual care account to maintain the present 80 acre cemetery? Is the proposed expansion necessary to fund their present operations? If this proposed development is allowed to proceed, what happens when they eventually run out of space?

#6 The island of Oahu is already running out of space. We cannot afford to use this valuable hillside for a cemetery for casketed burials in perpetuity. If there is no option to ever use that land more efficiently or for other uses, our society will regret the short sighted choices we make today. We need to adopt more sustainable ways to deal with people at the end of their life.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rich McCreedy', with a stylized, cursive script.

Rich McCreedy



August 22, 2018

Mr. Rich McCreedy
45-423 Ohāhā Street
Kāneʻohe, HI 96744

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. McCreedy:

Thank you for the January 19, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. The Draft Environmental Impact Statement (DEIS) includes information on Hawaiian Memorial Park's (HMP) existing conditions, particularly a market study prepared for this project. Responses to your six numbered questions are provided below.
 - a. There are approximately 79,000 burial plots in the existing HMP cemetery.
 - b. The memorialization of persons within a burial plot is dependent on the desires of the plot owner and family members. Although HMP has a record of persons buried there, the final disposition of the person is not known. Furthermore, detail on the number of existing caskets and urns is not pertinent in establishing that HMP is running out of available burial plots. A burial plot could have up to a maximum of two caskets (in-ground burials).
 - c. Please refer to response No. 1.b.
 - d. Burial plots may contain a combination of one casket, and up to two urns for cremains.
 - e. A burial plot may have up to four urns.
 - f. No urns are allowed within a burial plot that already has two caskets. Up to two urns may be added to a plot that has just a single casket.
2. A market study was conducted for the proposed project (to be included in the DEIS) to assess existing and future market conditions for burial space on Oʻahu. This study demonstrated a strong need for additional burial space on Oʻahu over the next 20 years. Existing and proposed burial spaces at other Oʻahu cemeteries, including the Valley of the Temples cemetery, are considered in this analysis.
3. With regard to planning and land use policy, there is no requirement that places a limit on land available for cemetery use. Land use is based upon several factors such as market conditions and demand, site conditions, climate, and accessibility via transportation systems. The windward district has been a popular choice and for cemetery location, with the Valley of the Temples and HMP/Hawaiʻi State Veterans Cemetery located in the region due to its favorable characteristics.

As with the National Cemetery of the Pacific (Punchbowl), the Hawai'i State Veterans Cemetery is only available for veterans of military service and one other immediate family member (usually a spouse); therefore, the majority of O'ahu's population cannot use that site for family burials. Greenhaven Memorial Park in Kāne'ohe is also full. Furthermore, the proposed cemetery expansion is permitted and designated for such land use by the City's *Ko'olaupoko Sustainable Community Plan*.

More cemetery space is needed for the future as discussed in the DEIS and supported by the market study. Other developments such as Ho'opili and Kapolei could include cemeteries in their plans, but chose not to do so because of other land use priorities, such as residential housing, commercial development, etc. Landowners of agricultural property in central and leeward O'ahu could similarly develop cemeteries if they desired, but choose not to do so. Developing, managing, and operating a cemetery requires unique expertise, experience, and commitment over the long-term because it is not a typical development or business.

4. The project would have some environmental impacts associated with grading improvements within the Petition Area. However, there are sufficient mitigative measures proposed to address concerns with proposed improvements. Other components of the project would improve existing conditions, particularly native Hawaiian cultural practices, endangered species, and stormwater runoff and water quality.

HMP has been operating successfully since 1958 and is a member of the Dignity Memorial Network, an award winning nationwide network of funeral service providers. Given the Petitioner's history of operation and affiliation with the Dignity Memorial Network, HMP would continue to be successfully operated into the future. The DEIS will include pertinent information on the Petitioner's ability to continue operating HMP and the proposed cemetery expansion.

5. HMP is adequately funded to continue maintenance of their cemetery, including the proposed expansion. The cemetery expansion is not necessary to fund existing operations. HMP is audited annually by the State Department of Commerce and Consumer Affairs to ensure they are financially sound to manage and operate the cemetery. The well maintained cemetery is evidence of HMP's successful financial responsibility and management of the property, which has contributed to its popularity and desirability by families. When all burial plots are eventually sold, their perpetual care account would support continued management and maintenance of the cemetery.
6. The island of O'ahu has considerable area to support development and improvements for the future needs of residents. As previously discussed, the DEIS presents the purpose and need for this project to meet the long-term needs of Hawai'i families. The cemetery expansion area would provide both in-ground caskets and memorialization of cremains. The proposed use of the Petition Area reflects a reasonable and efficient use of the property to support an important community need. The primary disposition of deaths are still by cremation or in-ground burial, both of which require burial plots and the need for cemetery space. The applicant has been, and will continue to be a responsible steward of their property.

Mr. Rich McCreedy

Page 3

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The letters are cursive and somewhat stylized.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

January 15, 2018

HHF Planners
733 Bishop St
Honolulu, Hawaii 96813

re: Hawaiian Memorial Park Cemetery Expansion Project

To whom it may concern:

#1 I am writing this letter to submit my concerns in response to the Environmental Impact Statement Preparation Notice (EISPN) of November 2017. I also submitted my concerns regarding the original Environmental Impact Statement almost 10 years ago and find it very disheartening that your company would continue to pursue changing the zoning in our neighborhood when we clearly expressed our opposition to any development in the conservation area. While the scope of your proposed development has been minimized the same issues remain. These issues were acknowledged by the Land Use Commission in 2009 when they denied your initial request:

Risks of runoff and erosion – “for Kaneohe Silty Clay, runoff is medium to rapid and the erosion hazard is moderate to severe.”

Rockfall hazard to neighborhood – the grading proposed in new plan requires steeper grading than the prior plan.

Destroy the scenic area - the Ko’olau Greenbelt would still be negatively impacted.

Adverse water quality of Kaneohe Bay – development of the Petition Area would still result in the removal of the secondary forest and a change to both runoff and chemical loads exiting the Kawa Stream watershed.

#2 Additionally, since the original EIS, was written, a previously unknown population of an endangered species has been discovered in the Petition Area. The population of the Blackline Hawaiian Damselfly was confirmed by the State DLNR, Division of Forestry and Wildlife and the US Fish and Wildlife Service. The EISPN states, “Technical studies will be conducted for the Draft EIS to address the presence of potential species in greater detail.” No reference is made to proposed protections which would be absolutely necessary given the location of the one identified population and the deforestation and gradation processes involved in the project.

#3 A fourth generation of my family is now living in our home on Ohaha Street which is adjacent to the petition area. My parents bought this house with the understanding that part of our lot and the surrounding area was conservation land. We wanted it that way then and we want it that way forever. We must protect our natural resources.

Sincerely,



Kathleen O'Malley

CC: State of Hawaii Land Use Commission
Dept. of Business, Economic Dev. & Tourism

August 22, 2018



Ms. Kathleen A. O'Malley
45-426 Ohāhā Street
Kāneʻohe, HI 96744

SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Ms. O'Malley:

Thank you for the January 15, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. We acknowledge your continued concerns about this project, even with the smaller Petition Area. The applicant is pursuing this project with modifications to prior plans, because there is a need for more burial plots to serve Oʻahu well into the future. Hawaiian Memorial Park (HMP) serves the needs of residents and memorialization of families. Because HMP is running out of available burial plots, there is an urgent need to expand the cemetery. Different burial disposition alternatives, such as cremation or in-ground burials, still require burial plots and the need for cemetery space.

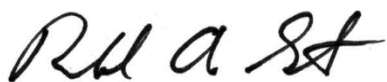
The reasons for the Land Use Commission's prior denial are being addressed by technical studies and information included in the Draft Environmental Impact Statement (DEIS). Your specific areas of concern are addressed below.

- Runoff and erosion risks will be addressed in the DEIS, including a preliminary engineering report and water quality study. Overall, the project would reduce erosion and runoff volumes occurring within the project site due to proposed design measures included such as detention basins. Description and characteristics of the Kāneʻohe Silty Clay will be discussed in the DEIS.
- Rockfall hazards associated with the Petition Area have been addressed by a geotechnical study and will be discussed in the DEIS. Mitigative measures for rockfall hazards have been incorporated into preliminary project plans. Proposed grading improvements will establish topographic conditions appropriate for gravesite development, and would not have slopes greater than 20%. Grading improvements would reduce slopes, reduce stormwater runoff velocity, and allow for improved stormwater management of the site.
- The portion of the Koʻolau Greenbelt applicable to Kāneʻohe encompasses the transition area between the Koʻolau Mountain Range and district valleys and coastal plains. As discussed in the 2017 *Koʻolaupoko Sustainable Communities Plan*, much of this area is presently undeveloped or used for open space purposes. The Petition Area is not located

- within this transitional area. The project's impact to scenic resources have been assessed and will be discussed in the DEIS.
- Water quality of Kāwā Stream would be improved by the proposed project due to design measures included in project plans, such as detention basins. Runoff volumes and current erosion would also be reduced, with a beneficial effect on Kāne'ōhe Bay's water quality. A water quality study to be included in the DEIS discusses these subjects in greater detail. Although vegetative characteristics of the canopy forest area would change, the landscaped turf grass would provide beneficial effects by reducing erosion and discharges of debris, and improve infiltration of stormwater runoff. The extensive forest canopy associated with the Petition Area reduces ground cover from growing due to reduced sunlight. Reduced groundcover contributes to exposed soils and increased erosion.
2. An invertebrate survey prepared for this EIS identified the endangered damselfly and the small seep that serves as its habitat. This species would not be negatively impacted by the project because the seep would be preserved, and other design measures are proposed to improve the habitat, such as fencing to prevent feral pigs from impacting that area. The DEIS will include more specific information and details addressing project effects, mitigative measures, and the invertebrate survey report. Therefore, the survival of this species would not be adversely impacted by the project. Furthermore, the applicant plans to coordinate with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program for this damselfly habitat that would protect this species along with providing educational opportunities.
 3. The Applicant was not involved or associated with the circumstances in the purchase of your home. As homeowners are entitled to use their property to serve their needs, other property owners similarly have the right to use their property. The Applicant is serving as a responsible steward of the Petition Area and natural and cultural resources. The proposed project is designed with consideration of these resources and includes mitigative measures to minimize impacts. There is a need for more burial space to serve O'ahu and its families in the future.

Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,



Ronald A. Sato, AICP

Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd.

January 22, 2018

Nathan Yuen
91-233 Hanapouli Cir #29T
Ewa Beach, Hawaii 96706
Email: 808nateyuen@gmail.com

HHF Planners
733 Bishop Street #2590
Honolulu, HI 96813

Ronald A. Sato, AICP, Senior Associate
email: rsato@hhf.com
457-3172

With a copy to:

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

Project: Docket Number: A17-804
Hawaiian Memorial Park Cemetery Project
Kane'ohe District, O'ahu, Hawaii
(1) 4-5-033: por.001 (Private Property)

Dear Sir or Madam:

#1 I am responding to the Environmental Impact Statement Preparation Notice by Hawaiian Memorial Park.

I work as an accountant for an engineering consulting firm during the week but on the weekends I become an amateur naturalist, hiker, and photographer. For the past 20 years I have been venturing to remote parts of our islands to photograph the native plants and animals of the Hawaiian Islands many of which are rare or endangered. I have a blog – HawaiianForest.Com – which documents some of the rarest species on the planet.

I served as a commissioner for the State of Hawaii's Natural Area Reserves System (NARS) Commission administered by the Department of Land and Natural Resources from 2013 to 2017. I currently serve as Conservation Chair for the Sierra Club of Hawaii Executive Committee. I am also a member of the Hawaiian Entomological Society.

#2 In this matter, I am acting on my personal behalf as a private citizen. I was involved in the initial discovery and confirmation of the population of Blackline Hawaiian Damselflies — *Megalagrion nigrohamatum nigrolineatum* – on conservation land owned by Hawaiian Memorial Park.

My friend Patrick Shea was a candidate for State House of Representatives District 49 in the 2016 election. In June 2016, Patrick met Liam Gray while canvassing the homes on Ohaha Street. Liam told Patrick that he discovered a previously unknown population of endangered Blackline Hawaiian Damselflies in the backyard of Ernest and Bettye Harris on Ohaha Place who live adjacent to the land owned by Hawaiian Memorial Park. Patrick asked whether I could confirm the find and made arrangements for Liam to take us to the site.

On June 26, 2016, Liam Gray took me and several windward residents – Patrick Shea, Grant Yoshimori, Caitlyn Yoshimori, Rich McCreedy, and Julie McCreedy – to see the endangered damselflies. I was surprised to see these damselflies in Kāneʻohe. I had previously only seen this species of damselflies in native forests and streams above 2,000 feet elevation in the Koʻolau Mountain. I did not expect to see them at this low elevation in Kāneʻohe under alien trees – schefflera, albezia, strawberry guava, and other non-native vegetation.

#3 The Pukui/ Elbert Hawaiian dictionary has an intriguing entry for this damselfly — pinapinao ānuenuenu — the rainbow-eye damselfly.



This is the most common morph for males — it has big round eyes that are red, green, and yellow, a orange-yellow-black thorax, and a segmented abdomen with a red tip.

I have taken many photos of these damselflies at the low elevation site in Kāneʻohe. There are multiple morphs (color patterns) for both male and female damselflies. One of the morphs has a

three colored-eye. The name pinapinao ānuenuē — the rainbow-eye damselfly – is appropriate for this colorful insect.



This is the most common female morph – the eyes are red on top and blue on the bottom.

#4 I contacted Hawaiian damselfly expert Dan Polhemus at the US Fish & Wildlife Service and brought him to the site. He did the research to get this and several other damselfly species listed as endangered species. Dan Polhemus confirmed that this was a previously unknown population of Blackline Hawaiian Damselflies — *Megalagrion nigrohamatum nigrolineatum*. Dan was also surprised to see these damselflies at this low elevation. He said that this species is endemic only to O‘ahu and once inhabited the streams and wetlands throughout the island at all elevations. But they are rare today with less than 1,000 estimated to remain.

Blackline Hawaiian Damselflies are on the federal list of endangered species. Loss of habitat and predation by invasive species are the biggest reasons for their decline. Today they are found at high elevations in the Ko‘olau Mountains except for this population in Kāne‘ohe. For some reason this population managed to survive at low elevation.

#5 This population of damselflies exists because of a seep – a small fresh water spring – that trickles down a shallow ravine and creates a miniature wetland where they breed. This habitat is crucial to the survival of this remnant population of low-elevation rainbow-eye damselflies. If the habitat is destroyed or otherwise adversely affected, this population of damselflies will likely cease to exist.



A rival male darts in to interrupt a pair of mating rainbow-eye damselflies.

#6 The proposed cemetery expansion is likely to adversely affect this population of damselflies. It is my understanding that Hawaiian Memorial Park is required to develop a habitat conservation plan to protect these endangered insects. The plan would need to address several issues important to the continuation of this unique population of damselflies.

Of greatest concern is that the proposed cemetery expansion could disrupt the ground water hydrology of the area and cause the seep to stop flowing. The damselfly population cannot survive without water flowing in their habitat.

#7 Another big concern is run-off from the construction or operation of the expanded cemetery could destroy the habitat or introduce fertilizers/pesticides that harm the damselflies. Also studies have shown that the decomposition of human bodies could introduce arsenic and other toxins into the ground water adversely affecting water quality in the seep.

#8 It is also important to establish a sufficient buffer between the expanded cemetery and the damselfly habitat so they continue to exist and breed at the seep without disruption and interference by humans.



After the female is fertilized the pair fly to water where she curls her abdomen and lays eggs in the seep.

- #9 The discovery of this previously unknown population of low elevation Blackline Hawaiian Damselflies in Kāneʻohe is a remarkable and significant find. Rainbow damselflies are an endangered species found only on Oʻahu and are unique to the natural history and heritage of Kāneʻohe. The low elevation habitat for these damselflies needs to be protected to ensure their survival into the future.
- #10 Thank you for this opportunity to protect these damselflies. I would appreciate being placed on your distribution list so I can participate in this proceeding through the various stages of the process.

Sincerely,

A handwritten signature in black ink that reads "Nathan Yuen".

Nathan Yuen

August 22, 2018

Mr. Nathan Yuen
91-233 Hanapouli Cir #29T
Ewa Beach, Hawai'i 96706



SUBJECT: Hawaiian Memorial Park Cemetery Expansion Project
Environmental Impact Statement Preparation Notice (EISPN)
TMK: (1) 4-5-033: por. 001 (Private Property)
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Yuen:

Thank you for the January 22, 2018 letter providing comments on the Environmental Impact Statement Preparation Notice (EISPN) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. Thank you for sharing your background, involvement with community organizations, blog, and interest with rare and endangered plants and animals.
2. We confirm your comment letter is being written as a private citizen commenting on this project, and acknowledge your discovery and confirmation of a population of endangered Blackline Hawaiian Damselflies within the Petition Area associated with the Memorial Park (HMP) property. However, it should be noted that the HMP property is privately-owned, and trespassing is not permitted. Only persons with authorized access granted by the Petitioner are permitted onto this property. Our understanding is that such authorization was never requested or provided by the Petitioner.

We note your discussions with Ohaha Street and Ohaha Place residents identified regarding the endangered damselfly. It appears those residents took you on to the Petitioner's property, without prior landowner authorization and notification, to view these damselflies. The tree types noted in your description are within the Petitioner's HMP property and not within other private residences.

3. We appreciate your photos and information provided on the Blackline Hawaiian damselfly population.
4. We note that you contacted the U.S. Fish and Wildlife Service about the endangered damselfly and brought the person onto the privately-owned HMP site. Again, our understanding is that authorization for access was not requested or granted by the Petitioner. We appreciate the information describing the damselfly.

5. The damselfly habitat does consist of a seep within the Petitioner's property that flows and drains into a City drainage catch basin bordering an adjacent residence. However, the seep does not create a miniature wetland. A botanical study conducted for the Petition Area did not identify this area as being a wetland. We concur that this seep habitat is important for the survival of this damselfly population.

6. An invertebrate survey prepared for the DEIS identified the endangered damselfly and the small seep that serves as its habitat. The DEIS will also include information and studies related to groundwater hydrology, drainage conditions, and water quality. The damselfly habitat would not be impacted by the proposed project because that seep area would be preserved, and design measures are proposed to protect the habitat, such as fencing to prevent access for feral pigs. The DEIS includes more specific information and details addressing project effects, mitigative measures, and also includes the invertebrate survey report. Therefore, the survival of this species would not be adversely impacted by the project.

A habitat conservation plan is not required for this habitat. Furthermore, the applicant plans to coordinate with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program for this habitat that would support protection of this species and provide educational opportunities.

7. Runoff from construction activities would be mitigated by best management practices, which will include detention basins. The seep is located within an existing drainageway that eventually discharges into a nearby City catch basin. Stormwater runoff currently discharges through this area, particularly during heavier storms. Proposed grading plans would direct stormwater runoff away from the seep site using retaining walls and detention basins. Therefore, fertilizers and herbicides should not adversely affect this site or the damselflies.

Water quality samples collected and examined showed no significant impact on groundwater from the existing Hawaiian Memorial Park (HMP) and Hawai'i State Veterans Cemetery from chemicals such as formaldehyde. A groundwater study and other information in the DEIS describes that the Petition Area is not located above an important groundwater aquifer. Therefore, project improvements would not pose a threat or be detrimental to groundwater.

8. A sufficient buffer would be established around the seep habitat that would include fencing to restrict access for feral pigs. Cemetery expansion areas would be located away from the seep area. Physical intrusion from cemetery visitors is not expected.

9. Coordination with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program would support species protection and educational opportunities.

10. Thank you for providing us with your comments on the EISPN. We will add you to the distribution list of the DEIS when it is published for review.

Mr. Nathan Yuen

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Thank you for providing us with your comments on the EISPN and participating in this process. If you have any questions, please contact me at 457-3172 or rsato@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "R A Sato". The letters are cursive and somewhat stylized.

Ronald A. Sato, AICP
Sr. Associate

cc: Mr. Jay Morford, Hawaiian Memorial Life Plan, Ltd