

# APPENDIX **A-2**

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*Draft Environmental Impact Statement  
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-0435

October 23, 2018

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

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

Dear Mr. Sato:

The U.S. Fish and Wildlife Service (Service) received your letter on September 6, 2018, requesting our comments on the Draft Environmental Impact Statement (DEIS) for 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]. This letter has been prepared under the authority of and in accordance with the Endangered Species Act of 1973 (ESA), as amended (16 U.S.C. 1531 *et seq.*), and other authorities mandating Service concern for environmental values.

## Project Description

Hawaiian Memorial Life Plan, Ltd. (Petitioner) owns and manages the Hawaiian Memorial Park (HMP), a full service cemetery that provides the community with burial plots and a variety of interment options. The Petitioner is proposing to expand HMP because of growth in O'ahu's aging population and demand for ground interment and inurnment spaces. Currently, less than 6% of individual plots at HMP are available for families. Therefore, the Petitioner is asking the State of Hawai'i (State), Land Use Commission (LUC) to reclassify a portion (53.45 acres) of their larger 164.4 acre property from the State Conservation District to the Urban District, allowing for the expansion of the cemetery to meet future burial plot needs. This expansion project is referred to as the Hawaiian Memorial Park Cemetery Expansion Project ("Project" or "Proposed Action"). The property the Petitioner intends to reclassify is referred to as the "Petition Area."

The Proposed Action consists of two components: 1) expansion of the HMP cemetery to include 28.2 acres of new cemetery space; and 2) creation of a 14.5-acre cultural preserve immediately northeast of the cemetery expansion area. Remaining portions of the larger 164.4 acre property surrounding the Petition Area would remain undeveloped. A conservation easement with the Hawaiian Islands Land Trust would be placed on 156.5 acres of the larger parcel (less HMP's 7.9-acre Ocean View Garden section), restricting future development of the property except for

execution of the Proposed Action.

### **Service Comments**

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. The federally endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) may occur and also be impacted by components of the Proposed Action. Therefore, we appreciate your proposed avoidance and minimization measures for the Hawaiian hoary bat. Please note our comment letter dated February 5, 2018 for specific dates to avoid disturbance during the bat breeding and pupping season. Additionally, the federally endangered blackline Hawaiian damselfly (*Megalagrion nigrohamatum nigrolineatum*) has been documented on the HMP property and may be impacted by components of the Proposed Action. We offer the following comments to assist you in your proposed project.

#### Blackline Hawaiian damselfly

The blackline Hawaiian damselfly occurs in the slow sections or pools along mid-reach and headwater sections of perennial upland streams and in seep-fed pools along overflow channels bordering such streams. All colonies of the blackline Hawaiian damselfly are constrained to portions of streams not occupied by nonnative predatory fish—that is, stream portions above geologic or manmade barriers (e.g., waterfalls, steep gradients, dry stream midreaches, or constructed diversions).

Blackline Hawaiian damselfly adults are predacious and feed on small flying insects, such as midges; immatures require pools until their adult 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. Changes to the hydrology within this site or upstream have the potential to threaten the habitat currently used by the blackline Hawaiian damselfly.

In general, the Service finds that the DEIS underestimates or fails to adequately analyze certain risks to the habitat supporting a local population of the blackline Hawaiian damselfly inherent in the development of the Petition Area for a cemetery expansion. In particular, the Service's concerns center on impacts to hydrology and spring discharge, and on water-borne or wind-borne

transport of environmental contaminants, in the form of landscaping chemicals or their residues, into the damselfly habitat. The Service also notes that additional discussion is encouraged in regard to potential coordination with its Partners for Fish and Wildlife Program. We recommend a revised EIS be prepared that addresses these deficiencies.

### *Hydrology*

On Page 2-24, the DEIS states that “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...”

To reconfigure the site into topography suitable for a cemetery, the existing steep slopes within the Petition Area would need to be extensively altered. As explained on Page 2-25 of the DEIS “In order to achieve the desired finish grades, the lower flank slopes of the Oneawa hillside on the western end of the site would need to be cut... The majority of the hillside on the western end of the expansion site would be excavated reducing it up to 40 feet in height; however, the areas near the top of the hillside would reduce it up to 100 feet in height. A smaller ridge line below this hillside in the area generally between Lipalu Street and Ohaha Place would also be excavated. Excavations would extend up to 60 feet for this smaller ridge.”

The DEIS further states that “The excess soil from excavation activities would be used to fill the lower portions of the basin areas within the cemetery expansion site... these areas proposed for fill generally include areas below the current hillside, and the majority of the eastern half of the cemetery expansion site. The majority of fill activities would increase the existing height of the basin less than 20 feet; however, a section would fill up to 40 feet in height.”

In addition to grading and filling, construction of large retaining walls are also proposed. On Page 2-25 the DEIS notes that “The roadways alignment and earthwork balance requirements under the preliminary grading plan necessitate the need for constructed retaining walls at various locations within the cemetery site. A total of seven retaining walls (labelled Walls A to G) are planned... These retaining walls would be utilized within the central and western areas of the Petition Area, and most are associated with the excavation of the hillside. The keystone designed retaining walls would average about 10 feet in height, with some sections having a maximum height of 25 feet due to terrain. The use of walls taller than 10 feet tall is planned to be kept to a minimum. However, where taller wall sections are required, the keystone would be terraced to provide for a more aesthetic view complete with landscaping.”

The Service notes that much of the proposed terrain reconfiguration would occur at the western end of the Petition Area, which lies immediately upslope of the habitat supporting the population of the ESA-listed blackline Hawaiian damselfly. As such, any impacts of such activities to the local hydrology feeding the spring at the site would be immediately detrimental to the integrity and potential long-term survival of this population. On Page 3-64 of the DEIS, it is explained

that a consultant was hired to assess the nature of groundwater flows in this area. It states “Two types of field investigation were undertaken to assess whether the well and seep are from a shallow perched water source. This investigation consisted of: 1) drilling four boreholes directly upslope of the well and seep; and 2) conducting a siphon and pump test of the well to determine if subsurface leakage from the well is creating the seep that emerges just four feet downslope.” The studies concluded that “the seep is maintained by the natural discharge of groundwater moving downslope through the poorly permeable residual soils overlying the unweathered Kailua volcanics. In the vicinity of the well and four test boreholes upslope from the well, the groundwater is actually semi-confined. The groundwater movement is through underlying soils at depths of 10 feet or more rather than through the surface soils.”

On subsequent pages, the DEIS does not seem to be internally consistent in its conclusions regarding potential construction impacts to this groundwater flow supporting the blackline Hawaiian damselfly habitat. On page 3-66 the DEIS states that “Based on these tests, it was determined that grading improvements should not have a significant impact on the Petition Area’s underlying groundwater conditions or the well and seep.” However, on page 3-67 the DEIS states that “The weight of the fill material has the potential to compress existing soils and interrupt or redirect groundwater migration that is moving downslope. This could reduce the permeability of these already poorly permeable soils, impeding or re-routing the downslope direction of groundwater flow.” These two statements appear to be at odds with each other, one asserting no impacts, the other admitting that impacts might well occur. We believe that impacts have a reasonable likelihood of occurring, due to both excavation into slopes above the spring habitat that may penetrate bedrock, and soil compaction impacts, as described above.

Furthermore, on Page 2-30, it is observed that, “Excavation work may encounter stiff to hard residual and saprolitic soils and the underlying basalt rock formation. In addition, some of the excavations may encounter boulders, clusters of cobbles, and hard basalt rock formation. It is anticipated that most of the materials may be excavated using normal heavy excavation equipment. However, deep excavations, boulder excavations, and excavations into the underlying basalt rock formation may require the use of hoe rams.” This seems to be a direct acknowledgement that excavation activities associated with terrain reconfiguration could indeed penetrate the entire overlying soil horizon and into the underlying basalt bedrock, which would have the potential to impact the groundwater flow at levels below the surface soils. As discussed previously, the DEIS indicates that the most extensive excavation of this type will occur at the western end of the Petition Area, directly above the damselfly habitat. No mention is made of how such excavation impacts might be mitigated.

The proposed solution to the soil compaction issue presented in the DEIS is to install deeper subsurface drains to route groundwater flow, but it is not specified how far below the existing surface such drains would need to be. If they were deep enough to penetrate whatever underlying aquifer is feeding the present spring (10 feet or deeper, according to the information in the DEIS) and served to change the direction of subsurface groundwater flow, then they themselves could represent potential impacts to the damselfly population.

The Service also has concerns about the proposed mitigation measures related to the spring habitat. On Page 3-56, one of the measures proposed to minimize potential effects on the

damselfly population is to “Conduct regular inspection of the seep to ensure the present low trickle flow of water is continued.” However, the DEIS does not also describe what the response would be if the water flow is observed to be declining, or ceases. This possible scenario could result in significant habitat modification or degradation that results in death or injury to the blackline Hawaiian damselfly by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.

In summary, the DEIS fails to document how groundwater inputs are currently arriving at the current spring head, fails to analyze how the proposed grading, filling and road or retaining wall construction may alter the flow, or how an interruption in such flow would be addressed. If the flow is interrupted, this could have significant impacts to the listed damselfly by leading to partial or complete loss of spring-fed habitat. The Service therefore recommends that a revised EIS also evaluate an alternative under which no significant grading, excavation or construction would occur on any of the slopes above the spring along the plausible flow path of the source groundwater, this area being roughly equivalent to that lying southwest of the line labelled “Site Section A” in the DEIS Figure 2.4. Under such an alternative, significant development and ground disruption would be limited to the areas east of the spring, with access obtained by using existing road grades left over from the former dairy farming operation in the area to the best extent possible.

#### *Environmental contaminants*

On Page 3-87, the DEIS states that “Herbicide, and to a lesser extent pesticide, usage may occur as a result of landscaping maintenance activities associated with cemetery expansion area.” It is further stated that “With the extensive grading improvement planned at the site, the trace concentrations of pesticides such as Diuron detected that may be potentially located in alluvial deposits adjacent to drainage ways may become buried within fill material or removed as part of excess material from cutting activities. These pesticides may still be present within the Petition Area from its prior historic use for agriculture and ranching activities.”

Cemeteries are intensively managed landscapes, and as such make use of a wide array of landscape maintenance chemicals including herbicides, pesticides, and fertilizers. The DEIS acknowledges that such chemicals will be used in the future within the proposed project footprint, and that some residues are already present in or adjacent to the proposed project area. Although the DEIS takes into account the potential delivery of such chemicals into the main Kāwā Stream channel in the context of a Clean Water Act Section 303(d) assessment of Total Maximum Daily Load (TMDL), it does not assess the potential for more local transport of such chemicals downslope from the proposed new cemetery development into the spring head and outflow area at levels below TMDL via shallow groundwater percolation or sheet flow during heavy rainstorms. It would seem likely that at least some level of contamination would inevitably be transported immediately downhill into the habitat currently occupied by the damselfly. Peer-reviewed research has demonstrated that aquatic insects such as damselflies are particularly vulnerable to lethal and sub-lethal effects when exposed to pollutants, such as pyrethrin-based pesticides and other chemicals that may be used in landscaping maintenance. The revised EIS should therefore analyze this possibility in greater detail. Consistent with the hydrology concerns stated above, the Service recommends that the revised EIS also evaluate an alternative under which no landscaped areas of any sort would be created on any of the slopes draining into the

damsselfly habitat; this area again being roughly equivalent to the portion of the parcel lying southwest of the line labelled "Site Section A" in the DEIS Figure 2.4.

The Service also notes that the majority of the area proposed for cemetery development lies east of the damsselfly habitat. As such, it does not present the same risks from direct runoff of landscaping chemicals or residues, but it is directly upwind of the spring habitat under normally prevailing tradewind conditions, and the potential thus exists for airborne drift of pesticides into the spring area, which could affect damsselfly adults, as well as settle into the spring water, thus exposing earlier life stages to toxic effects. The revised EIS should therefore assess this risk also and indicate how it might best be mitigated.

### *Partnership*

On Page ES-7, the DEIS states that in regard to the damsselfly habitat "Coordination would be conducted with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program for this damsselfly's habitat under the Partners for Fish and Wildlife program." The Service acknowledges that some initial conceptual discussions have occurred, and the DEIS does mention certain mitigating measures, including construction of fencing around the damsselfly habitat, monitoring for invasive aquatic species, and providing molting perches in aquatic areas away from introduced ants, all of which would be useful and beneficial components of such a habitat restoration and conservation plan. However, we still have concerns for the potential impacts resulting from the proposed changes in hydrology upslope and the environmental contaminants on the damsselfly and its habitat. Lastly, no substantive progress towards a Partners for Fish and Wildlife conservation project has been made to date in regard to an actual proposal detailing specific activities, timeline or budget. Therefore, we recommend that a timeline should be provided in the revised EIS in regard to how coordination on this matter will proceed.

Although we encourage continued coordination with the Partners for Fish and Wildlife program in order to establish a habitat restoration and conservation program for the damsselfly's habitat, please note that the successful development of a habitat restoration plan may not necessarily relieve the project proponent from the need to comply with the ESA. If the final proposed action still includes potential changes in the hydrology or use of landscaping chemicals that may result in take of the endangered blackline Hawaiian damsselfly, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance. If no Federal agency is involved with the proposed project, we recommend the Petitioner request an incidental take permit under section 10(a)(1)(B) of the ESA. The section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats, and defines measures to minimize and mitigate those adverse effects.

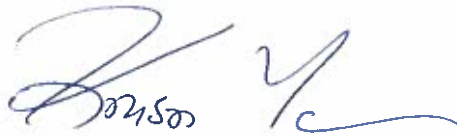
### **Summary**

In summary, we recommend that the revised EIS address in more detail the potential threats to the local population of blackline Hawaiian damsselfly specifically in regard to hydrology and environmental contaminants, and also analyze an alternative under which no cemetery development or major land disturbance would occur on any slopes directly above or draining into the damsselfly habitat. The Service also encourages the Petitioner to engage at their earliest

opportunity with the Partners for Fish and Wildlife Program, and for the revised EIS to provide a timeline for implementation of such a partnership and its associated mitigation activities. If incidental take of the blackline Hawaiian damselfly cannot be avoided, we also recommend the Petitioner request an incidental take permit under section 10(a)(1)(B) of the ESA.

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](mailto:Jiny_Kim@fws.gov)) and Dr. Dan A. Polhemus, Aquatic Ecosystem Conservation Program Manager (email: [Dan\\_Polhemus@fws.gov](mailto:Dan_Polhemus@fws.gov)). When referring to this project, please include this reference number: 01EPIF00-2018-TA-0435.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kristi Young', with a stylized flourish extending to the right.

Kristi Young  
Deputy Field Supervisor, Programmatic  
Operations

cc:

Mr. Scott Derrickson – State of Hawai'i, Land Use Commission

Ms. Cynthia King – State of Hawai'i, Department of Land and Natural Resources – Division of Forestry & Wildlife







March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Nadig:

Thank you for the October 23, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (italicized).

**Service Comments**

- We have reviewed the information you provided and pertinent information in our files, including data compiled by the Hawaii Biodiversity and Mapping Program as it pertains to listed species and designated critical habitat. The federally endangered Hawaiian hoary bat (*Lasiurus cinereus semotus*) may occur and also be impacted by components of the Proposed Action. Therefore, we appreciate your proposed avoidance and minimization measures for the Hawaiian hoary bat. Please note our comment letter dated February 5, 2018 for specific dates to avoid disturbance during the bat breeding and pupping season.*

Response: We acknowledge your concurrence with measures discussed in the Draft EIS to avoid or minimize project impacts on Hawaiian hoary bat that may be found in the Petition Area. We note your prior comment letter identifying specific dates to avoid disturbance from June 1<sup>st</sup> to September 15<sup>th</sup> that was discussed in Section 3.4.2.
- Additionally, the federally endangered blackline Hawaiian damselfly (*Megalagrion nigrohamatum nigrolineatum*) has been documented on the HMP property and may be impacted by components of the Proposed Action. We offer the following comments to assist you in your proposed project.*

Response: We concur that federally endangered blackline Hawaiian damselfly has been documented within a small confined area of the Petition Area. We have provided responses below to your specific comments on this species.

### **Blackline Hawaiian Damselfly**

1. *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. Changes to the hydrology within this site or upstream have the potential to threaten the habitat currently used by the blackline Hawaiian damselfly.*

Response: We agree that significantly changing the water flow of this seep may affect the damselfly and its habitat. Consequently, several measures have been incorporated into the project design to avoid impacting the seep. The area surrounding the seep would be preserved and various design measures discussed in Section 2.2.2 of the DEIS would ensure subsurface water would continue to flow to the seep. The study results from various experts (e.g. groundwater engineer, entomologist, geotechnical engineer) have combined to provide a comprehensive understanding of this damselfly habitat discussed in Section 3.5, and allow for design measures to be incorporated into project plans to avoid affecting this species.

2. *In general, the Service finds that the DEIS underestimates or fails to adequately analyze certain risks to the habitat supporting a local population of the blackline Hawaiian damselfly inherent in the development of the Petition Area for a cemetery expansion. In particular, the Service's concerns center on impacts to hydrology and spring discharge, and on water-borne or wind-borne transport of environmental contaminants, in the form of landscaping chemicals or their residues, into the damselfly habitat.*

Response: We disagree with the Service's assertion that the DEIS underestimates or fails to adequately analyze certain risks to the habitat supporting the damselfly. Section 3.6 addresses groundwater resources that includes a technical study conducted by Tom Nance Water Resource Engineering, a firm with long-recognized expertise in groundwater resources. Groundwater testing was conducted above the well along with tests of water within the well to better understand and document the shallow perched water source feeding the well. Section 2.2.2 discusses design measures, such as subsurface drains shown in Figure 2.4, to ensure continued water flow to the well. Section 3.8 discusses water quality based upon a technical study conducted by Element Environmental, a firm with long-recognized expertise in this subject, and addresses current pollutants and chemicals being discharged along with an assessment of project effects. In addition, fertilizers are not necessary for maintaining the cemetery lawns, and pesticides are not used by maintenance staff for HMP's cemetery. HMP maintenance staff occasionally use the herbicide Roundup (glyphosate) to address spot areas needing treatment. This herbicide was addressed in detail in Section 3.8 and the water quality study (Appendix I). Further details are provided in our responses to your specific comments later in this letter.

3. *The Service also notes that additional discussion is encouraged in regard to potential coordination with its Partners for Fish and Wildlife Program. We recommend a revised EIS be prepared that addresses these deficiencies.*

Response: Additional information is provided regarding the potential participation in the Partners for Fish and Wildlife Program in our response to your later comments in this letter. As previously responded, we do not view your comments as reflecting deficiencies in the DEIS that warrant a

publication of a revised DEIS. An EIS does not need be exhaustive to the point of discussing all possible details bearing on the proposed action under the rule of reason standard applied in prior judicial reviews. Such a document is adequate if it has been compiled in good faith and sets forth sufficient information to enable the decision-maker to consider the environmental factors involved and to make a reasoned decision after balancing the risks of harm to the environment against the benefits to be derived by the proposed action. The DEIS sections provide sufficient documentation addressing the areas associated with your comments on the damselfly. Our later responses address your comments in further detail, and the Service's comments will be included in the Final EIS (FEIS). The FEIS document will include additional information as warranted to address public and agency comments received on the DEIS in accordance with the State's environmental regulations.

### Hydrology

1. *The Service notes that much of the proposed terrain reconfiguration would occur at the western end of the Petition Area, which lies immediately upslope of the habitat supporting the population of the ESA-listed blackline Hawaiian damselfly. As such, any impacts of such activities to the local hydrology feeding the spring at the site would be immediately detrimental to the integrity and potential long-term survival of this population.*

Response: Section 2.2.2 discusses the project's preliminary design and identifies several design measures and best management practices (BMP) that would be implemented to minimize impacts from short-term construction activities. This includes measures implemented before construction commences and during construction activities. As discussed already, long-term measures have also been incorporated to ensure continued flow of subsurface water to the well and seep area. Section 3.5 identifies several measures to minimize and avoid impacting the well and seep to ensure continued water flow. Measures included monitoring during and post-construction, and fencing around the seep area to protect it from feral pigs currently disturbing and damaging this area. Such measures would ensure a continued flow of subsurface water to the well with the proposed project and would not be detrimental to the integrity and long-term survival of this species.

2. *On subsequent pages, the DEIS does not seem to be internally consistent in its conclusions regarding potential construction impacts to this groundwater flow supporting the blackline Hawaiian damselfly habitat. On page 3-66 the DEIS states that "Based on these tests, it was determined that grading improvements should not have a significant impact on the Petition Area's underlying groundwater conditions or the well and seep." However, on page 3-67 the DEIS states that "The weight of the fill material has the potential to compress existing soils and interrupt or redirect groundwater migration that is moving downslope. This could reduce the permeability of these already poorly permeable soils, impeding or re-routing the downslope direction of groundwater flow." These two statements appear to be at odds with each other, one asserting no impacts, the other admitting that impacts might well occur.*

Response: The DEIS is consistent with the findings regarding short-term construction impacts to groundwater per the two statements referenced in your comments. The quotation from DEIS page 3-67 discussed in your comment has been clarified in the Final EIS to state that water feeding the seep is subsurface rather than groundwater level water. The revised page is attached. This clarification is needed as water feeding the seep was found to be semi-confined, traveling to the seep via soils at depths of 10 feet or more. Water feeding the seep is not provided by water located within a confined aquifer. As stated in your quote from page 3-66, improvements "should not have a significant impact" on the groundwater conditions. It does not state there would be "no impacts" as you assert. That discussion from DEIS Section 3.6.2 acknowledges there could be effects,

although not likely to be significant, to groundwater from filling activities upslope. As discussed previously, the language from DEIS 3-67 (Section 3.6.2) quoted in your comment has been revised for the Final EIS to clarify that subsurface rather than groundwater level water feeds the seep. Therefore, design measures were proposed to minimize such effects (should they occur) consisting of the installation of three subsurface drains to intercept and continue conveying the flow of subsurface water to the well.

3. *We believe that impacts have a reasonable likelihood of occurring, due to both excavation into slopes above the spring habitat that may penetrate bedrock, and soil compaction impacts, as described above.*

Response: Based upon the DEIS analysis and technical studies discussed in Sections 3.5 and 3.6 (technical reports also included in the Appendices) conducted by various experts (e.g. groundwater engineer, entomologist, geotechnical engineer), the proposed project should not have a detrimental impact to the well and seep given the proposed design measures that include preserving the area around the seep and installing subsurface drains upslope to ensure continued subsurface water flow. Well water levels would also be monitored. If monitoring indicates water levels have declined to levels where seep flow could be impacted, an irrigation line extending from the cemetery expansion area irrigation system could be used to temporarily provide water to the seep to stabilize water levels. Testing conducted above the well combined with pump testing of the well allowed the geotechnical engineer to better understand and document the shallow perched water source feeding the well. Based upon information collected and analyzed, sufficient information has been documented in the DEIS to address the likelihood of subsurface water effects that would be minimized with the project.

4. *Furthermore, on Page 2-30, it is observed that, "Excavation work may encounter stiff to hard residual and saprolitic soils and the underlying basalt rock formation. In addition, some of the excavations may encounter boulders, clusters of cobbles, and hard basalt rock formation. It is anticipated that most of the materials may be excavated using normal heavy excavation equipment. However, deep excavations, boulder excavations, and excavations into the underlying basalt rock formation may require the use of hoe rams." This seems to be a direct acknowledgement that excavation activities associated with terrain reconfiguration could indeed penetrate the entire overlying soil horizon and into the underlying basalt bedrock, which would have the potential to impact the groundwater flow at levels below the surface soils. As discussed previously, the DEIS indicates that the most extensive excavation of this type will occur at the western end of the Petition Area, directly above the damselfly habitat. No mention is made of how such excavation impacts might be mitigated.*

Response: As discussed in Section 3.6.1, the groundwater study shows the seep is maintained by the natural discharge of subsurface water moving downslope through poorly permeable residual soils overlying the unweathered Kailua volcanics. This subsurface water is not influenced by the underlying basalt bedrock. In the vicinity of the well and upslope, subsurface water is actually semi-confined. Subsurface water feeding the well flows downslope to the well through subsurface soil at depths of 10 feet or more rather than through surface soil or underlying geology. The intent of the subsurface drainage system is to ensure the continued flow of this subsurface water through subsurface soils. Attached is a revised Figure 3.10 that also shows the basin area that contributes to subsurface flows to the well and seep area. The smaller basin area west of the seep directly contributes subsurface flows to the well, and the larger area contributes flows to the seep area. Based upon the grading plans (Figure 2.3), portions of this area would be filled and not involve deep

excavations that can affect the underlying basalt bedrock. Therefore, the subsurface drainage system proposed within these areas would ensure continued flow of subsurface waters in the event of some compaction of underlying soils. It should be clarified that the most extensive excavations occur well away (over 400 feet) from the well and seep within mauka areas as shown on Figure 2.3. Changes to these upland areas would not significantly impact the subsurface flow of water affecting the seep area (revised Figure 3.10). Section 2.2.2 discusses proposed grading plans in detail and identifies several design measures and other mitigative measures (e.g. BMPs) to address impacts to the topography and soils. Sections 3.1.1 and 3.1.2 also address impacts to topography and soils, and include both short- and long-term measures to mitigate impacts.

5. *The proposed solution to the soil compaction issue presented in the DEIS is to install deeper subsurface drains to route groundwater flow, but it is not specified how far below the existing surface such drains would need to be. If they were deep enough to penetrate whatever underlying aquifer is feeding the present spring (10 feet or deeper, according to the information in the DEIS) and served to change the direction of subsurface groundwater flow, then they themselves could represent potential impacts to the damselfly population.*

Response: As indicated in the DEIS, the design and depth of the proposed subsurface drainage system would be determined during the project's design phase based on additional engineering analysis and more detailed topographic survey data. Subsurface water occurs at depths of 10 feet or more, and the results of boreholes encountered water 15 to 20 feet below the surface. Therefore, the subsurface drains would likely be placed in the range of those depths. These depths would not extend so deep to penetrate the underlying aquifer because that defeats the purpose of having the subsurface drains. These subsurface drains would therefore not negatively impact the damselfly.

6. *The Service also has concerns about the proposed mitigation measures related to the spring habitat. On Page 3-56, one of the measures proposed to minimize potential effects on the damselfly population is to "Conduct regular inspection of the seep to ensure the present low trickle flow of water is continued." However, the DEIS does not also describe what the response would be if the water flow is observed to be declining, or ceases. This possible scenario could result in significant habitat modification or degradation that results in death or injury to the blackline Hawaiian damselfly by significantly impairing behavioral patterns such as breeding, feeding, or sheltering.*

Response: Item No. 1 of measures proposed on page 3-56 states that if water flow is significantly disrupted, measures would be implemented to supplement short-term water flow (i.e. piping in of new water). The FEIS includes additional measures to further clarify how water would be supplemented, and this change is included in the attachment to this letter.

7. *In summary, the DEIS fails to document how groundwater inputs are currently arriving at the current spring head, fails to analyze how the proposed grading, filling and road or retaining wall construction may alter the flow, or how an interruption in such flow would be addressed. If the flow is interrupted, this could have significant impacts to the listed damselfly by leading to partial or complete loss of spring-fed habitat.*

Response: The responses to the prior comments address the Service's inaccurate conclusion that the DEIS fails to document conditions and impacts on the damselfly. The DEIS adequately discusses how subsurface water is flowing to the well and seep based upon an engineering report by a firm with expertise in this field. The findings included groundwater testing conducted above the well combined with pump testing of the well. This combined information and analysis provides a

thorough understanding and documentation of the shallow perched water source feeding the well and seep. Various sections address the project's impact on the damselfly based upon proposed grading plans, and include design measures, BMPs, etc. to avoid (seep area being preserved) and minimize impacts. These sections and responses show the considerable efforts being made to ensure continued flow of water to the well and seep, and thus not have a detrimental impact to the damselfly and seep habitat.

8. *The Service therefore recommends that a revised EIS also evaluate an alternative under which no significant grading, excavation or construction would occur on any of the slopes above the spring along the plausible flow path of the source groundwater, this area being roughly equivalent to that lying southwest of the line labelled "Site Section A" in the DEIS Figure 2.4. Under such an alternative, significant development and ground disruption would be limited to the areas east of the spring, with access obtained by using existing road grades left over from the former dairy farming operation in the area to the best extent possible.*

Response: The suggested alternative is not reasonable or justified based upon the DEIS results and responses previously provided. The suggested alternative would eliminate about 25% of the entire cemetery expansion area with no basis or justification why such a random area is proposed. The DEIS study results demonstrate that the cemetery expansion would not have a detrimental impact to the damselfly and seep habitat. The testing and studies conducted have resulted in a thorough understanding of the shallow perched water source feeding the well and seep. The revised Figure 3.10 attached shows the small confined basin area that contributes to subsurface flows to the well and seep area. The concern with impacting water flow is limited to potential compaction of soils due to filling planned within a portion of this basin area above the seep. Design measures providing subsurface drainage lines would address this by ensuring continued water flow to the well and seep. Response No. 6 clarifies how an irrigation line connecting to the well provides an additional measure to ensure this water flow on a long-term basis. Therefore, this seep would not be significantly impacted by the grading plan, and there is no practicable reason or justification why such a large section of the cemetery expansion should be evaluated as another alternative. In addition, the landscaped grass of the cemetery would improve detention of runoff and increase infiltration improving this watershed area.

### **Environmental Contaminants**

1. *Cemeteries are intensively managed landscapes, and as such make use of a wide array of landscape maintenance chemicals including herbicides, pesticides, and fertilizers. The DEIS acknowledges that such chemicals will be used in the future within the proposed project footprint, and that some residues are already present in or adjacent to the proposed project area.*

Response: Cemeteries are not "intensively managed" landscapes as you suggest, as compared to golf courses. The majority of maintenance consists of mowing lawns to manage grass growth. Fertilizers are not necessary at HMP according to the Petitioner due to the generally fertile conditions, supportive weather conditions, and lower maintenance needed for turf grass. In addition, pesticides are not used by maintenance staff for HMP's cemetery according to the Petitioner. HMP maintenance staff occasionally use the herbicide Roundup (glyphosate) to address spot areas needing treatment. Such use is infrequent due to the generally wet weather in Kāne'ohe, and the nature of cemetery consisting of lawn.

2. *Although the DEIS takes into account the potential delivery of such chemicals into the main Kawa Stream channel in the context of a Clean Water Act Section 303(d) assessment of Total Maximum Daily Load (TMDL), it does not assess the potential for more local transport of such chemicals downslope from the proposed new cemetery development into the spring head and outflow area at levels below TMDL via shallow groundwater percolation or sheet flow during heavy rainstorms. It would seem likely that at least some level of contamination would inevitably be transported immediately downhill into the habitat currently occupied by the damselfly. Peer-reviewed research has demonstrated that aquatic insects such as damselflies are particularly vulnerable to lethal and sub-lethal effects when exposed to pollutants, such as pyrethrin-based pesticides and other chemicals that may be used in landscaping maintenance. The revised EIS should therefore analyze this possibility in greater detail.*

Response: Section 3.8 addresses the potential project effects on water quality using the results from a water quality study for the DEIS (Element Environmental, Appendix I). The samples collected from the Cascade Spring and Parkway sites during the water quality testing can be used to evaluate the current transport of chemicals related to the existing Hawaiian Memorial Park cemetery via shallow perched ground transport (Cascade Spring) and from runoff during storm events (Parkway Site). Such concentrations were presented in Table 3.10 and showed no detection of glyphosate or 2,4-D herbicides, and low levels of diuron from runoff associated with the Lipalu watershed. Using this data collected, it was determined that glyphosate concentrations generated from the proposed project would be small given the low use anticipated, and should not have a significant impact on water quality or the seep. The drainage area associated with the seep only flows during storm events, which account for the vast majority of suspended solids and other pollutants being discharged. Consequently, the seep would not be affected by runoff the majority of the time, and the large quantities of runoff flowing through drainage area during storm events would discharge into the City's box culvert below. Runoff data collected from a volume of about 17.6 million gallons produced during a February 5, 2018 storm event was estimated to have less than a tablespoon of glyphosate. As previously discussed, fertilizer and pesticides are not used for maintenance of the cemetery, and would not affect the seep or the damselfly. Section 3.5 has been revised in the FEIS to include discussion addressing effects from chemicals as part of cemetery maintenance, and this revised section is attached to this letter.

3. *Consistent with the hydrology concerns stated above, the Service recommends that the revised EIS also evaluate an alternative under which no landscaped areas of any sort would be created on any of the slopes draining into the damselfly habitat; this area again being roughly equivalent to the portion of the parcel lying southwest of the line labelled "Site Section A" in the DEIS Figure 2.4.*

Response: Our prior response (No. 8 under hydrology) addressed this suggested alternative which is not reasonable, practicable, or justified based upon the DEIS analysis. The DEIS discussion of water quality and herbicides along with the response further supports why the suggested alternative is not reasonable or justified.

### **Partnership**

1. *On Page ES-7, the DEIS states that in regard to the damselfly habitat "Coordination would be conducted with the U.S. Fish and Wildlife Service to establish a habitat restoration and conservation program for this damselfly's habitat under the Partners for Fish and Wildlife program." The Service acknowledges that some initial conceptual discussions have occurred, and the DEIS does mention certain mitigating measures, including construction of fencing around the damselfly habitat, monitoring for invasive aquatic species, and providing molting perches in aquatic areas away from*



*introduced ants, all of which would be useful and beneficial components of such a habitat restoration and conservation plan. However, we still have concerns for the potential impacts resulting from the proposed changes in hydrology upslope and the environmental contaminants on the damselfly and its habitat.*

Response: Our prior responses under the hydrology and environmental contaminants headings address this comment regarding concerns with project effects.

- 2. Lastly, no substantive progress towards a Partners for Fish and Wildlife conservation project has been made to date in regard to an actual proposal detailing specific activities, timeline or budget. Therefore, we recommend that a timeline should be provided in the revised EIS in regard to how coordination on this matter will proceed.*

Response: At this time, no further progress needs to be made toward formally establishing the Partners for Fish and Wildlife program with the Petitioner. Participation in such a program would need to occur after approval of the boundary amendment (Land Use Commission) is obtained for the project, and the design phase is initiated. Consequently, it is premature at this time to develop a proposal detailing specific activities, timeline, and budget for participation in such a program. Such details would not change the DEIS impact assessment results. In addition, the feasibility and practicability of initiating participation in such a partnership first needs to be evaluated in relation to the Cultural Preserve being established and managed by the Ko'olaupoko Hawaiian Civic Club in the context of the entire project. Because this area is designated as a historic site, the area's management and conservation may more appropriately fall under the management and preservation by the civic club.

- 3. Although we encourage continued coordination with the Partners for Fish and Wildlife program in order to establish a habitat restoration and conservation program for the damselfly's habitat, please note that the successful development of a habitat restoration plan may not necessarily relieve the project proponent from the need to comply with the ESA. If the final proposed action still includes potential changes in the hydrology or use of landscaping chemicals that may result in take of the endangered blackline Hawaiian damselfly, we recommend you contact our office early in the planning process so that we may assist you with the ESA compliance.*

Response: The prior response addresses the status of future coordination with the Service in evaluating the feasibility of participating in the program. Any applicable ESA requirements would be complied with, and no federal permit would be required for grading improvements in the vicinity of this seep area and associated basin. Sufficient measures have been proposed to avoid and minimize impacts on the damselfly and seep. As already discussed, this area around the seep would be preserved, and design measures would ensure a continued supply of water to the well and seep.

- 4. If no Federal agency is involved with the proposed project, we recommend the Petitioner request an incidental take permit under section 10(a)(1)(B) of the ESA. The section 10 permit application must include a habitat conservation plan that identifies the effects of the action on listed species and their habitats, and defines measures to minimize and mitigate those adverse effects.*

Response: As previously discussed, the project should not result in a take of the damselfly. Sufficient measures have been proposed to avoid and minimize impacts on the damselfly and seep, therefore, an incidental take permit would not be required.

**Summary**

1. *In summary, we recommend that the revised EIS address in more detail the potential threats to the local population of blackline Hawaiian damselfly specifically in regard to hydrology and environmental contaminants, and also analyze an alternative under which no cemetery development or major land disturbance would occur on any slopes directly above or draining into the damselfly habitat.*

Response: Based upon our previous responses, the DEIS provides sufficient information and documentation to address the proposed project effect on the damselfly and seep area. This information adequately addressed the area's hydrology and environmental contaminants. Additional information has been added to the FEIS to address your comments. The suggested alternative is not reasonable, practicable, or justified based upon the DEIS analysis. The DEIS demonstrates that the cemetery expansion would not have a detrimental impact to the damselfly and seep habitat, and sufficient design measures have been proposed to minimize impacts to the flow of water from the seep. The area along the seep would also be preserved reflecting reasonable measures to avoid impacts.

2. *The Service also encourages the Petitioner to engage at their earliest opportunity with the Partners for Fish and Wildlife Program, and for the revised EIS to provide a timeline for implementation of such a partnership and its associated mitigation activities. If incidental take of the blackline Hawaiian damselfly cannot be avoided, we also recommend the Petitioner request an incidental take permit under section 10(a)(1)(B) of the ESA.*

Response: No further progress needs to be made toward formally establishing the Partners for Fish and Wildlife program with the Petitioner at this time, and it is premature to develop a proposal detailing specific activities, timeline, and budget for participation in such a program. The feasibility of such a partnership would need to be evaluated in relation to the proposed Cultural Preserve to be managed by the Ko'olaupoko Hawaiian Civic Club because this area is designated as a historic site that may more appropriately fall under the management and conservation by the civic club. Finally, sufficient measures have been proposed to avoid and minimize impacts on the damselfly and seep, therefore, an incidental take would not result from the project.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,



Scott Ezer, Principal

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

# ATTACHMENT - FINAL EIS REVISIONS

## U.S. FWS - HYDROLOGY, COMMENT 2

intercept, impede, or reroute the subsurface water~~groundwater~~ flow that maintains the perennial seep.

Based upon these tests, it was determined that grading improvements should not have a significant impact on the Petition Area's underlying groundwater conditions or the well and seep. The entire Petition Area overlies caldera-filling volcanics that are virtually impermeable. As such, grading improvements and cemetery use of the area do not have the potential to impact ongoing or possible future uses of groundwater drawn from the permeable Koolau volcanics of the Koolaupoko Aquifer System.

Regarding the well and seep, the footings of the retaining walls proposed as part of the project grading plan would be too shallow to intercept the subsurface water~~groundwater~~ moving downslope. The retaining walls and fill behind them would include subsurface drains (discussed in Chapter 2).

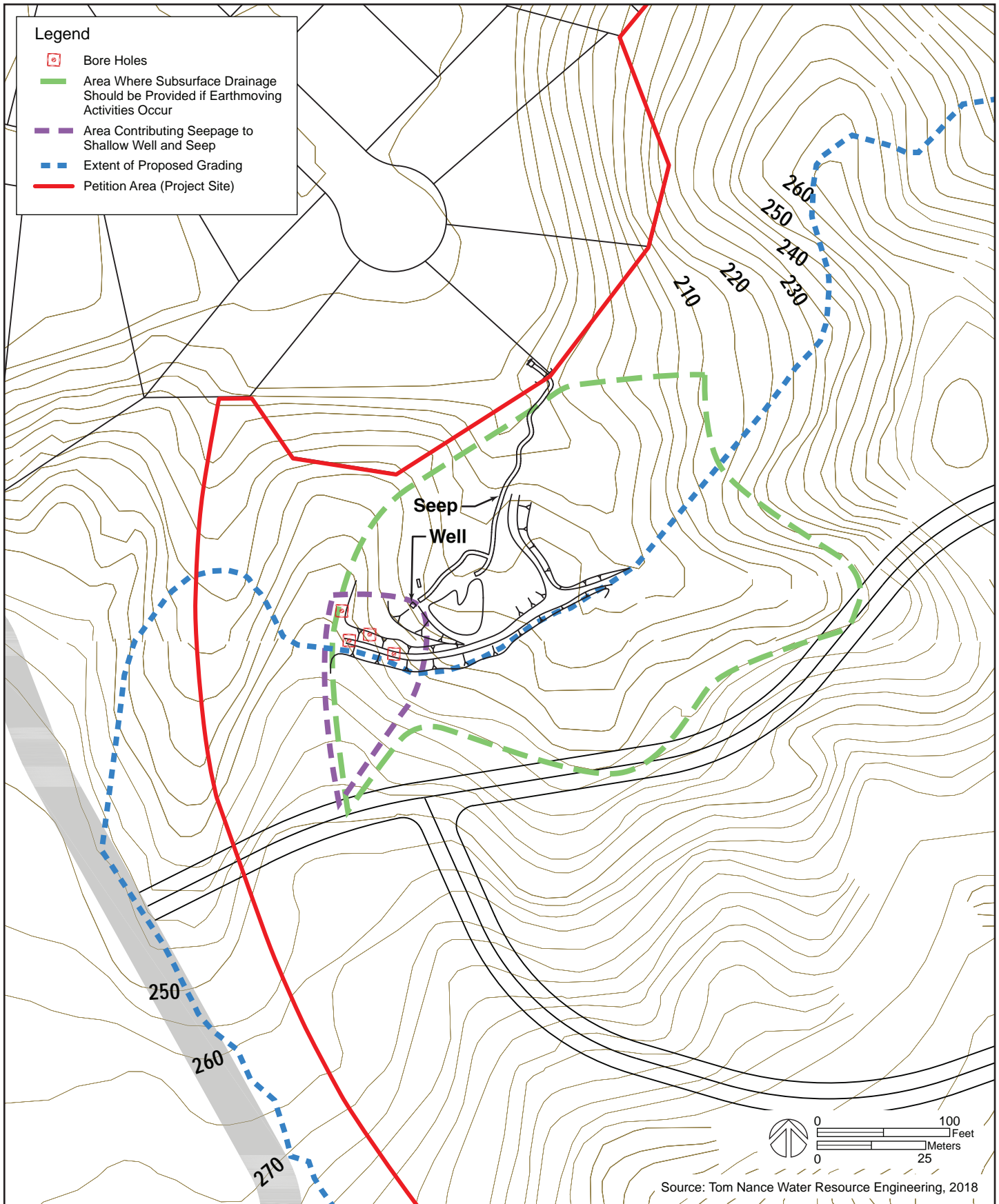
Proposed cemetery expansion improvements are expected to have a minimal impact on the quality and volume of groundwater underlying the aquifer. The project would not significantly impact the regional watershed area or the aquifer sustainable yield of 30 mgd. Some potable water would be used to irrigate the cemetery expansion area, but the wet climate of the windward district reduces the amount of irrigation required. Cemetery operational staff indicate that irrigation is rarely needed. Water used for irrigation would have a negligible effect on the aquifer system's sustainable yield. As previously discussed, existing wells within the aquifer have a total permitted use of 10.312 mgd, and total use closely matched the permitted use volume. Additional water for irrigation use for the project would have minimal change to this use, which is well below the aquifer's sustainable yield.

These improvements would also have minimal effect on the water quality of the underlying groundwater because the entire Petition Area overlies caldera-filling volcanics that are virtually impermeable. The Petition Area is located below and well away from the UIC line that generally runs mauka of Kamehameha Highway, and is thus situated above an exempt portion of the Ko'olaupoko Aquifer.

### Proposed ~~Mitigative~~ Minimization Measures

The weight of the fill material has the potential to compress existing soils and interrupt or redirect subsurface water~~groundwater~~ migration that is moving downslope. This could reduce the permeability of these already poorly permeable soils, impeding or re-routing the downslope direction of subsurface water~~the groundwater~~ flow. To ensure that the quantity and direction of subsurface water~~groundwater~~ flow is maintained to the well and the seep, the following design measures are proposed.

**ATTACHMENT - FINAL EIS REVISIONS**  
**U.S. FWS - HYDROLOGY, COMMENT 4 & 8**



**Location of Well, Seep and Borings**

**Figure 3.10**

# ATTACHMENT - FINAL EIS REVISIONS

## U.S. FWS - HYDROLOGY, COMMENT 6

### Proposed Mitigative Avoidance and Minimization Measures

To minimize potential effects on the endangered damselfly, the following measures are proposed:

1. Conduct regular inspection of the seep to ensure the present low trickle flow of water is continued. Inspection could involve development of a monitoring plan during the project design phase. The plan would include BMP measures (i.e. erosion control) and would be implemented during the project's construction phase. Inspection of the seep should be conducted before the start of construction to establish baseline water flow conditions. Monitoring would occur during construction with the seep area inspected on a weekly basis to evaluate water flow in coordination with BMP measures. Once construction concludes, monitoring would continue for an additional six months to ensure continued seep water flow. Inspections would occur weekly for the first three months and every two weeks thereafter if conditions are satisfactory. After the six month period elapses, HMP staff would conduct monthly water flow inspections. If water flow is significantly disrupted, measures would be implemented to supplement short-term water flow (i.e. piping in of new water). Appropriate measures would be determined through consultation between the contractor and the design team or other specialists to evaluate conditions and resulting measures. This has been successful at another site for a related endangered damselfly (Evenhuis et al. 1995).
2. A well monitoring gauge or other appropriate device would be installed inside the well located upslope from the seep to monitor water levels prior to, during, and after project construction. Once project earthmoving activities conclude, a permanent irrigation line extending from the proposed cemetery expansion area's irrigation system to the well would be installed. This irrigation line would serve as a long-term means of ensuring continued water flows at the seep. If the gauge indicates water levels have declined to levels potentially affecting the seep, water from the irrigation line to the well could be provided to stabilize water levels. During construction, a temporary irrigation line would also be extended to the well to support water levels, if necessary.
- ~~3.~~ Monitor as part of seep inspections to ensure non-native fish, such as the Western Mosquitofish, are not present within this habitat area. Individuals conducting seep water flow inspections should be aware of the presence of alien fishes and should notify experienced biologists if fishes are sighted to ensure prompt identification and removal.
- ~~3.~~4. Review the habitat boundaries currently shown based upon more accurate data collected from a topographic survey during project final design. Revise habitat boundary as appropriate. Construct fencing around the damselfly habitat boundary to protect native damselfly from disturbance by feral pigs. Fencing should consist of hog wire designed with a lower barbed strand to resist digging.
- ~~4.~~5. Place small sticks upright and away from the edges of waterlogged areas to serve as molting safe zones to avoid predation during molting. These sticks would protect naiads because ants would not cross water barriers.

deep. The system would be designed to intercept and convey the flow of subsurface water to the well and seep. Possible alignments are shown conceptually in Section 3.6.2 and Figure 2.3. This design would minimize potential impedance of subsurface water flows due to potential compaction of soils from fill activities planned mauka of the well.

To further ensure continued water flow to the seep, a monitoring gauge or other appropriate device would be installed inside the well to monitor water levels. A permanent irrigation line extending from the proposed cemetery expansion area's irrigation system to the well would also be installed. This irrigation line would serve as a long-term means of ensuring continued water flows to the seep. If the gauge indicates water levels have declined to levels potentially affecting the seep, water from the irrigation line to the well could be provided to stabilize water levels.

The cemetery expansion area would include maintenance activities to manage grass growth, such as lawn mowing and trimming of other vegetation. However, cemeteries are not intensively managed landscapes as compared to golf courses. Fertilizers are not necessary for use at the existing HMP cemetery due to the generally fertile conditions, supportive weather conditions, and lower maintenance needed for turf grass. Pesticides are also not used by maintenance staff for HMP's cemetery. HMP maintenance staff occasionally use the herbicide Roundup (glyphosate) to address spot areas needing treatment. However, such use is infrequent due to the generally wet weather in Kāneʻohe, and the characteristics of the cemetery lawn that primarily need to be mowed.

Glyphosate concentrations generated from the cemetery maintenance activities would be small, given the low use anticipated, and should not have a significant impact on the seep's water quality and damselfly based upon the water quality study prepared for this EIS. Section 3.8 addresses the potential project effects on water quality from this study (Appendix I). Water quality samples collected and tested from the Cascade Spring and Parkway sites were used to evaluate the current transport of chemicals related to the existing HMP cemetery via shallow perched ground transport (Cascade Spring) and from runoff during storm events (Parkway Site). Such concentrations were presented in Table 3.10 and showed no detection of glyphosate or 2,4-D herbicides, and low levels of diuron from runoff associated with the Lipalu watershed.

The drainage area associated with the seep only flows during storm events, which accounts for the vast majority of suspended solids and other pollutants being discharged from the Petition Area. Consequently, the seep would not be affected by runoff the majority of the time, and the large quantities of runoff flowing through the drainage area during storm events would discharge into the City's box culvert below. Runoff data collected from a volume of about 17.6 million gallons produced during a February 5, 2018 storm event was estimated to have less than a tablespoon of glyphosate.







## United States Department of the Interior

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

October 22, 2018

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

Dear Mr. Sato:

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

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

We appreciate the opportunity to participate in the review process.

Sincerely,

Stephen S. Anthony  
Center Director

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





March 29, 2019

Mr. Stephen Anthony, Center Director  
Pacific Islands Water Science Center  
U.S. Geological Survey  
U.S. Department of the Interior  
NOAA Inouye Regional Center (IRC)  
1845 Wasp Boulevard, Building 176  
Honolulu, HI 96818

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

Dear Mr. Anthony:

Thank you for the October 22, 2018 letter acknowledging receipt of the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (italicized).

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

Response: We acknowledge that the U.S. Geological Survey Pacific Islands Water Science Center was unable to review the DEIS due to prior departmental commitments and lack of available staff.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ezer".

Scott Ezer, Principal

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

(P)1523.8

SEP 24 2018

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

Dear Mr. Sato:

Subject: Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion Project  
Kaneohe District, Oahu, Hawaii  
TMK: (1) 4-5-033: por 001

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

If you have any questions, your staff may call Ms. Gayle Takasaki of the Planning Branch at 586-0584.

Sincerely,

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

KEITH S. KOGACHI  
Acting Public Works Administrator

GT:mo

c: Mr. Scott Derrickson, DBEDT LUC



March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāne'ohe, O'ahu, Hawai'i

Dear Mr. Kogachi:

Thank you for the September 24, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (italicized).

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

Response: We acknowledge your assessment that the proposed project does not impact any Department of Accounting and General Services' projects or existing facilities. We acknowledge that your agency has no other comments to offer at this time.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer".

Scott Ezer, Principal

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

October 22, 2018

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

via email: [rsato@hhf.com](mailto:rsato@hhf.com)

Dear Mr. Sato:

**SUBJECT: Draft Environmental Impact Statement (DEIS) for Hawaiian Memorial Park Cemetery Expansion Project**

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

At this time, enclosed are comments from the (a) Engineering Division, (b) Land Division – Oahu District and (c) Commission on Water Resource Management 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 black ink, appearing to read "Russell Y. Tsuji".

Russell Y. Tsuji  
Land Administrator

Enclosure(s)

cc: Central Files  
S. Derrickson, DBEDT

via email: [scott.a.derrickson@hawaii.gov](mailto:scott.a.derrickson@hawaii.gov)

DAVID Y. IGE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

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

2018 SEP 20 AM 10:42

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

September 10, 2018

MEMORANDUM

TO:  
FROM

**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

TO

FROM: Russell Y. Tsuji, Land Administrator *RT*

SUBJECT: Draft Environmental Impact Statement (DEIS) for **Hawaiian Memorial Park Cemetery Expansion Project**

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

APPLICANT: Hawaiian Memorial Life Plan, Ltd.

18 SEP 11 AM 11:21 ENGINEERING

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **October 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 <sup>additional</sup> objections.
- We have no comments.
- Comments are attached.

Signed: *Carty S. Chang*

Print Name: Carty S. Chang, Chief Engineer

Date: 9/17/18

Attachment  
cc: Central Files



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

September 10, 2018

MEMORANDUM

RECEIVED  
LAND DIVISION  
2018 SEP 12 PM 1:41  
DEPT. OF LAND &  
NATURAL RESOURCES  
STATE OF HAWAII

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:

Draft Environmental Impact Statement (DEIS) for **Hawaiian Memorial Park Cemetery Expansion Project**

LOCATION:

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

APPLICANT:

Hawaiian Memorial Life Plan, Ltd.

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **October 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:

Darlene Bryant-Takamatsu

Date:

9/12/18

Attachment

cc: Central Files

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

September 10, 2018

MEMORANDUM

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

FR:

2018 SEP 11 PM 2:45

FROM:

Russell Y. Tsuji, Land Administrator

SUBJECT:

Draft Environmental Impact Statement (DEIS) for **Hawaiian Memorial Park Cemetery Expansion Project**

LOCATION:

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

APPLICANT:

Hawaiian Memorial Life Plan, Ltd.

Transmitted for your review and comment is information on the above-referenced project. Please submit any comments by **October 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: /s/ W. Roy Hardy

Print Name: Hydrologic Program Manager

Date: October 19, 2018

Attachment  
cc: Central Files

FILE ID:	RFD-1969.3
DOC ID:	20518 ✓



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
**COMMISSION ON WATER RESOURCE MANAGEMENT**  
P.O. BOX 621  
HONOLULU, HAWAII 96809

October 19, 2018

REF: RFD.1969.3

TO: Mr. Russell Tsuji, Administrator  
Land Division

FROM: W. Roy Hardy, Hydrologic Program Manager *W. Roy Hardy*  
Commission on Water Resource Management

SUBJECT: Draft Environmental Impact Statement (DEIS) for Hawaiian Memorial Park Cemetery Expansion Project

FILE NO.: RFD.1969.3  
TMK NO.: (1) 4-5-033:001

Thank you for the opportunity to review the subject document. The Commission on Water Resource Management (CWRM) is the agency responsible for administering the State Water Code (Code). Under the Code, all waters of the State are held in trust for the benefit of the citizens of the State, therefore all water use is subject to legally protected water rights. CWRM strongly promotes the efficient use of Hawaii's water resources through conservation measures and appropriate resource management. For more information, please refer to the State Water Code, Chapter 174C, Hawaii Revised Statutes, and Hawaii Administrative Rules, Chapters 13-167 to 13-171. These documents are available via the Internet at <http://dlnr.hawaii.gov/cwrmm>.

Our comments related to water resources are checked off below.


1. We recommend coordination with the county to incorporate this project into the county's Water Use and Development Plan. Please contact the respective Planning Department and/or Department of Water Supply for further information.
2. We recommend coordination with the Engineering Division of the State Department of Land and Natural Resources to incorporate this project into the State Water Projects Plan.
3. We recommend coordination with the Hawaii Department of Agriculture (HDOA) to incorporate the reclassification of agricultural zoned land and the redistribution of agricultural resources into the State's Agricultural Water Use and Development Plan (AWUDP). Please contact the HDOA for more information.
4. We recommend that water efficient fixtures be installed and water efficient practices implemented throughout the development to reduce the increased demand on the area's freshwater resources. Reducing the water usage of a home or building may earn credit towards Leadership in Energy and Environmental Design (LEED) certification. More information on LEED certification is available at <http://www.usgbc.org/leed>. A listing of fixtures certified by the EPA as having high water efficiency can be found at <http://www.epa.gov/watersense>.
5. We recommend the use of best management practices (BMP) for stormwater management to minimize the impact of the project to the existing area's hydrology while maintaining on-site infiltration and preventing polluted runoff from storm events. Stormwater management BMPs may earn credit toward LEED certification. More information on stormwater BMPs can be found at <http://planning.hawaii.gov/czm/initiatives/low-impact-development/>
6. We recommend the use of alternative water sources, wherever practicable.
7. We recommend participating in the Hawaii Green Business Program, that assists and recognizes businesses that strive to operate in an environmentally and socially responsible manner. The program description can be found online at <http://energy.hawaii.gov/green-business-program>.
8. We recommend adopting landscape irrigation conservation best management practices endorsed by the Landscape Industry Council of Hawaii. These practices can be found online at



[http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH\\_Irrigation\\_Conservation\\_BMPs.pdf](http://www.hawaiiscape.com/wp-content/uploads/2013/04/LICH_Irrigation_Conservation_BMPs.pdf).

- 9. There may be the potential for ground or surface water degradation/contamination and recommend that approvals for this project be conditioned upon a review by the State Department of Health and the developer's acceptance of any resulting requirements related to water quality.
- 10. The proposed water supply source for the project is located in a designated water management area, and a Water Use Permit is required prior to use of water. The Water Use Permit may be conditioned on the requirement to use dual line water supply systems for new industrial and commercial developments.
- 11. A Well Construction Permit(s) is (are) are required before the commencement of any well construction work.
- 12. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.
- 13. There is (are) well(s) located on or adjacent to this project. If wells are not planned to be used and will be affected by any new construction, they must be properly abandoned and sealed. A permit for well abandonment must be obtained.
- 14. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 15. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a steam channel.
- 16. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- 17. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 18. The planned source of water for this project has not been identified in this report. Therefore, we cannot determine what permits or petitions are required from our office, or whether there are potential impacts to water resources.
- OTHER: There is an apparently unused well source described in pages 3-62 to 3-66. This well is not registered with the Commission. On May 16, 1990 a well permit was approved by the Commission for well 2347-010, which expired on May 29, 1992, but the well was never reported as constructed and we are not sure this is the same well or a different well. Obviously, given the details in the draft EIS, the ground water is very shallow in this area, and the Commission assumes a 1 to 1 relationship between ground water and surface water interaction in the Koolaupoko Aquifer System Area. This means any water pumped from this well source is assumed to have a 1 to 1 relationship with any nearby surface water features, such as springs or Kawa Stream.

If you have any questions, please contact W. Roy Hardy of the Commission staff at 587-0225.


  
 STATE OF HAWAII
   
 DEPARTMENT OF LAND AND NATURAL RESOURCES
   
 DIVISION OF LAND MANAGEMENT
   
 1505 ALI'OLEA DRIVE, SUITE 200
   
 HONOLULU, HAWAII 96813
   
 PHONE: (808) 586-2500
   
 FAX: (808) 586-2501
   
 WWW: www.dlnr.gov

TO: Mr. Roy Hardy, Administrator
   
 FROM: Ms. Kathy Yoda, Planning Program Manager
   
 SUBJECT: Draft Environmental Impact Statement (EIS) for Hawaiian Memorial Park Cemetery Expansion Project
   
 RE: EIS
   
 DATE: 10/19/2018

Thank you for the opportunity to review the subject document. The Commission on Urban Planning and Design (CUPD) is pleased to provide comments on the Draft Environmental Impact Statement (EIS) for the Hawaiian Memorial Park Cemetery Expansion Project. The EIS was prepared by the State of Hawaii Department of Land and Natural Resources (DLNR) and the State of Hawaii Department of Planning and Economic Development (DPED). The EIS was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) and the Hawaii Environmental Quality Act (HEQIA). The EIS was prepared in accordance with the requirements of the National Environmental Policy Act (NEPA) and the Hawaii Environmental Quality Act (HEQIA).






# Doc Review RFD.1969.3 Hawaiian Memorial Park Cemetery Expansion Project

Adobe Sign Document History

10/19/2018

Created:	10/19/2018
By:	Kathy Yoda (kathy.s.yoda@hawaii.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAm9UPWMs91s08e7hMwDB6sYQQbae1i7EF

## "Doc Review RFD.1969.3 Hawaiian Memorial Park Cemetery Expansion Project" History

-  Document created by Kathy Yoda (kathy.s.yoda@hawaii.gov)  
 10/19/2018 - 1:22:34 PM HST- IP address: 132.160.239.30
-  Document emailed to Roy Hardy (roy.hardy@hawaii.gov) for signature  
 10/19/2018 - 1:23:05 PM HST
-  Document viewed by Roy Hardy (roy.hardy@hawaii.gov)  
 10/19/2018 - 1:28:27 PM HST- IP address: 132.160.239.30
-  Document e-signed by Roy Hardy (roy.hardy@hawaii.gov)  
 Signature Date: 10/19/2018 - 1:28:39 PM HST - Time Source: server- IP address: 132.160.239.30
-  Signed document emailed to all eligible parties.  
 10/19/2018 - 1:28:39 PM HST





March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Tsuji:

Thank you for the October 22, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have the following responses to these comments (*italicized*) divided by division.

**Engineering Division**

*We have no additional comments.*

Response: We acknowledge that the Engineering Division has no additional comments.

**Land Division, Oʻahu District**

*We have no comments.*

Response: We acknowledge that the Land Division, Oʻahu District has no comments.

**Commission on Water Resource Management**

*There is an apparently unused well source described in pages 3-62 to 3-66. This well is not registered with the Commission. On May 16, 1990 a well permit was approved by the Commission for well 2347-010, which expired on May 29, 1992, but the well was never reported as constructed and we are not sure this is the same well or a different well. Obviously, given the details in the draft EIS, the ground water is very shallow in this area, and the Commission assumes a 1 to 1 relationship between ground water and surface water interaction in the Koolaupoko Aquifer System Area. This means any water pumped from this well source is assumed to have a 1 to 1 relationship with any nearby surface water features, such as springs or Kawa Stream.*

Response: Well No. 2347-010 was proposed for construction by Hawaiian Memorial Park (HMP) in TMK (1) 4-5-035: 008. The proposed construction location was near the current site of the H-3 Freeway off ramp onto Kamehameha Highway's northbound lanes. The permitted location of Well No. 2347-010 was indicated in the staff submittal applicable to this permit provided during the May 16, 1990 Commission meeting. Given this information, the shallow well in the Petition Area is not Well No. 2347-010. As

indicated in your comment, the well permit applicable to Well No. 2347-010 was approved on May 16, 1990 and later expired on May 29, 1992 with well construction unreported. HMP did not pursue construction of Well No. 2347-010. The project is not expected to impact the relationship between subsurface water resources associated with the Petition Area shallow well and nearby surface water features as subsurface water associated with the well only flows to the seep located downslope. Additionally, the project does not propose use of this well. As discussed in the Draft EIS, a subsurface drainage system designed in a herringbone pattern would be constructed in the fill area above the well to ensure continued subsurface water flow to the well if it is determined project implementation will impede this flow. A monitoring device would also be installed in the well along with a permanent irrigation line extending from the proposed cemetery expansion area irrigation system. If the device indicates well water level has declined to levels where flow to the seep could be impacted, water to the well would be temporarily provided via the irrigation line. Therefore, the project is not expected to impact the well's subsurface level water resources or nearby surface water resources. The Petitioner will register the shallow well with the Commission upon approval of the project by the LUC.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with the first name "Scott" being more legible than the last name "Ezer".

Scott Ezer, Principal

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

ROBERT K. MASUDA  
FIRST DEPUTY

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

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

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES

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

REF:OCCL:TM

Correspondence: 19-43

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

OCT 23 2018

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

Dear Mr. Sato:

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

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

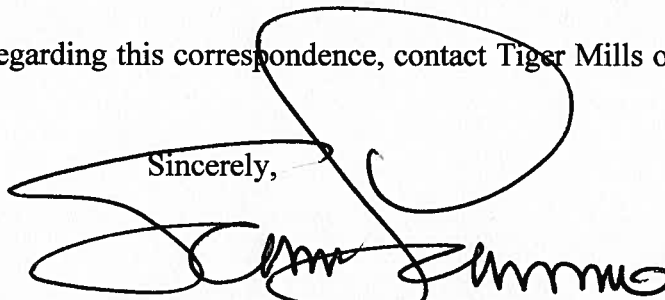
The OCCL appreciates the protection and preservation of the undeveloped area and Cultural Preserve area. Regarding the Cultural Preserve area, it is understood that a Preservation Plan will be developed to provide guidance for cultural activities and undertakings, access and management responsibilities.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

In reviewing the drainage plan for the area we note, “the USGS has observed that single storm events may deliver the equivalent of years, even decades of the pollutant loads received by coastal waters over time under less extreme weather conditions;” and “Large episodic storm events produce the vast majority of sediment and nutrient loads that enter Kane‘ohe Bay from Kawa Stream.” The Drainage Report describes how the data collection site was destroyed in less than 2 hours during a high volume episodic rain event. The OCCL further notes the draft preliminary engineering report calls for the installation of retention basins for 93,500G.

With climate change, it is expected that there may be more high volume episodic rain events. The OCCL would like HMP to also consider off site mitigation to decrease the pollutant loads to Kawa Stream and Kane‘ohe Bay such as streambank restoration with native plants. The OCCL further requests that any plantings within the designated area give preference to endemic or indigenous plants to Hawai‘i and that invasive plant species be prohibited in the petitioned area. Within the Preserve area, appropriate Polynesian introduced plants are also suggested under proper protocol.

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

Sincerely,



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

C: Chairperson  
ODLO  
LUC  
City-DPP



March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Lemmo:

Thank you for the October 23, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (*italicized*) that have been numbered.

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

Response: The proposed project does reflect changes from the prior plan in the 2008 Final EIS (FEIS) as you have indicated, and the other project information identified is generally consistent with project plans.

2. *The OCCL appreciates the protection and preservation of the undeveloped area and Cultural Preserve area. Regarding the Cultural Preserve area, it is understood that a Preservation Plan will be developed to provide guidance for cultural activities and undertakings, access and management responsibilities.*

Response: We acknowledge OCCL's appreciation for protecting and preserving the Cultural Preserve and remaining undeveloped areas associated with the larger property. A Preservation Plan is proposed as a measure to provide guidance for cultural activities, access, and management responsibilities occurring within the preserve.



3. *In discussion with individuals with knowledge of traditional practices, due to the proximity of the Po'ō Kanaka Luakini Heiau, we understand that proper protocols and a buffer or designated area for traditional Hawaiian burials shall be observed to insure the Heiau will not be disturbed.*

Response: The Preservation Plan would designate areas for traditional Hawaiian burials that would include an appropriate buffer from the heiau in accordance with proper protocols.

4. *In reviewing the drainage plan for the area we note, "the USGS has observed that single storm events may deliver the equivalent of years, even decades of the pollutant loads received by coastal waters over time under less extreme weather conditions;" and "Large episodic storm events produce the vast majority of sediment and nutrient loads that enter Kāne'ōhe Bay from Kawa Stream." The Drainage Report describes how the data collection site was destroyed in less than 2 hours during a high volume episodic rain event. The OCCL further notes the draft preliminary engineering report calls for the installation of retention basins for 93,500 G.*

Response: We acknowledge the information you obtained from the drainage plan characterizing the conditions that generate sediment and nutrient loads from the Petition Area, and that the detention basins would be designed to retain about 12,700 cubic feet (about 95,000 gallons) of stormwater.

5. *With climate change, it is expected that there may be more high volume episodic rain events. The OCCL would like HMP to also consider off site mitigation to decrease the pollutant loads to Kawa Stream and Kāne'ōhe Bay such as streambank restoration with native plants.*

Response: Section 3.2.5 of the DEIS addressed climate change and its effect on the project. Flooding was addressed in Section 3.2.4. However, off-site mitigation of Kāwā Stream's streambank is not required or warranted by the project because grading improvements and drainage plans would decrease storm water runoff and reduce pollutant loads. Section 2.2.2 describes that the proposed project's preliminary design would accommodate the 100-year storm event instead of the required 10-year storm event; detention basins would reduce the discharge volumes by an additional 3 percent for the 100-year storm event. Consequently, the proposed project would improve the watershed and surface waters within the Petition Area, and improve water quality by reducing runoff velocity, volumes, and erosion. Proposed retention basins would also improve water quality by reducing the presence of sediments and nutrients in site runoff. The retention basins would temporarily retaining runoff, allowing pollutants time to settle before runoff is discharged off site. Kāwā Stream is also under the City's jurisdiction within the residential subdivision, so it would be more appropriate for the City to implement streambank restoration efforts.

6. *The OCCL further requests that any plantings within the designated area give preference to endemic or indigenous plants to Hawai'i and that invasive plant species be prohibited in the petitioned area. Within the Preserve area, appropriate Polynesian introduced plants are also suggested under proper protocol.*

Response: Endemic or indigenous plants would be incorporated in the cemetery landscaping plans where appropriate. In particular, endemic plant species identified in the Petition Area, such as Ohī'a Lehua, could be collected and replanted in the cemetery expansion area and Cultural Preserve. This would ensure the continued presence of this endemic species in the Petition Area. Other native plants along with other appropriate Polynesian introduced plants would be incorporated into restoration efforts of the cultural preserve.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

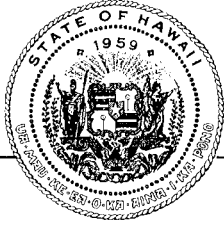
Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with the first name "Scott" and the last name "Ezer" clearly legible.

Scott Ezer, Principal

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





## OFFICE OF PLANNING STATE OF HAWAII

DAVID Y. IGE  
GOVERNOR

LEO R. ASUNCION  
DIRECTOR  
OFFICE OF PLANNING

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/>

DTS201810190822NA

October 19, 2018

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

Dear Mr. Sato:

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

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

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

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

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

1. Previous Comments

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

Mr. Ronald A. Sato, AICP  
October 19, 2018  
Page 2

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

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

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

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

Sincerely,



Leo R. Asuncion  
Director

cc: Scott Derrickson, Land Use Commission



March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawai'i

Dear Mr. Asuncion:

Thank you for the October 19, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (italicized) that have been numbered.

1. *Previous Comments: Our Environmental Impact Statement Preparation Notice (EISPN) response letter dated January 17, 2018 (DTS 20180 1170934BE), requested the DEIS*
  - a. *Analyze the project's consistency with all of the Hawaii State Planning Act, Hawaii Revised Statutes (HRS) Chapter 226;*
  - b. *Provide an examination of HRS § 205A-2, the objectives and policies of the Hawaii Coastal Zone Management (CZM) Program; and*
  - c. *Provide an analysis on stormwater control methods, drainage, and mitigation strategies to safeguard the nearby water resources and the coastal/marine ecosystems.*
  - d. *Other studies would be included within the DEIS, such as cemetery capacity, traffic impacts, impacts to surface and ground water, feasibility of using non-potable water for irrigation, wastewater issues, archaeological and cultural impacts, alternatives for the project, soils and topography, rockfall studies, botanical, invertebrate and faunal studies, cultural impacts, including Kapaakai analysis, county requirements and regulatory constraints.*

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

Response: We acknowledge the Office of Planning's assessment that comments and concerns discussed in comments previously submitted for the project Environmental Impact Statement Preparation Notice were sufficiently addressed in the DEIS.

2. *However, we note that the DEIS does not include comments from the State Historic Preservation Division (SHPD). Pursuant to HRS § 205-17 Land Use Commission decision-making criteria, areas of State concern required to be addressed include section 3. (B) Maintenance of valued cultural, historical, or natural resources. Thus, we suggest that prior to proceeding with processing of the*

*Petition to reclassify the Petition Area from the State Conservation to the Urban Land Use District, that the Petitioner submit Appendix J Archaeological Inventory Survey for Hawaiian Memorial Park, Kaneohe Ahupuaa, Koolaupoko District, Island of Oahu, and Appendix K Draft Cultural Impact Assessment Report for Hawaiian Memorial Park Expansion Area, Kaneohe Ahupuaa, Koolaupoko District, Oahu Island to SHPD for a Chapter 6E review to obtain their review and comments.*

Response: We have coordinated with the State Land Use Commission (LUC) to submit the Archaeological Inventory Survey (AIS) to the State Historic Preservation Division (SHPD) for review under Chapter 6E, HRS in accordance with SHPD's procedures on September 10, 2018. The Cultural Impact Assessment Report was not submitted to SHPD for review because they do not officially review such reports under their procedures. Our project team has been following up with SHPD on the status of their AIS review, but are still awaiting comments as of the date of this letter. As indicated in the DEIS, SHPD was a consulted party in the environmental review of this project. SHPD was provided a copy of the EISPN and DEIS during the public comment periods for these phases of the project's environmental review. This also provided SHPD with an opportunity to review the CIA report. Unfortunately, SHPD did not provide comments during the public comment periods for either of these phases. Our project team will continue following up with SHPD on their review of the AIS so that it can be finalized or at least SHPD comments can be included with the final submittal and acceptance of the petition by the LUC. In any event, the project's effects on historic and cultural resources have been addressed in Sections 4.1 and 4.2 of the DEIS to facilitate the commission's review of the project under their decision making criteria.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

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

Scott Ezer, Principal

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



UNIVERSITY  
of HAWAII®  
MĀNOA

September 11, 2018

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

Ronald A. Sato:

This is to acknowledge receipt of your letter for review of an Environmental Assessment.

Unfortunately, the Water Resources Research Center does not have the capacity to review the environmental impact statement at this time due to the faculty position vacancy.

While we continue to explore filling the current vacancy, the Center will exclude itself from commentary on this specific environmental assessment study.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darren T. Lerner".

Darren T. Lerner, PhD  
Interim Director





March 29, 2019

Dr. Darren T. Lerner, Interim Director  
Environmental Center c/o Water Resources Research Center  
University of Hawai'i  
2540 Dole Street, Holmes Hall 283  
Honolulu, Hawai'i 96822

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

Dear Dr. Lerner:

Thank you for the September 11, 2018 letter acknowledging receipt of the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (italicized).

*Unfortunately, the Water Resources Research Center does not have the capacity to review the environmental impact statement at this time due to the faculty position vacancy. While we continue to explore filling the current vacancy, the Center will exclude itself from commentary on this specific environmental assessment study.*

Response: We acknowledge that the Water Resources Research Center (WRRRC) was unable to review the DEIS provided due to insufficient staffing capacity at the WRRRC and was unable to provide comments on the DEIS.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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




October 11, 2018

KIRK CALDWELL, MAYOR

BRYAN P. ANDAYA, Chair  
KAPUA SPROAT, Vice Chair  
DAVID C. HULIHEE  
KAY C. MATSUI  
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Manager and Chief Engineer

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

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

Dear Mr. Sato:

Subject: Your Letter Dated September 8, 2018 Requesting Comments on the Draft Environmental Impact Statement for the Hawaiian Memorial Park Cemetery Expansion Project off Kamehameha Highway in Kaneohe  
Tax Map Key: 4-5-033: 001

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Thank you for the opportunity to comment on the proposed cemetery 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.

Water conservation measures are recommended for all proposed developments. These measures include utilization of nonpotable water for irrigation using rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation systems, such as a drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.

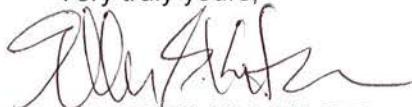
When water is made available, the applicant will be required to pay our Water System Facilities Charges for resource development, transmission, and daily storage.

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

The construction drawings should be submitted for our review, and the construction schedule should be coordinated to minimize impact to the water system.

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





March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Lau:

Thank you for the October 11, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (*italicized*) that have been numbered.

- 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.*

Response: We acknowledge your determination that the City's water system is adequate to accommodate the Proposed Action. Buildings are not proposed by this project. Therefore, building permit approval is not required. However, plans would be coordinated with your agency for review as part of the design phase and grading permit process. We understand the final decision regarding water availability will be confirmed as part of this review.
- Water conservation measures are recommended for all proposed developments. These measures include utilization of nonpotable water for irrigation using rain catchment, drought tolerant plants, xeriscape landscaping, efficient irrigation systems, such as a drip system and moisture sensors, and the use of Water Sense labeled ultra-low flow water fixtures and toilets.*

Response: The City's existing potable water system will service the irrigation system for the cemetery expansion area. Given Kāneʻohe's wet climate, irrigation needs should be minimal and should not adversely impact the City's potable water system. Rain catchment components would not be incorporated in the cemetery expansion area irrigation system as water is available from the City's potable water system. Additionally use of the cemetery expansion area for burial plots presents space limitations that render rain catchment infeasible. Implementation of water efficient components would be considered in the design of the proposed irrigation system. Xeriscape landscaping and use of drought tolerant plants is not proposed as irrigation needs are

minimal due to Kāneʻohe's wet climate. Improvements such as restrooms are not proposed that would benefit from implementation of high efficiency water fixtures and toilets.

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.*

Response: The applicant would pay the water system facilities charges for resource development, transmission, and daily storage when water is made available.

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

Response: 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.

5. *The construction drawings should be submitted for our review, and the construction schedule should be coordinated to minimize impact to the water system.*

Response: Construction drawings and the project construction schedule would be coordinated with your agency for review as part of the project's design phase to minimize impacts to the City's water system.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

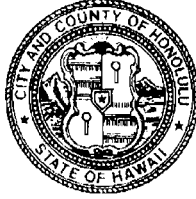


Scott Ezer, Principal

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](http://www.honolulu.gov/dcs)



KIRK CALDWELL  
MAYOR

PAMELA A. WITTY-OAKLAND  
DIRECTOR

REBECCA J. I. SOON  
DEPUTY DIRECTOR

October 18, 2018

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

Dear Mr. Sato:

SUBJECT: Draft Environmental Impact Statement (DEIS)  
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' Draft Environmental Impact Statement (DEIS) for the Hawaiian Memorial Park Cemetery Expansion Project.

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

Sincerely,  
  
Pamela A. Witty-Oakland  
Director

PWO:ta

cc: Scott Derrickson  
State of Hawaii, Land Use Commission  
Department of Business, Economic Development & Tourism



March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Ms. Witty-Oakland:

Thank you for the October 18, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (italicized).

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

Response: We acknowledge the Department of Community Services' 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 DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with the first name "Scott" being more legible than the last name "Ezer".

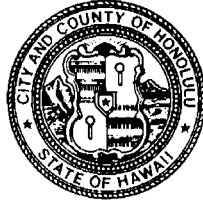
Scott Ezer, Principal

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 18-573

September 20, 2018

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

Dear Mr. Sato:

Subject: Draft Environmental Impact Statement for  
Hawaiian Memorial Park Cemetery Expansion  
Project

Thank you for the opportunity to review and comment on the subject project.

We have no comments at this time, as we do not have any facilities or easements on the subject project.

If you have 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.  
Director and Chief Engineer





March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāne'ohe, O'ahu, Hawai'i

Dear Mr. Sasamura:

Thank you for the September 20, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (*italicized*).

*We have no comments at this time, as we do not have any facilities or easements on the subject project.*  
Response: We acknowledge your department does not have any comments at this time as your department does not have any facilities or easements on the subject project.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with the first name "Scott" being more legible than the last name "Ezer".

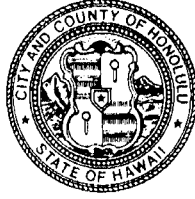
Scott Ezer, Principal

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

DEPARTMENT OF PLANNING AND PERMITTING  
**CITY AND COUNTY OF HONOLULU**

650 SOUTH KING STREET, 7<sup>TH</sup> FLOOR • HONOLULU, HAWAII 96813  
PHONE: (808) 768-8000 • FAX: (808) 768-6041  
DEPT. WEB SITE: [www.honolulu.gov](http://www.honolulu.gov) • CITY WEB SITE: [www.honolulu.gov](http://www.honolulu.gov)

KIRK CALDWELL  
MAYOR



KATHY K. SOKUGAWA  
ACTING DIRECTOR

TIMOTHY F. T. HIU  
DEPUTY DIRECTOR

EUGENE H. TAKAHASHI  
DEPUTY DIRECTOR

October 23, 2018

2018/GEN-26(ry)

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

Dear Mr. Sato:

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

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

We have the following comments:

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

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

2. Koolau Poko Sustainable Communities Plan (KPSCP):

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

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

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

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

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

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

Very truly yours,



Dina L.T. Wong  
Acting Division Chief  
Planning Division

DLTW:ah

cc: Land Use Commission

1648797





March 29, 2019

Ms. Kathy Sokugawa, Acting Director  
Department of Planning and Permitting  
City & County of Honolulu  
650 S. King Street, 7<sup>th</sup> Floor  
Honolulu, HI 96813

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

Dear Ms. Sokugawa:

Thank you for the October 23, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your numbered comments (italicized).

1. *DEIS Section 2.4 Listing of Permits and Approvals:*
  - a. *A drain connection permit is required.*

Response: This permit has been added to the list of permits as indicated below:

    - **Drain Connection Permit**
  - b. *A dewatering permit may be required.*

Response: This permit has been added to the list of permits as indicated below:

    - **Dewatering Permit (If Applicable)**
  - c. *The designation of the conservation easement should be processed through the Department of Planning and Permitting (DPP), Subdivision Branch.*

Response: Designation of the conservation easement has been added to the list of permits to be processed with DPP. However, the easement would ultimately be recorded with the State Bureau of Conveyances.

    - **Conservation Easement Designation**
  - d. *A slope stability analysis should be provided for preliminary grading.*

Response: A slope stability analysis report would be included as part of the grading plans submitted to DPP for review during the project's design phase. However, such an analysis report does not need to be listed as a separate permit under Section 2.4.

- e. *A slope hazard evaluation in accordance with Section 14-14.2(d)(2) of the Revised Ordinances of Honolulu will be required at the time the grading permit application is submitted to the DPP.*

Response: A slope hazard evaluation report would be included as part of the grading permit application submitted to your department for review during the project's design phase. However, such an evaluation report does not need to be listed as a separate permit under Section 2.4.

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

Response: Design plans for the proposed project would comply with the current City rules relating to water quality and storm drainage standards. As discussed in Section 2.2.2 of the DEIS, preliminary plans incorporate measures and best management practices from the City's new administrative rules on water quality (August 2017).

2. *Koolau Poko Sustainable Communities Plan (KPSCP):*

- a. *The proposed cemetery expansion is inconsistent with bullet number 5 under guidelines for cemeteries, page 3-19, of the KPSCP which states: "Any proposed expansion by Hawaiian Memorial Park must include a 150-foot buffer from residential homes, a 2,000-foot buffer from the Pohai Nani senior living community, and a phased approach to sales and marketing to ensure that the land adjacent to the residential home on Lipalu Street is the last portion of land used for cemetery interment, in order to minimize potential impacts to neighboring residents." The proposed expansion is only about 1,350 feet away from the Pohai Nani (PN) senior living community when measured from the PN parcel boundary and about 1,700 feet from the PH residential tower.*

Response: We believe that the buffer areas planned with the cemetery expansion plan are consistent with the KPSCP because it meets the intent of the policies and guidelines established under that plan. A more detailed explanation supporting this position is provided below.

- A. The buffer areas identified in the KPSCP are intended to serve as guidelines, which are being met by proposed plans. The mean distance from the center of the Pohai Nani residential tower to the edge of the proposed cemetery expansion area is about 1,900 feet and is thus consistent with the 2,000-foot buffer guideline.

Under Section 6-1509 of the City Charter, development plans (including SCPs) consist of "conceptual schemes" for implementing and accomplishing the development objectives and policies of the City's general plan. Further, these plans are to describe the desired urban character and the significant natural, scenic and cultural resources for the several parts of the city to a degree which is sufficient to serve as a "policy guide" for more detailed zoning maps and regulations. Consistent with the City Charter, Ordinance 17-42 adopting the KPSCP states (Section 1) that the plan presents a "vision" for future development consisting of "policies, guidelines, and conceptual schemes that will serve as a policy guide" for public and private sector investment decisions. Section 24-6.2 (Applicability and intent) further explains that the provisions of the KPSCP are not regulatory. SCPs are established with the explicit intent of "providing a coherent vision to guide" all new public and private sector development, and are not deemed to

be regulatory. Discussion of the buffer areas for HMP is subsequently included under the heading of "Guidelines for cemeteries."

Consequently, the approximately 1,900-foot buffer distance is consistent with this guideline, which identifies a 2,000-foot buffer. Under Section 24-6.5 of the Ordinance, the City Department of Planning and Permitting (DPP) has the authority to determine whether a proposed development is consistent with the KPSCP. This decision needs to primarily take into consideration the extent to which the development is consistent with the vision, policies, and guidelines set forth in the plan. The information included in the DEIS along with these responses should provide sufficient rationale justifying this determination by DPP.

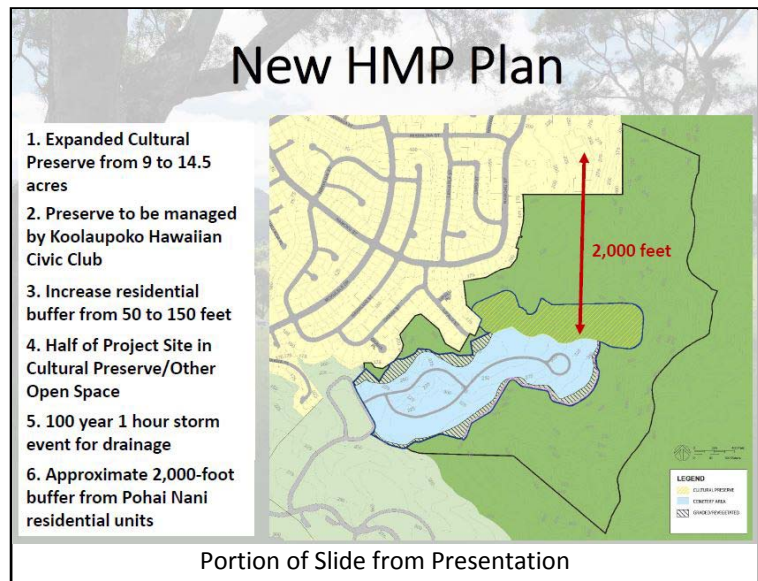
- B. Buffer area distances in the KPSCP were based upon general conceptual plans and information submitted to the City Council during the KPSCP update process. The purpose for revising initial concept plans throughout this process was to address "visual concerns" expressed by Pohai Nani residents even though private views are not protected by any State or City statutes. We understand DPP has consistently supported this position over the years. For example, an adjacent homeowner could construct a new dwelling that would block a neighbors prior views, without interference by government. The 2,000-foot buffer language was included by the Council Planning and Transportation committee based upon conceptual plans provided to the committee that stated the distance was approximate (see Response B.5 below). Throughout the process, correspondence and testimony from DPP supported the project, even with the cemetery expansion up to the Pohai Nani property line, with elimination of the housing component, and then with revised concept plans showing an approximate buffer distance. The extensive vegetation and trees that would remain within the buffer area, under the conservation easement, further provides a visual buffer from the cemetery expansion. Therefore, based upon these several factors, current project plans reflect the intent to meet the buffer guideline expressed in the SCP. Background information on the plan revisions and actions occurring during the SCP update process is provided to clarify the guideline nature of the buffer area proposed and project consistency with this guideline.
1. The original SCP amendment application for HMP filed in April 29, 2009 included a conceptual plan that had the cemetery expansion extending further east up to the Pohai Nani property line. It is noted that even with this expansion area, an August 26, 2010 letter from DPP acknowledged the application filing, and indicated an inclination to look favorably on this request because cemeteries filled an island-wide need.
  2. Project conceptual plans have since been revised to address community concerns expressed during the SCP update process. Updated plans provide a large buffer area from Pohai Nani to address residents visual concerns. Reducing the expansion nearest Pohai Nani resulted in the need to include mauka areas on the west end of the property to be used for the cemetery expansion to meet the approximately 28 acres allowed by language in the SCP.
  3. At the City Council Transportation and Planning Committee (TPC) Special Meeting of February 1, 2017, the Petitioner provided a brief overview of the current proposal, included as Communication M-409 under the meeting minutes. The



current project plans addressed community concerns by stating the cemetery expansion would not obstruct views from Pohai Nani and mausoleums would not be built (addressing views). The buffer zone from the Pikoiloa homes below the site was increased from 50 to 150 feet. The City DPP further stated at the meeting that they supported HMP's expansion that did not include any housing.

4. The Petitioner later submitted a June 9, 2017 memo to the Council TPC with a revised conceptual plan that: 1) proposed only 28.2 acres for cemetery expansion; 2) would establish a Cultural Preserve and create a conservation easement over the property; and 3) proposed an approximate 2,000-foot buffer from the Pohai Nani tower that would provide visual mitigation for its residents.

5. A Powerpoint presentation given by HHF at the Council TPC's August 1, 2017 meeting (Communication M-3552) included a slide showing the buffer area from Pohai Nani (See Exhibit). As shown, the buffer distance extended from the center of



the Pohai Nani residential tower up to the cemetery expansion, and not from their property line. Further, bullet No. 6 of the slide stated it is an **approximate** buffer.

6. The extensive vegetation and tall trees remaining within this buffer area, to be preserved by the future conservation easement, would further screen views of the cemetery expansion, supporting the intent to create a visual buffer from Pohai Nani.
7. The project plans in the DEIS reflect a configuration necessary to create a cemetery expansion providing for the 28.2 acres that is provided for under the KPSCP's cemetery guidelines. Based upon this plan, the mean average distance from the eastern end of the cemetery expansion to the center of Pohai Nani's tower is about 1,900 feet. Therefore, project plans meet the purpose, intent and general buffer distance guideline under the KCSCP.

*In addition, as the 2,000-foot buffer guideline was established to address concerns of the PN community with respect to the proximity of burials to their residences, the proposed cultural preserve where traditional Hawaiian burials are being sought is only 1,400 feet from the PN tower.*

Response: The buffer from Pohai Nani in the KPSCP was intended for the cemetery expansion of HMP as shown on plans provided during the SCP update process. Burials within the Cultural Preserve would be conducted as part of traditional native Hawaiian cultural practices following traditional protocols as discussed in Section 2.2.4 of the DEIS. Deceased individuals buried within the Cultural Preserve would not be subject to HMP requirements necessitating caskets in concrete containers. Traditional native Hawaiian protocols for burials would follow the “clean burial” process that involves partial cremation approved under State law enacted in 2015. Furthermore, such burials would not be visible from Pohai Nani due to the extensive trees and vegetation within the Cultural Preserve blocking any views of such burials. The Preserve would not be cleared. Therefore, the buffer area is not applicable to this Preserve and there would be no visual issues associated with Pohai Nani.

- b. *The DEIS did not discuss other cemetery guidelines of the KLSCP relating to how the proposed expansion addresses very low lot coverage ratios, limiting above-grade structures to grave markers of modest size, and the type and size of necessary administrative and maintenance support buildings, which are to be minimally visible from public rights-of-way, entries, and vista points.*

Response: Section 6.2.2.3 of the FEIS will be revised to include specific discussion of the project’s consistency with the low lot coverage ratios. A copy of these revisions is attached to this letter. In general, the cemetery expansion would support this guideline of maintaining the open space character of cemeteries. No mausoleums would be constructed, supporting an open space character with just memorial monuments (e.g. grave markers) that would be of modest size. Further, there are no support buildings proposed within the cemetery expansion as discussed in Section 6.2.2.3.

- c. *A draft copy of the conservation easement for the 156-acre undeveloped portion of Tax Map Key: 4-5-033: Parcel 001 should be included in the Final Environmental Impact Statement.*

Response: A draft copy of the conservation easement is not necessary for the FEIS because development of such a document is premature at this stage of the process. Details regarding a private conservation easement agreement are not needed to further address project impacts in the FEIS enabling the decision-maker to consider the environmental factors involved and to make a reasoned decision. The details of this easement would be developed between the Petitioner and Hawaiian Islands Land Trust (HILT) upon reclassification approval of this project. It is highly likely a requirement to execute a conservation easement would be a condition of approval by the Land Use Commission should they vote to approve the Petition. HILT has indicated they are not interested in developing an agreement until the LUC takes final action on the Petition.

Ms. Kathy Sokugawa, Acting Director  
City Department of Planning and Permitting

Page 6

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Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Ezer". The signature is written in a cursive, flowing style.

Scott Ezer, Principal

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

# ATTACHMENT - FINAL EIS REVISIONS

## CITY DPP - COMMENT 2b

impact downstream natural resources or result in additional hazard such as increased flood risk. The project will not impact recreational facilities in the surrounding area or authorized public recreational use of the site that would occur. The project visual analysis discussed in Chapter 4 indicates that the project will not impact visual resources associated with the Petition Area. The proposed Cultural Preserve will provide authorized members of the public with expanded opportunities for education on Preserve cultural resources.

### ***Section 3.1.3.4 Cemeteries, Natural Gulches, Streams and Drainageways Guidelines:***

- Maintain the open space character of the cemeteries through very low lot coverage ratios.

Discussion: The proposed project would be consistent with this policy because it will maintain the open space character of the Petition Area. The expanded cemetery would have a very low lot coverage ratio. The expanded cemetery does not include buildings or other structures (e.g. restrooms) that would increase lot coverage. The proposed project includes only internal roadways and burial plots with grave markers that would cover small areas. The Cultural Preserve would similarly not include any buildings or structures affecting lot coverage ratios. Therefore, the density of cemetery expansion would be minimal and maintain an open space character consistent with cemeteries.

- Limit above-grade structures to grave markers of modest size; and necessary administrative and maintenance support buildings that are minimally visible from public rights-of-way, entries and vista points.

Discussion: As previously discussed, the expanded cemetery would consist of normal grave markers. Administrative and maintenance support structures are not proposed in the Petition Area as part of this project. Thus, the project would be consistent with this policy.

- Where direct, indirect, or cumulative impacts of any proposed cemetery expansion will affect rare, threatened, or endangered species; or where direct, indirect, or cumulative impacts of any proposed cemetery expansion on sensitive areas are identified in any environmental setting; measures to mitigate, reduce, or rectify any adverse impacts shall be formulated.

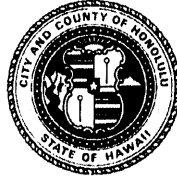
Discussion: The presence of rare, threatened, or endangered species within the Petition Area was evaluated as discussed in Section 2.2. In particular, a seep in the western portion of the Petition Area functions as a habitat for the endangered Blackline Hawaiian Damselfly. This area along the seep would be preserved and is not included in grading plans. Additional design and minimization measures have been proposed to ensure continued flow of subsurface water to this seep (e.g. subsurface drains) and to prevent current damage occurring from feral pigs as discussed in Sections 2.2 and 3.5. As a result, the project would not negatively impact the seep or the damselfly habitat. The direct, indirect, and cumulative impacts from cemetery expansion are addressed in Chapters 3 and 7, and show there would not be significant effects on listed species.



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

September 24, 2018

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

Dear Mr. Sato:

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

In response to your letter dated September 8, 2018, regarding the abovementioned subject, the Honolulu Fire Department (HFD) 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; 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; 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

Mr. Ronald Sato, AICP  
Page 2  
September 24, 2018

- 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 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; 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; 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](mailto:wmasuda@honolulu.gov).

Sincerely,



SOCRATES D. BRATAKOS  
Assistant Chief

SDB/TC:bh

cc: Scott Derrickison, State of Hawaii  
Land Use Commision



March 29, 2019

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  
Draft Environmental Impact Statement (DEIS)  
TMK: (1) 4-5-033: por. 001 (Private Property)  
Kāneʻohe, Oʻahu, Hawaiʻi

Dear Mr. Bratakos:

Thank you for the September 24, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your numbered comments (italicized).

- 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; 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; 2012 Edition, Section 18.2.3.2.1.).*

Response: The project does not propose development of buildings or facilities requiring compliance with uniform fire code building and door access regulations. However, access roads proposed in the cemetery expansion area will facilitate access for emergency support vehicles.
- 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 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; 2012 Edition, Section 18.3.1, as amended.).*

Response: The project does not propose development of buildings or facilities requiring access to an approved water supply for fire protection.



3. *The unobstructed width and unobstructed vertical clearance of a fire apparatus access road shall meet county requirements. (NFPA 1; 2012 Edition, Sections 18.2.3.4.1.1 and 18.2.3.4.1.2, as amended.).*

Response: Dimensioning requirements (width and vertical clearance) for City fire access roads would be incorporated into the design of proposed site improvements, as applicable.

4. *Submit civil drawings to the HFD for review and approval.*

Response: Civil engineering drawings developed during the project design phase would be coordinated with the Honolulu Fire Department, as appropriate.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

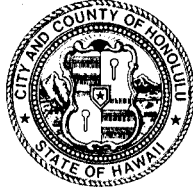
A handwritten signature in black ink that reads "Scott Ezer". The signature is written in a cursive, flowing style.

Scott Ezer, Principal

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 EO-TS

September 24, 2018

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

Dear Mr. Sato:

This is in response to your letter of September 8, 2018, requesting comments on the Draft Environmental Impact Statement for the proposed Hawaiian Memorial Park (HMP) Cemetery Expansion project located in the Kaneohe District, Oahu.

The Honolulu Police Department (HPD) recommends that all necessary signs, lights, barricades, and other safety equipment be installed and maintained by the contractor to facilitate the flow of traffic into HMP by way of Kamehameha Highway during the construction phase of the project. Furthermore, the HPD concurs with the proposed traffic mitigation measure of striping the westbound approaches of HMP's two driveways to delineate a shared left/through and separate right turn lane to reflect current operating roadways.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Allan T. Nagata", is written over a horizontal line.

ALLAN T. NAGATA  
Assistant Chief  
Support Services Bureau

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



March 29, 2019

Mr. Allan T. Nagata, Assistant Chief, Support Services Bureau  
Honolulu Police Department  
City & County of Honolulu  
801 S. Beretania Street  
Honolulu, HI 96813

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

Dear Mr. Nagata:

Thank you for the September 24, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (*italicized*) that have been numbered.

1. *The Honolulu Police Department (HPD) recommends that all necessary signs, lights, barricades, and other safety equipment be installed and maintained by the contractor to facilitate the flow of traffic into HMP by way of Kamehameha Highway during the construction phase of the project.*  
Response: During the project's construction phase, the contractor will install and maintain necessary safety equipment such as signage, lighting, and barricades to facilitate the flow of traffic from Kamehameha Highway into the project area.
2. *Furthermore, the HPD concurs with the proposed traffic mitigation measure of striping the westbound approaches of HMP's two driveways to delineate a shared left/through and separate right turn lane to reflect current operating roadways.*  
Response: We acknowledge your concurrence with the proposed traffic mitigation measure involving striping of the westbound approaches of HMP's driveways to reflect current operating roadways.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer".

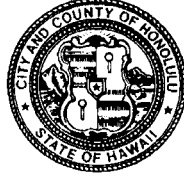
Scott Ezer, Principal

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

DEPARTMENT OF DESIGN AND CONSTRUCTION  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 11<sup>TH</sup> FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8480 • Fax: (808) 768-4567  
Web site: [www.honolulu.gov](http://www.honolulu.gov)

KIRK CALDWELL  
MAYOR



ROBERT J. KRONING, P.E.  
DIRECTOR

MARK YONAMINE, P.E.  
DEPUTY DIRECTOR

September 26, 2018

HHF Planners  
ATTN: Ronald Sato  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813

Dear Mr. Sato,

Subject: Hawaiian Memorial Park Cemetery Expansion Project

Thank you for the opportunity to review and comment. The Department of Design and Construction does not have any comments at this time.

Should you have any further questions, please call me at 768-8480.

Sincerely,

A handwritten signature in black ink, appearing to read "R. J. Kroning".

Robert J. Kroning, P.E.  
Director



March 29, 2019

Mr. Robert J. Kroning, P.E., Director  
Department of Design and Construction  
City and County of Honolulu  
650 S. King Street, 11th Floor  
Honolulu, Hawai'i 96813

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

Dear Mr. Kroning:

Thank you for the September 26, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (italicized).

*The Department of Design and Construction does not have any comments at this time.*

Response: We acknowledge that the Department of Design and Construction does not have any comments at this time.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with the first name "Scott" and the last name "Ezer" clearly legible.

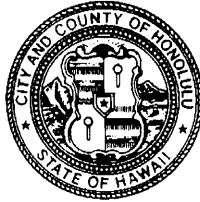
Scott Ezer, Principal

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

DEPARTMENT OF PARKS & RECREATION  
**CITY AND COUNTY OF HONOLULU**

1000 Uluohia Street, Suite 309, Kapolei, Hawaii 96707  
Phone: (808) 768-3003 • Fax: (808) 768-3053  
Website: www.honolulu.gov

KIRK CALDWELL  
MAYOR



MICHELE K. NEKOTA  
DIRECTOR

JEANNE C. ISHIKAWA  
DEPUTY DIRECTOR

September 13, 2018

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

Dear Mr. Sato:

**SUBJECT: Draft Environmental Impact Statement - Hawaiian Memorial Park  
Cemetery Expansion Project**

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for the subject cemetery expansion project.

The Department of Parks and Recreation has no comment. As the project will have no impact on any program or facility of the Department, you may remove us as a consulted party to the balance of the EIS process.

Should you have any questions, please contact John Reid, Planner at 768-3017.

Sincerely,

A handwritten signature in black ink that reads "Michele K. Nekota". The signature is fluid and cursive.

Michele K. Nekota  
Director

MKN:jr  
(743115)

cc: Scott Derrickson, Land Use Commission



March 29, 2019

Ms. Michele K. Nekota, Director  
Department of Parks & Recreation  
City and County of Honolulu  
1000 Uluohia Street, Suite 309  
Kapolei, Hawai'i 96707

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

Dear Ms. Nekota:

Thank you for the September 13, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses corresponding to your comments (*italicized*) that have been numbered.

*The Department of Parks and Recreation has no comment. As the project will have no impact on any program or facility of the Department, you may remove us as a consulted party to the balance of the EIS process.*

Response: We acknowledge your department has no comments for the project as the project will not impact any Department of Parks & Recreation programs or facilities. As requested, we will remove your department as a consulted party on the balance of the EIS process.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

Ellen L. Akaka  
45-442 'Ohaha Street  
Kane'ohe, Hawai'i 96744

HHF Planners  
733 Bishop Street, Ste 2590  
Honolulu, Hawai'i

Dear Mr. Sato,

I am writing in regard to the proposed Hawaiian Memorial Park Cemetery Expansion Project which has, over the years, caused great consternation for those of us who live adjacent to the cemetery. The concerns remain the same as in the past and, in fact, as more research has been done, have grown to include other issues. We echo our concerns for all of those issues. I will not reiterate those concerns as I know that you have received many letters about them. I am going to focus strictly on an issue which has affected us, and continues to, specifically.

In our specific instance, we have severe concerns about flooding and property damage as have been experienced over the years and to which we have never received adequate answers. We purchased our home, new, in 1964 and, in the first six months were hit with severe flooding which emanated from the cemetery area. Our 'Ohaha Street home abuts the Hawaiian Memorial Park property which, now, includes the Veteran's Cemetery. Over the years we have had numerous incidents of run-off coming down a steep slope and into our yard, surrounding the house with thick mud which has often been within an inch or less of coming into the house. We have graded the yard several times to encourage the water and mud away from the house and toward the edges of the property but it is only by virtue of good luck and help from friends and neighbors that we have avoided catastrophe.

On February 18 of this year there was a severe storm which caused an enormous amount of thick mud to rush down our back hill, again, and came within an inch of entering the house. We called the Fire Department, late at night, who arrived to find my 79 year old husband and our daughter digging a trench at the edge of our yard to redirect the water and mud. Fortunately the rain finally slowed down enough that we avoided a catastrophe. At least four other homes had water damage in their houses as well. I do not know if their damage was covered by insurance.

I called the cemetery who, again said it was not their responsibility, it was due to problems from the Veteran's Cemetery. Representative Ken Ito, who has, until recently, always been helpful in the past, spoke to both parties who apparently blamed each other, and that seemed to be where the issue ended. I have not heard from him since that time even with repeated phone calls. I was unable to get a connection with someone at the Veteran's cemetery in the event of future problems. The City and County, apparently, came and cleaned out the swale at the edge of our property. I have as yet to receive a contact number, or even a courtesy call, from the Veteran's



Cemetery. I can only foresee continual problems along these lines. As your plans continue I can only imagine more of these "incidents" with no resolution.

And that is just from one home. Consider that along with all the other issues that have been brought up regarding this newest proposal from HMP. We are reaching an age that we will likely need to sell our home. That will likely be difficult with the addition of these proposed changes.

This, as you can see, has been an on-going problem for over 50 years and it has caused extreme stress to all the parties affected. I can only foresee the proposed cemetery changes as adding to the ongoing issues.

Sincerely,

A handwritten signature in black ink that reads "Ellen L. Akaka". The signature is written in a cursive, flowing style.

Ellen L. Akaka

Copy to: Mr. Scott Derrickson



March 29, 2019

Ms. Ellen L. Akaka  
15-442 'Ohaha Street  
Kāne'ohe, HI 96744

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

Dear Ms. Akaka:

Thank you for the undated letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project that was postmarked on October 22, 2018. We have provided responses corresponding to your comments (italicized) that have been numbered.

1. *I am writing in regard to the proposed Hawaiian Memorial Park Cemetery Expansion Project which has, over the years, caused great consternation for those of us who live adjacent to the cemetery. The concerns remain the same as in the past and, in fact, as more research has been done, have grown to include other issues. We echo our concerns for all of those issues. I will not reiterate those concerns as I know that you have received many letters about them. I am going to focus strictly on an issue which has affected us, and continues to, specifically.*

Response: We acknowledge your opposition to the project proposing to reclassify the Petition Area to the Urban District allowing for the expansion of the cemetery and creation of a cultural preserve. We also acknowledge that you have the same concerns as in the past (2008 FEIS), however, the current project has incorporated several measures since then which have adequately addressed those prior concerns, including flooding from grading activities, impacts on Kāwā Stream and water quality, cultural sites, and visual resources.

2. *In our specific instance, we have severe concerns about flooding and property damage as have been experienced over the years and to which we have never received adequate answers. We purchased our home, new, in 1964 and, in the first six months were hit with severe flooding which emanated from the cemetery area. Our 'Ohaha Street home abuts the Hawaiian Memorial Park property which, now, includes the Veteran's Cemetery. Over the years we have had numerous incidents of run-off coming down a steep slope and into our yard, surrounding the house with thick mud which has often been within an inch or less of coming into the house. We have graded the yard several times to encourage the water and mud away from the house and toward the edges of the property but it is only by virtue of good luck and help from friends and neighbors that we have avoided catastrophe.*

Response: Section 5.3.1 of the DEIS addresses current flooding conditions and states that a system of swales along the subdivision designed by engineers representing the developer in the 1960s collects and conveys stormwater. Prior inspection of these swales suggests they were poorly maintained and did not function well. This system was designed to meet current, undeveloped

conditions within the Petition Area for the 10-year, 1-hour storm. Any flooding of your residence in 1964 was due to existing conditions associated with the undeveloped hillside, and not associated with the HMP cemetery developed at that time. Based upon the location of your residence, any current and past flooding events are not attributable to HMP or the veterans cemetery given their existing drainage basins (Section 3.6) that discharge to a different area. Therefore, flooding issues on your property are likely due to the existing undeveloped hillside immediately upslope from your property and the inability of the drainage system to manage storm water.

3. *On February 18 of this year there was a severe storm which caused an enormous amount of thick mud to rush down our back hill, again, and came within an inch of entering the house. We called the Fire Department, late at night, who arrived to find my 79 year old husband and our daughter digging a trench at the edge of our yard to redirect the water and mud. Fortunately the rain finally slowed down enough that we avoided a catastrophe. At least four other homes had water damage in their houses as well. I do not know if their damage was covered by insurance.*

Response: There was a severe storm event on February 18, 2018 that was documented in a water quality study conducted and discussed in Section 3.7.1 of the DEIS. That storm event likely exceeded the 10-year, 1-hour storm, overwhelming the drainage system and causing flooding of your residence.

4. *I called the cemetery who, again said it was not their responsibility, it was due to problems from the Veteran's Cemetery. Representative Ken Ito, who has, until recently, always been helpful in the past, spoke to both parties who apparently blamed each other, and that seemed to be where the issue ended. I have not heard from him since that time even with repeated phone calls. I was unable to get a connection with someone at the Veteran's cemetery in the event of future problems. The City and County, apparently, came and cleaned out the swale at the edge of our property. I have as yet to receive a contact number, or even a courtesy call, from the Veteran's Cemetery. I can only foresee continual problems along these lines. As your plans continue I can only imagine more of these "incidents" with no resolution.*


Response: Your comments regarding personal contacts and discussions with former Representative Ito and the Veterans Cemetery should be more appropriately directed to them. As already discussed, drainage from HMP and the Veterans Cemetery do not discharge into the City's drainage system serving your residence. As discussed in the DEIS, the engineering analysis incorporated within the project's preliminary design would accommodate the 100-year storm event instead of the 10-year storm event. The analysis indicates that the velocity and volume of runoff from the Petition Area would decrease with project implementation due to the reduction in site slopes from grading improvements reducing the speed stormwater travels downslope and allowing additional time for stormwater infiltration. The grassed cemetery expansion would further decrease runoff velocity, increase stormwater infiltration, and reduce erosion and soils presently being discharged. Project drainage improvements that include onsite retention/detention basins would detain water on site, allowing pollutants and debris time to settle before stormwater flows offsite.

5. *And that is just from one home. Consider that along with all the other issues that have been brought up regarding this newest proposal from HMP. We are reaching an age that we will likely need to sell our home. That will likely be difficult with the addition of these proposed changes. This, as you can see, has been an on-going problem for over 50 years and it has caused extreme stress to all the parties affected. I can only foresee the proposed cemetery changes as adding to the ongoing issues.*

Response: Concerns associated with the project have been addressed in respective sections of the DEIS. Any decision to sell your home would be your own decision. As discussed in prior responses and information from the DEIS, flooding issues over the past 50 years are not based upon existing developed areas of HMP or the Veterans Cemetery because they do not discharge into your property. Current flooding issues are primarily due to the design of drainage improvements designed only for a 10-year storm event for runoff from the undeveloped hillside. Project improvements would improve drainage conditions and reduce current flooding.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

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

Scott Ezer, Principal

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



Puanani Akaka  
PO Box 62125  
Honolulu, HI 96839

October 19, 2018


To Whom It May Concern:

I am writing in response to the Hawaiian Memorial Park Expansion EIS plan. With so much concern over expanding the cemetery into conservation land, the increased possibility and worry over future flooding should development be allowed (especially in the wake of climate change and increasing potential of damage from more powerful storms and rain events), as well as concern over the protection of the ancient Hawaiian Kawa`ewa`e heiau site and complex, I am moved to wonder whether there is extensive evidence that Hawaiian Memorial Park has actively researched and, indeed, offered alternative burial practices and methods that are environmentally friendly and require little to no further land requirements.

As I understand it, Hawaiian Memorial Park's claim for pushing the cemetery into conservation land and causing so much anxiety for local residents, is because "they are running out of room." Since the Honolulu City and County's decision to turn down Hawaiian Memorial Park's expansion application a decade ago, is there any evidence that Hawaiian Memorial Park has bothered to research burial methods that do not require new land acquisition? Is there evidence that they have given serious and exhaustive consideration to alternative burial methods that would create less pollution, less flooding concerns, require little to no new land, and keep intact the integrity of conservation areas and habitats? Perhaps they have done the research yet soundly rejected them on reasonable grounds, such as any and all new methods create more pollution than traditional methods or create a dangerous flooding situation for areas downstream? As I recall, a number of people who testified at those previous hearings all those years ago offered quite a number of alternatives that were eco-friendly and made effective use of the current land space. Has Hawaiian Memorial Park actively researched and since offered to customers any eco-friendly, space-effective alternatives to traditional burials that would effectively eliminate or, at the very least, minimize the amount of new land needed and make more effective use of what they have available? As an entity who claims to "be a good neighbor", it

seems to me that having been denied the option of expanding the cemetery, it would behoove them to look at alternatives. Otherwise, it certainly looks on the face of it, that they were then simply biding their time in the hopes of trying their luck with the State of Hawai'i. That is not the behavior of an entity who claims to be a "good neighbor" to their residential neighbors who have serious concerns about this expansion plan. Finding alternative methods that make better use of the current space seems the best course of action for all parties. It is more cost-effective for the cemetery and minimizes, or, at best, eliminates the concerns over development, flooding, pollution and the high potential of irreparable and unnecessary damage to ancient Hawaiian cultural sites and conservation areas and habitats. It would be a win for all.

Mahalo.



Puanani Akaka



March 29, 2019

Ms. Puanani Akaka  
PO Box 62125  
Honolulu, HI 96839

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

Dear Ms. Akaka:

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

1. *I am writing in response to the Hawaiian Memorial Park Expansion EIS plan. With so much concern over expanding the cemetery into conservation land, the increased possibility and worry over future flooding should development be allowed (especially in the wake of climate change and increasing potential of damage from more powerful storms and rain events), as well as concern over the protection of the ancient Hawaiian Kawa 'ewa 'e heiau site and complex, I am moved to wonder whether there is extensive evidence that Hawaiian Memorial Park has actively researched and, indeed, offered alternative burial practices and methods that are environmentally friendly and require little to no further land requirements.*

Response: The appropriateness of reclassifying the Petition Area's State Conservation District designation is discussed in Section 6.1.1, of the DEIS and noted these areas were previously designated for "Residential," "Low Density Apartment," and "Agricultural" uses. As discussed in the DEIS, the engineering analysis incorporated within the project's preliminary design would accommodate the 100-year storm event instead of the 10-year storm event that is required by the City's grading regulations. Analysis (Appendix D of the DEIS) indicates that the velocity and volume of runoff from the Petition Area would decrease with implementation of the project, increase stormwater infiltration, and reduce erosion and soils presently being discharged. Drainage improvements that include onsite retention/detention basins would detain storm water on site, allowing pollutants and debris time to settle before offsite discharge. Climate change was addressed in Section 3.2.5. Creation of the cultural preserve would support restoration and management of Kawa'ewa'e Heiau by the Ko'olaupoko Hawaiian Civic Club and facilitate on-going cultural practices. Section 2.1 addresses the need for the project, and discusses methods of disposition with the vast majority of choice continuing to be via burial or cremation. In addition, there is the heritage factor and memorialization considerations for families. Long-term cultural practices emphasize the importance of these types of burials.



2. *As I understand it, Hawaiian Memorial Park's claim for pushing the cemetery into conservation land and causing so much anxiety for local residents, is because "they are running out of room."*

Response: Section 2.1 of the DEIS discusses the purpose for the project and objectives in detail. "Running out of room" is certainly a business issue. However, the importance of continuing to provide burial choices for O'ahu families is a major driving force for the project. HMP has the infrastructure necessary to provide these opportunities that will allow families to be interred in proximity to other family members.

3. *Since the Honolulu City and County's decision to turn down Hawaiian Memorial Park's expansion application a decade ago, is there any evidence that Hawaiian Memorial Park has bothered to research burial methods that do not require new land acquisition? Is there evidence that they have given serious and exhaustive consideration to alternative burial methods that would create less pollution, less flooding concerns, require little to no new land, and keep intact the integrity of conservation areas and habitats? Perhaps they have done the research yet soundly rejected them on reasonable grounds, such as any and all new methods create more pollution than traditional methods or create a dangerous flooding situation for areas downstream? As I recall, a number of people who testified at those previous hearings all those years ago offered quite a number of alternatives that were eco-friendly and made effective use of the current land space.*

Response: Other suggested alternative burial practices at prior hearings held on the previous proposal in 2009 were thought by proponents to be more environmentally friendly and less space intensive, which is not the case. Suggestions raised included "green burials" and implementation of burial practices occurring at Swiss cemeteries. Green burials encompass a variety of burial practices and necessitate the use of non-toxic or biodegradable materials for burial items (i.e. caskets and shrouds). Use of these materials allow a deceased individual and the material the individual is buried in to decompose into the surrounding soil. Proponents believe green burials are better for the environment as they require fewer burial items (i.e. caskets) and can be more affordable as embalming and expensive burial items are not required. However, green burials would still require additional burial plots. Furthermore, green burials would violate State Department of Health (DOH) regulations (HAR Title 11, Chapter 22) governing cemetery operations. These regulations are intended to prevent unhygienic conditions or dangers to public health from cemetery operations. Corpse decomposition may release pathogens into the surrounding soil and may contaminate the environment leading to violation of these regulations. Thus, this alternative burial practice is not appropriate, violates State regulations, and would be more environmentally damaging.

4. *Has Hawaiian Memorial Park actively researched and since offered to customers any eco-friendly, space-effective alternatives to traditional burials that would effectively eliminate or, at the very least, minimize the amount of new land needed and make more effective use of what they have available?*

Response: Some Swiss cemeteries rent burial plots to families for a set period (i.e. 25 years) rather than offering fee simple ownership. Once the rental period elapses, interred corpses are exhumed with associated burial items (e.g. caskets and headstones) and are recycled or disposed of. Exhumed bones are then relocated to mass gravesites allowing the formerly occupied grave to be reused. Proponents of this practice note that it provides a practical means of accommodating casketed burials in locations where space is limited. Such burial practices have not been implemented at HMP as exhumation of an interred corpse may result in transmission of decay materials to the surrounding environment. This would also violate State DOH regulations intended to prevent public health issues related to dangerous cemetery operations. Exhumation and disposal of family members into a mass gravesite is not culturally appropriate or accepted, there is no available mass grave site on O'ahu to use, and this practice does not serve the memorialization and heritage factors desired by families.

Therefore, such alternative burial methods are not reasonable or practicable, would not support the project's purpose and need, and would create more environmental issues from that currently proposed. The proposed project would improve drainage conditions within the Petition Area and would not create a dangerous flooding condition for downstream areas, and is an appropriate use of this privately-owned property. Improvements would not significantly impact any important habitat, as discussed in Chapter 3, and would not adversely impact the Conservation District designation (Section 6.1). Section 2.5 addressed other alternatives considered, and explains why they were eliminated based upon reasonable grounds with justification.

5. *As an entity who claims to "be a good neighbor", it seems to me that having been denied the option of expanding the cemetery, it would behoove them to look at alternatives. Otherwise, it certainly looks on the face of it, that they were then simply biding their time in the hopes of trying their luck with the State of Hawai'i. That is not the behavior of an entity who claims to be a "good neighbor" to their residential neighbors who have serious concerns about this expansion plan.*

Response: The Petitioner has clearly demonstrated they are being a good neighbor by modifying initial plans from 2008, and incorporating design elements that minimize effects and addressing prior concerns. The cultural preserve would support native Hawaiian cultural practices, stewardship, and management and restoration of cultural sites. A proposed conservation easement would cover the 156.5-acre property as discussed in Section 2.2.5, and prevent future development of the area. Current plans have gained the support of several organizations and individuals, and the DEIS addressed environmental effects, all of which has resulted in a reasonable and beneficial project for consideration by the Land Use Commission. We disagree with your assertion of the Petitioner's behavior toward surrounding residences, and believe the project and minimization measures discussed adequately address concerns.

6. *Has Finding alternative methods that make better use of the current space seems the best course of action for all parties. It is more cost- effective for the cemetery and minimizes, or, at best, eliminates the concerns over development, flooding, pollution and the high potential of irreparable and unnecessary damage to ancient Hawaiian cultural sites and conservation areas and habitats. It would be a win for all.*

Response: Alternative methods using the current HMP cemetery is not feasible or practicable based upon the purpose and need for this project discussed in Section 2.1, and is not the best course of action for the Petitioner to meet the future needs of families and the broader island community. As already discussed, concerns with development, flooding, pollution, cultural sites, and conservation areas and habitats have been addressed by the project and are adequately discussed in the DEIS.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

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

Scott Ezer , Principal

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

## Ronald Sato

---

**From:** Kilolani Akiu <kilolani.akiu@gmail.com>  
**Sent:** Tuesday, October 23, 2018 5:46 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Hawaiian Memorial Park

To Whom It May Concern:

I strongly feel that this project is definitely a need for the community and island of Oahu for the future and is well managed and maintained.

Mahalo,  
Kilolani Akiu

Sent from my iPhone

This message has been scanned for viruses and dangerous content using Worry-Free Mail Security and is believed to be clean.



March 29, 2019

Ms. Kilolani Akiu  
Kilolani.akiu@gmail.com

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

Dear Ms. Akiu:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*I strongly feel that this project is definitely a need for the community and island of Oahu for the future and is well managed and maintained.*

Response: We acknowledge your opinion that the project is needed for the community and the island of Oʻahu and is well managed and maintained. Your support for this project is appreciated.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

## Ronald Sato

---

**From:** Ryse Akiu <ryseakiu@gmail.com>  
**Sent:** Tuesday, October 23, 2018 11:00 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Hawaiian Memorial Park

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.

--

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March 29, 2019

Mr. Ryse Akiu  
ryseakiu@gmail.com

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

Dear Mr. Akiu:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.*

Response: We acknowledge your opinion that the project will provide a unique opportunity to support the native Hawaiian community as well as a living culture and cultural practices.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

## Ronald Sato

---

**From:** Reyn Akiu <reynakiu@hawaii.edu>  
**Sent:** Tuesday, October 23, 2018 3:42 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Tita Akiu- statement

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Aloha,

The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.

Mahalo

--

This message has been scanned for viruses and dangerous content using [Worry-Free Mail Security](#), and is believed to be clean. [Click here to report this message as spam.](#)





March 29, 2019

Ms. Reyn Akiu  
reynakiu@hawaii.edu

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

Dear Ms. Akiu:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.*

Response: We acknowledge your opinion that the project will provide a unique opportunity to support the native Hawaiian community as well as a living culture and cultural practices.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

October 23, 2013

Dr. Charles K. and Clara Burrows  
05-090 Namoku St. Cottage N  
Kaneohe, HI 96744

HHF Planners  
733 Bishop St., Suite 2590  
Honolulu, Hawaii 96813  
Attention: Ronald A. Sato, AICP, Senior Associate  
Email: [rsato@hhf.com](mailto:rsato@hhf.com)

Copy Sent To: State of Hawaii Land Use Commission  
Department of Business, Economic Development & Tourism  
P.O. Box 2359  
Honolulu, HI 96804  
Attention: Mr. Scott Derrickson  
Email: [scott.a.derrickson@hawaii.gov](mailto:scott.a.derrickson@hawaii.gov)

Hawaiian Memorial Park Cemetery Expansion Project  
Kaneohe District, Oahu, Hawaii  
(1) 4-5-033 por. 0001 (Private Property)

Dear Sir,

I am responding to the Draft Environmental Impact Statement (DEIS) of August 30, 2018 and published for the subject project with intent to solicit public review and comments on the project. I also understand that a petition was submitted to the Land Use Commission by the Hawaiian Memorial Life Plan, Ltd. to reclassify the boundaries of the State Land Use Conservation District into the State Urban District of about 53.5 acres of their private property covering Tax Map Key No. (1)-4-5-033: por. 001. This will allow the petitioner to expand their cemetery to 28 acres for a 30,000 in-ground burial and cremation inurnment site on their current 80 acres of cemetery operations. The remaining 25 acres of the petitioned 53.5 acres will be used for internal roadways, 150-foot buffer between the homes of the neighboring community and the proposed cemetery, the

construction of retention walls to prevent the rapid flow of storm waters, and the isolation and protection of a recently discovered Hawaiian Damselfly seepage habitat.

I am also aware that due to concerns, complaints and opposition to the initial 2007 and 2009 HMP Cemetery expansion plans, the current revised and down scaled 2017 DEIS HMP Cemetery Expansion Project has compromised and addressed the environmental and cultural impacts of the earlier proposals. I would like to comment that as a Hawaiian cultural practitioner and an environmental educator who has worked to conserve and restore the natural and cultural resources in Kailua (Kawainui-Hamakua wetlands and in Maunawili Valley), on Kaho'olawe Island and other places, I was opposed to the HMP 2007-2009 cemetery expansion plans. In the late 1990's with the Queen Emma Hawaiian Civic Club and with then City Councilman Steve Homes, I assisted in restoring Kawa'ewa'e Heiau because of its relationship origins to Ali'i Olopana who also founded Pahukini and Holomakani heiau in Kailua.

I am pleased that the HMP Petitioner incorporated into the DEIS HMP Cemetery Expansion Project the recommendations to designate 130 acres as a Conservation Easement and 14.5 acres as a cultural preserve for a total of approximately 145 acres where no urban type of development can occur in perpetuity but only preservation, conservation and restoration projects can occur, such as, removing alien invasive foliage and replacing with Hawaiian endemic and indigenous trees and vegetation. This also includes a 2,000-foot buffer zone between the Pohai Nani Retirement Facility and the proposed cemetery burial ground. It is significant that an entry pathway can be from the proposed cemetery roadway thus avoiding the current entry to Kawa'ewa'e Heiau from Lipalu St.

As current residents at the Pohai Nani Good Samaritan Retirement Community in Kaneohe since March 2017, my wife Clara Burrows and I (Charles K. Burrows) support the petition for the HMP Cemetery Expansion Project to have the LUC reclassify the conservation zoning to urban zoning on their 53 acres property providing that the FEIS uses the Best Management Practices in its development and that the community, environmental and cultural concerns are adhered to.



We will with the Pohai Nani resident community follow the process towards the development of the final EIS and participate in the LUC's public hearing to offer further responses and input.

As the current chair of the Pohai Nani Green Team, I will be recommending that the Pohai Nani Green Team and/or Ka Hui o Pohai Nani (Resident Association) submit a written statement with justified reasons to support or oppose the HMP Cemetery Expansion Project.

When the Land Use Commission makes its decision to approve or disapprove the HMP cemetery expansion petition at a date in 2019, then the Pohai Nani Green Team could take the following actions:

\*If the petition is not approved by the LUC, then it will remain at the current conditions. I will recommend that the Pohai Nani residents and administration support the Ko'olaupoko Hawaiian Civic Club morally, monetarily and physically in the efforts to malama (care for) Kawa'ewa'e Heiau with HMP.

\*If the petition is approved by the LUC, I will recommend that the Pohai Nani Green Team take the lead with the Pohai Nani Administration and Ka Hui o Pohai Nani to have a partnership with the Hawaiian Islands Land Trust and the HMP to malama part of the property (number of acres to be determined) adjacent to Pohai Nani to construct walking trails, remove alien invasive trees and plant Hawaiian endemic and indigenous trees and plants which the Pohai Nani Green Team is currently doing at Pohai Nani as part of its environmental sustainability concept landscape plan.

Our mahalo and appreciation for the planning that has been done by HHF, the advisory consultants and Hawaiian Memorial Life Plan, Ltd. to develop this latest DEIS HMP Cemetery Expansion Project.

Dr. Charles K. and Clara Burrows, Pohai Nani residents

*Mr. Charles K. Burrows - Clara Burrows*

45-090 Namoku St. Cottage N, Kaneohe, HI 96744

<[chuckkb@gmail.com](mailto:chuckkb@gmail.com)> 808-595-3922





March 29, 2019

Dr. Charles K. and Clara Burrows  
05-090 Namoku St. Cottage N  
Kāneʻohe, HI 96744

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

Dear Dr. and Mrs. Charles Burrows:

Thank you for your October 23, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments (italicized).

1. *I am responding to the Draft Environmental Impact Statement (DEIS) of August 30, 2018 and published for the subject project with intent to solicit public review and comments on the project. I also understand that a petition was submitted to the Land Use Commission by the Hawaiian Memorial Life Plan, Ltd. to reclassify the boundaries of the State Land Use Conservation District into the State Urban District of about 53.5 acres of their private property covering Tax Map Key No. (1) - 4-5-033: por. 001. This will allow the petitioner to expand their cemetery to 28 acres for a 30,000 in-ground burial and cremation inurnment site on their current 80 acres of cemetery operations. The remaining 25 acres of the petitioned 53.5 acres will be used for internal roadways, 150-foot buffer between the homes of the neighboring community and the proposed cemetery, the construction of retention walls to prevent the rapid flow of storm waters, and the isolation and protection of a recently discovered Hawaiian Damsel fly seepage habitat.*

Response: The project description discussed in your comment is consistent with the DEIS.

2. *I am also aware that due to concerns, complaints and opposition to the initial 2007 and 2009 HMP Cemetery expansion plans, the current revised and down scaled 2017 DEIS HMP Cemetery Expansion Project has compromised and addressed the environmental and cultural impacts of the earlier proposals. I would like to comment that as a Hawaiian cultural practitioner and an environmental educator who has worked to conserve and restore the natural and cultural resources in Kailua (Kawainui-Hamakua wetlands and in Maunawili Valley), on Kahoʻolawe Island and other places, I was opposed to the HMP 2007-2009 cemetery expansion plans. In the late 1990's with the Queen Emma Hawaiian Civic Club and with then City Councilman Steve Homes, I assisted in restoring Kawa'ewa'e Heiau because of its relationship origins to Ali'i Olopana who also founded Pahukini and Holomakani heiau in Kailua.*

Response: The current concept for the proposed project considered the concerns and issues associated with the previously proposed plans. We acknowledge your opposition to the previous cemetery expansion plans, and appreciate your efforts to restore Kawa'ewa'e Heiau. This heiau will

be located within the proposed Cultural Preserve. Establishment of the preserve area will further aid efforts to restore Kawa'ewa'e Heiau and the surrounding cultural landscape.

3. *I am pleased that the HMP Petitioner incorporated into the DEIS HMP Cemetery Expansion Project the recommendations to designate 130 acres as a Conservation Easement and 14.5 acres as a cultural preserve for a total of approximately 145 acres where no urban type of development can occur in perpetuity but only preservation, conservation and restoration projects can occur, such as, removing alien invasive foliage and replacing with Hawaiian endemic and indigenous trees and vegetation. This also includes a 2,000-foot buffer zone between the Pohai Nani Retirement Facility and the proposed cemetery burial ground. It is significant that an entry pathway can be from the proposed cemetery roadway thus avoiding the current entry to Kawa'ewa'e Heiau from Lipalu St.*

Response: We appreciate your support for current project plans establishing a Conservation Easement on the surrounding property and creating a Cultural Preserve. The Conservation Easement would apply to about 156 acres of the total property, which is larger than the 130 acres stated in your comment. The cemetery expansion and Cultural Preserve would be allowable uses within the easement. A buffer zone would be established between the Pohai Nani residential tower and expanded HMP cemetery to serve as a visual buffer and ensure activities within the cemetery expansion would not be disruptive to Pohai Nani residents. It should be clarified that establishment of the 2,000 foot buffer discussed in the City's *Ko'olau Poko Sustainable Communities Plan (SCP)* is a guideline for the proposed cemetery expansion project. The SCP serves as guidance for this project, but is not prescriptive as to how the project must be designed in order to be compliant with the SCP. Therefore, the project's design and development of construction plans would determine the actual distance serving as a buffer. However, the average distance between the Pohai Nani residential tower and the cemetery expansion area is roughly 1,900 feet. We acknowledge your preference that the entry pathway to the Cultural Preserve extend from the cemetery roadway rather than from the end of Lipalu Street. As stated in the DEIS (Section 2.2.4), the exact location and route of this access would be determined as part of final project grading plans.

4. *As current residents at the Pohai Nani Good Samaritan Retirement Community in Kaneohe since March 2017, my wife Clara Burrows and I (Charles K. Burrows) support the petition for the HMP Cemetery Expansion Project to have the LUC reclassify the conservation zoning to urban zoning on their 53 acres property providing that the FEIS uses the Best Management Practices in its development and that the community, environmental and cultural concerns are adhered to.*

Response: We appreciate your support of the project, and best management practices, minimization measures, and mitigative measures, if required, are identified in the DEIS that would be incorporated in design plans and construction activities.

5. *We will with the Pohai Nani resident community follow the process towards the development of the final EIS and participate in the LUC's public hearing to offer further responses and input. As the current chair of the Pohai Nani Green Team, I will be recommending that the Pohai Nani Green Team and/or Ka Hui o Pohai Nani (Resident Association) submit a written statement with justified reasons to support or oppose the HMP Cemetery Expansion Project.*

Response: Thank you for your participation in this environmental review process by offering comments and input. We appreciate the Pohai Nani Green Team and/or Ka Hui o Pohai Nani's participation in the upcoming LUC hearing for this project.

6. *When the Land Use Commission makes its decision to approve or disapprove the HMP cemetery expansion petition at a date in 2019, then the Pohai Nani Green Team could take the following actions:*

*\*If the petition is not approved by the LUC, then it will remain at the current conditions. I will recommend that the Pohai Nani residents and administration support the Ko'olaupoko Hawaiian Civic Club morally, monetarily and physically in the efforts to malama (care for) Kawa'ewa'e Heiau with HMP.*

*\*If the petition is approved by the LUC, I will recommend that the Pohai Nani Green Team take the lead with the Pohai Nani Administration and Ka Hui o Pohai Nani to have a partnership with the Hawaiian Islands Land Trust and the HMP to malama part of the property (number of acres to be determined) adjacent to Pohai Nani to construct walking trails, remove alien invasive trees and plant Hawaiian endemic and indigenous trees and plants which the Pohai Nani Green Team is currently doing at Pohai Nani as part of its environmental sustainability concept landscape plan. Our mahalo and appreciation for the planning that has been done by HHF, the advisory consultants and Hawaiian Memorial Life Plan, Ltd. to develop this latest DEIS HMP Cemetery Expansion Project.*

Response: We note your suggestions of options the Pohai Nani Green Team could take depending upon the results of the LUC hearings and action. The Ko'olaupoko Hawaiian Civic Club would appreciate the residents' support for their efforts. With LUC approval, Pohai Nani's internal organization could coordinate with the Hawaiian Islands Land Trust in developing mutual partnerships for the caring of the areas remaining in preservation (e.g. removing invasive vegetation). However, walking trails within the preservation area is not being considered at this time due to potential liability issues, security and unauthorized access, and other possible concerns (e.g. safety). Thank you for appreciating the planning work conducted for this project.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,



Scott Ezer, Principal

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





## Ronald Sato

---

**From:** M R <my\_other\_addy@hotmail.com>  
**Sent:** Wednesday, October 10, 2018 4:40 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Hawaiian Memorial Park Cemetery expansion

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Upon review of the DEIS for the expansion of the Cemetery, I feel that it fully addresses concerns of the local community. Also, since I have family buried at the cemetery, I want to be reassured that future burial sites will be available.

Mahalo,  
Lisa M Cabanting

--

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March 29, 2019

Ms. Lisa M. Cabanting  
my\_other\_addy@hotmail.com

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

Dear Ms. Cabanting:

Thank you for your October 10, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (italics).

*Upon review of the DEIS for the expansion of the Cemetery, I feel that it fully addresses concerns of the local community. Also, since I have family buried at the cemetery, I want to be reassured that future burial sites will be available.*

Response: We acknowledge your assessment that the project DEIS fully addresses the concerns of the local community. Project cemetery expansion improvements will provide additional burial space, ensuring families can plan for future interment near relatives already interred at HMP.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Ezer, Principal

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

## **Testimony in Support of Hawaiian Memorial Park**

To: Land Use Commission

Subject: Support for Hawaiian Memorial Park Expansion

Date: Tuesday, October 23, 2018

I had the opportunity to review Hawaiian Memorial Park's plan and feel that expanding the cemetery is an important project needed by the State of Hawaii. Hawaiian Memorial Park is a well-managed cemetery in a convenient location for families to visit loved ones adjacent to the Hawaii State Veterans Cemetery. Families deserve to have a choice on their final disposition. There is a lot of diversity in Hawaii and many people have different values, beliefs, and traditional practices. Hawaiian Memorial Park has existed since the 1950s and has generations of families buried there. Future generations should have the opportunity to have their families together.

Please support this company and the expansion.

Mahalo,  
Earl Canada

Honolulu, HI



March 29, 2019

Mr. Earl Canada  
earlca00@gmail.com

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

Dear Mr. Canada:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*I had the opportunity to review Hawaiian Memorial Park's plan and feel that expanding the cemetery is an important project needed by the State of Hawaii. Hawaiian Memorial Park is a well-managed cemetery in a convenient location for families to visit loved ones adjacent to the Hawaii State Veterans Cemetery. Families deserve to have a choice on their final disposition. There is a lot of diversity in Hawaii and many people have different values, beliefs, and traditional practices. Hawaiian Memorial Park has existed since the 1950s and has generations of families buried there. Future generations should have the opportunity to have their families together.*

Response: We appreciate your support of this project and acknowledge your belief that the project is needed in the State of Hawaiʻi. We concur that Hawaiian Memorial Park (HMP) is well managed and conveniently located, allowing families to visit loved ones in nearby cemeteries such as the Hawaiʻi State Veterans Cemetery. We agree that Hawaiʻi residents should have the opportunity to be buried in the same locations where deceased family members are already interred. As such, the proposed project will provide additional burial space that will increase disposition and memorialization options for Hawaiʻi residents.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

October 22, 2018

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

Dear Mr. Sato:

I am writing to you in regards to the Hawaiian Memorial Park Cemetery Expansion Project. I live on Ohaha Street and will be directly affected by this expansion. I oppose the project because of several concerns that I have about the expansion. My main concerns are: the noise and dust that will be stirred up during your grading of the hillside and then filling in the trenched areas with soil and rocks to make it flatter and more suitable for burying the deceased, flooding and run off, and destruction of the natural flora and fauna and green space of this beautiful hillside which is deemed Preservation and Conservation land.

I own 2 plots in Hawaiian Memorial Park Cemetery – 1 of which I chose to have my parents interned in (both my mother and father are buried there now) and the other is vacant. I also own 4 plots at Mililani Memorial Park which are also vacant. I know longer have use for my 5 vacant plots since my husband and I choose to be cremated upon our passing. I have several relatives and friends who also have plots at Hawaiian Memorial Park who also wish to be cremated and NOT interned into the ground. I honestly cannot remember when was the last time that I attended a funeral where there was a body on view then interment into the ground. I have several questions to HHF:

1) You say that there is a need for more land to bury our deceased and that is why you need to expand the cemetery and destroy our hillside. **Has your company and Hawaiian Memorial Park Cemetery considered the number of people who own plots and don't plan to use it for themselves and want to sell them to others who may want to bury someone who is not cremated? Did you send out a letter to those who own plots currently not used and ask them what they plan to do with their plots?**

2) I understand that there is a limit as far as how many bodies/cremated remains can be buried in one plot at Hawaiian Memorial Park. **If I wanted to put 10 urns in a burial plot (plus or minus a casket), whose management decision would it be to allow that? What are the "rules" for the number of urns that can be placed into one plot (with or without a casket)?**

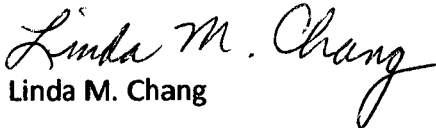
3) My husband has COPD and often needs nebulizer treatments when he starts wheezing badly or has shortness of breath. This is exacerbated by dust, dander, pollen, vog, and respiratory illnesses. **How do you plan to control the dust and tree, grass, and weed pollen that will be disturbed and will be dispersed by the wind? We actually live downhill from the proposed expansion area and are very much concerned about my husband's respiratory condition and how it will be affected by the construction.**

4) I'm really worried about the possibility of water overflowing from the proposed "retention ponds" that I understand you will be putting in. This is, as I understand, supposed to prevent water run off down the hillside and flooding. The wai will flow where it naturally wants to go. Kane'ohe and in particular, this hillside where you plan to expand the cemetery, is lush and green for a reason – it rains a lot! Dengue fever is a concern with any potentially stagnant bodies of water.

**What guarantees do I have from you that my home and the homes immediately below this expansion area will NOT be flooded and will NOT be in danger from water run off when it rains? Further, what are you going to do to control the mosquitoes that you will be "incubating" in these ponds? If flooding or a landslide should happen, will I be compensated for any damage that occurs?**

I look forward to your responses to my questions. You can address your responses to:  
Ms. Linda M. Chang; 45-431 Ohaha Street; Kane'ohe, HI 96744.

Mahalo for your time,

  
Linda M. Chang

Cc: Mr. Scott Derrickson, Land Use Commission



March 29, 2019

Ms. Linda M. Chang  
45-431 Ohaha Street  
Kāneʻohe, Hawaiʻi 96744

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

Dear Ms. Chang:

Thank you for your October 22, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments (*italicized*).

1. *I am writing to you in regards to the Hawaiian Memorial Park Cemetery Expansion Project. I live on Ohaha Street and will be directly affected by this expansion. I oppose the project because of several concerns that I have about the expansion. My main concerns are: the noise and dust that will be stirred up during your grading of the hillside and then filling in the trenched areas with soil and rocks to make it flatter and more suitable for burying the deceased, flooding and run off, and destruction of the natural flora and fauna and green space of this beautiful hillside which is deemed Preservation and Conservation land.*

Response: We acknowledge your opposition to the project noting you live on Ohaha Street in the vicinity of the project site. Several of your concerns are discussed later under your numbered responses.

- a. Regarding noise, as discussed in Section 4.5 of the DEIS, construction activities would inevitably generate noise volumes that would be audible at nearby residences. The actual sound levels experienced will vary during activities, and are a function of the distance from the noise source and sound attenuation (topography, vegetation structures). Typical noise levels would vary between 80 to 90 dBA from 50 feet away, and decreases with distance (-6 dBA when doubling distance). The address for the home listed in the letter is about 500 feet away from nearest construction activities. At this distance, construction noise would decrease about 20 dBA, and other existing homes adjacent to the project site would further shield and reduce noise. In comparison, existing noise along Kamehameha Highway was estimated to be 70 dBA. In addition, the majority of grading activities would occur well away from Ohaha Street, further minimizing noise disturbances. None of this noise would be high enough to cause hearing loss or interfere with verbal communication at your residence. Further, State Department of Health noise regulations would be followed, and a noise permit would have further restrictions.
- b. Our later response to Comment 2d which addresses flooding and runoff concerns discussed in this comment.
- c. The Petition Area presently consists of an alien forest primarily comprised of introduced plant species that would be significantly altered by grading improvements. Therefore, as discussed in



Section 3.3, the project would not impact Federal or State-listed threatened or endangered plant species or species of concern. The project is not expected to adversely impact endangered or threatened fauna as discussed in Section 3.4 as the majority of species present are alien. Although the project would change the naturally vegetated character of the Petition Area, the resulting turf grass landscaping would still serve as a form of greenspace as discussed in Section 4.7. Native plants would also be used in the landscaping of this area as appropriate. Finally, the appropriateness of reclassifying the Petition Area's State Conservation District designation is discussed in Section 6.1.1, and it is noted these areas were previously designated for "Residential," "Low Density Apartment," and "Agricultural" uses.

2. *I own 2 plots in Hawaiian Memorial Park Cemetery - 1 of which I chose to have my parents interned in (both my mother and father are buried there now) and the other is vacant. I also own 4 plots at Mililani Memorial Park which are also vacant. I know longer have use for my 5 vacant plots since my husband and I choose to be cremated upon our passing. I have several relatives and friends who also have plots at Hawaiian Memorial Park who also wish to be cremated and NOT interned into the ground. I honestly cannot remember when was the last time that I attended a funeral where there was a body on view then interment into the ground. I have several questions to HHF:*

Response: The disposition of family members is a personal choice and HMP provides opportunities for families to select disposition methods and memorialization. Section 2.1 of the DEIS discusses disposition needs for the future, which includes interment. We have the following responses to your numbered questions.

- 2a. *1} You say that there is a need for more land to bury our deceased and that is why you need to expand the cemetery and destroy our hillside. Has your company and Hawaiian Memorial Park Cemetery considered the number of people who own plots and don't plan to use it for themselves and want to sell them to others who may want to bury someone who is not cremated? Did you send out a letter to those who own plots currently not used and ask them what they plan to do with their plots?*

Response: Section 2.1 discusses the need for more burial plots based upon a market study. However, we disagree that expansion of the cemetery will destroy this privately-owned hillside property based upon the results of the DEIS. It should be clarified that burial plots are also used for cremains (cremated remains). As discussed in Section 2.1, some families choose to keep urns at home or dispose of them in another manner. However, the vast majority of families continue to use burial plots for them, which supports memorialization. While there may be some people owning plots that decide to sell them or take care of disposition in another manner for various reasons, the vast majority of families utilize the burial plots purchased and does not change the overall future demand. Such actions may change where a family member is memorialized, but it does not affect the continued demand for burial plots due to the increasing and aging population on O'ahu.

It is inappropriate and insensitive to send out letters to family members to ask them what they plan to do with their plots. The disposition and memorialization of persons is a confidential family matter.

- 2b. *2) I understand that there is a limit as far as how many bodies/cremated remains can be buried in one plot at Hawaiian Memorial Park. If I wanted to put 10 urns in a burial plot (plus or minus a casket), whose management decision would it be to allow that? What are the "rules" for the number of urns that can be placed into one plot (with or without a casket)?*

Response: HMP manages the number and type of dispositions included in a burial plot. As discussed in Section 2.2.3, HMP allows a burial plot to contain two caskets or a combination of one casket and up to two urns for cremains. Burial plots containing only cremains may accommodate a maximum of four urns.

- 2c. *3) My husband has COPD and often needs nebulizer treatments when he starts wheezing badly or has shortness of breath. This is exacerbated by dust, dander, pollen, vog, and respiratory illnesses. How do you plan to control the dust and tree, grass, and weed pollen that will be disturbed and will be dispersed by the wind? We actually live downhill from the proposed expansion area and are very much concerned about my husband's respiratory condition and how it will be affected by the construction.*

Response: Fugitive dust and weed pollen emissions could result from earth moving activities as discussed in Section 4.6.2. The project does not affect dander, vog, or respiratory illnesses. To minimize such emissions, site grading must occur in phases of 5-acres or less increments. The geotechnical analysis notes existing soils would be moist to wet given the high rainfall environment surrounding the area. Therefore, these soils should result in less potential for airborne transmission of dust compared to drier soils. A dust control plan must be prepared if air quality impacts are anticipated by the project contractor. Measures to control fugitive dust emissions and any pollen that may also be transported may involve BMPs consisting of a watering program, use of windscreens, and temporary rock pavers for heavily traversed areas. As discussed in response No. 1, your residence is located about 500 feet away from nearest construction activities, and the majority of grading activities would occur well away from your residence and Ohaha Street further minimizing potential emission effects. Project plans discussed in Section 2.2 include a large vegetated buffer area that would be retained further reducing potential effects.

- 2d. *4) I'm really worried about the possibility of water overflowing from the proposed "retention ponds" that I understand you will be putting in. This is, as I understand, supposed to prevent water run off down the hillside and flooding. The wai will flow where it naturally wants to go. Kane'ohe and in particular, this hillside where you plan to expand the cemetery, is lush and green for a reason - it rains a lot! Dengue fever is a concern with any potentially stagnant bodies of water.*

Response: As discussed in Section 2.2.2, the project's preliminary drainage design would accommodate the 100-year storm event instead of the 10-year storm event required by City ordinance. In comparison, the system of swales along the subdivision collecting stormwater was designed for the 10-year, 1-hour storm. Detention basin outlets would be designed to allow complete drainage within 48 hours when full, and 24 to 36 hours when half full. Detention basins are not intended to prevent runoff as stated in your comment. They are proposed as a low impact development strategy. Runoff retention would allow infiltration of stormwater and additional time for pollutants to settle before any runoff drains off site. Detention basins would reduce the discharge volumes by an additional 3 percent for the 100-year storm event. The DEIS analysis indicates that the velocity and volume of runoff from the Petition Area would decrease with project implementation due to the reduction in site slopes from grading improvements. Reducing slope reduces the velocity of stormwater downslope and allows additional time for infiltration. The grassed cemetery expansion would further decrease runoff velocity, increase stormwater

infiltration, and reduce erosion. Dengue fever is not an issue because the detention basins are designed to drain completely.

- 2e. *What guarantees do I have from you that my home and the homes immediately below this expansion area will NOT be flooded and will NOT be in danger from water run off when it rains? Further, what are you going to do to control the mosquitoes that you will be "incubating" in these ponds? If flooding or a landslide should happen, will I be compensated for any damage that occurs?*

Response: There is no guarantee from the Petitioner that your home or other homes adjacent to the property would not be affected by stormwater resulting from a severe storm event or hurricane. The project and its drainage improvements would have a beneficial effect by improving the management of stormwater emanating from the HMP property. The existing wet alien forest with canopy trees presently harbors more mosquitoes than would occur over the grassed landscaped cemetery expansion with detention basins, and the project therefore reflects an overall improvement. The project would reduce the slope of a portion of the hillside and be grassed for the cemetery expansion, reducing the potential for landslides over current conditions. No compensation is planned for any damages to your home that may occur from flooding or other severe weather or natural hazards that may occur. Any flooding issues should be appropriately covered under your homeowner's insurance policy or flood insurance if you have acquired it.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,



Scott Ezer, Principal

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

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

Dear Mr. Sato:

I am writing to you in regards to the Hawaiian Memorial Park Cemetery Expansion Project. I live on Ohaha Street and will be directly affected by this project. I oppose the expansion because of several concerns that I have. My main concerns are: the destruction of Preservation and Conservation land - our beautiful green hillside and the laua'e patches that grow where the proposed expansion will occur, noise that we will have to tolerate and dust that will be stirred up during your grading of the hillside and then filling in the trenched areas with soil and rocks to make it flatter and more suitable for burying the deceased, flooding and run off, and Kawa'ewa'e Heiau.

1) I am a cultural practitioner of the art of hula. I am 57 years old and I have been dancing and practicing the many protocols of hula since I was 5 years old. I, along with several other haumana in hula and halaus in this area, utilize the laua'e which grow in the proposed area of expansion of Hawaiian Memorial Park. It is readily available and safely accessible and is the greenest, most fragrant laua'e I have ever seen. We practitioners of hula use this fern (along with other materials) to adorn ourselves in preparation mostly for dancing kahiko although sometimes it is also used for 'auana. In your most recent EIS, I refer to page 3-40 (Figure 3.7). It is a picture of the petition area with 3 oval areas in light green designating areas of patches of laua'e that the developers have identified. As I understand it, 2 of the patches will either be mowed over and demolished during the grading and filling that will occur or up rooted and replanted someplace else on the hillside leaving only one patch in the proposed "Cultural Preserve". I do not believe that this will be a viable plan for many reasons. **My question to you would be, are you certain that the laua'e will thrive when you uproot and replant the fern somewhere else on the hillside? Will I be guaranteed that I will be able to exercise my right as a native Hawaiian gatherer to have safe access to the one patch that now has to be shared by many in a sacred place that should not be walked on and is in a rock fall area?**

2) My father has bad asthma and COPD and often needs nebulizer treatments when he wheezes badly or has shortness of breath. This is exacerbated by dust, dander, pollen, vog, and respiratory illnesses. We actually live across the street from the proposed expansion area and are very much concerned about my dad's respiratory condition and how it will be affected by the construction. I am also concerned about the dust and pollen that will accumulate in my home. **How do you plan to control the dust and tree, grass, and weed pollen that will be disturbed and will be dispersed by the wind? How do you plan to control the noise from the demolition and grading of the hillside then filling in with rocks and dirt? Will you compensate us for any ER visits my dad may have to make and meds he will have to get refilled because of the dust and pollen in the air?**

3) I'm really worried about the possibility of water overflowing from the proposed "retention ponds" that I understand you will be putting in. This is, as I understand, supposed to prevent water run off down the hillside and flooding. The wai will flow where it naturally wants to go. Kane'ohe and in particular, this hillside where you plan to expand the cemetery, is lush and green for a reason – it rains a lot! This hillside is also a "water shed" area.

Lastly, I am a pediatrician. The mosquito borne disease, Dengue fever, is a real concern where any stagnant bodies of water exist. **What guarantees do I have from you that my home and the homes immediately below this expansion area will NOT be flooded and will NOT be in danger from water run off when it rains? Further, what are you going to do to control the mosquitoes that you will be "incubating" in these ponds? If flooding or a landslide should happen, will we be compensated for any damage that occurs?**

4) I commend Hawaiian Memorial Park (HMP) for wanting to do the pono thing by agreeing to help maintain the Kawa'ewa'e Heiau (a Nationally registered historical site) and the many other historical sites on the hillside that HMP proposes to expand upon by incorporating them into a "Cultural Preserve" therefore preserving them for generations to come. This cultural preserve will supposedly be managed and maintained by the Ko'olaupoko Hawaiian Civic Club and a third party Land Trust which HMP will designate. That being said, I question why only NOW the owners and developers of HMP decided to "be a good neighbor" and reach out to the community to help maintain these historical sites. **Will monies and man power be provided by this 3<sup>rd</sup> party entity and/or HMP for maintenance and upkeep of this Cultural Preserve? If not by the Land Trust entity or HMP, how will Ko'olaupoko get the monies and man power to maintain the Preserve?** I wonder if, had they reached out to the community about this earlier, maybe the road would not have been so rocky.

I look forward to your responses to my questions. You can address your responses to:  
Lianne M. Chang, MD; 45-431 Ohaha Street; Kane'ohe, HI 96744.

Mahalo for your time,



Lianne M. Chang, MD

Cc: Mr. Scott Derrickson, Land Use Commission



March 29, 2019

Dr. Lianne M. Chang, MD  
45-431 Ohaha Street  
Kāneʻohe, Hawaiʻi 96744

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

Dear Dr. Chang:

Thank you for your October 22, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments (*italicized*).

1. *I am writing to you in regards to the Hawaiian Memorial Park Cemetery Expansion Project. I live on Ohaha Street and will be directly affected by this project. I oppose the expansion because of several concerns that I have. My main concerns are: the destruction of Preservation and Conservation land - our beautiful green hillside and the laua'e patches that grow where the proposed expansion will occur, noise that we will have to tolerate and dust that will be stirred up during your grading of the hillside and then filling in the trenched areas with soil and rocks to make it flatter and more suitable for burying the deceased, flooding and run off, and Kawa'ewa'e Heiau.*

Response: We acknowledge your opposition to the project, noting you live on Ohaha Street in the vicinity of the project site, and have concerns with project effects. Other concerns are discussed later under your numbered comments.

- a. We disagree that the project would result in the “destruction” of Conservation land based upon the results of the DEIS. Although the project would change the character of this privately-owned hillside, the cemetery expansion and establishment of the Cultural Preserve would not have an overall adverse effect on the environment. The appropriateness of reclassifying the Petition Area’s State Conservation District designation is discussed in Section 6.1.1, and it is noted these areas were previously designated for “Residential,” “Low Density Apartment,” and “Agricultural” uses. The property is only within the Conservation District due to changes in the regulations. The City’s 1964 Detailed Land Use Map originally designated this area for residential, low density apartment, and a portion for agricultural use. Under the initial creation of Conservation Districts, there were only two subzones consisting of General Use and Restricted Watershed. This property was included under the General Use category that allowed a wide variety of urban uses, such as resort and related residences, restaurants, and recreational facilities. Finally, the project is consistent with the City’s sustainable communities plan that designates this area for urban expansion within the Community Growth Boundary.
- b. The project would significantly alter the present botanical characteristics of the alien forest dominated by introduced plant species by the cemetery’s expansion because this site

would undergo extensive grading activities (cut/fill). However, proposed improvements would not impact Federal or State-listed threatened or endangered plant species or species of concern because none were observed within the Petition Area as discussed in Section 3.3.2. The introduced fern species commonly known as Laua'e (*P. grossus*) would be impacted by grading activities within the cemetery expansion area, but not within the proposed Cultural Preserve. The endemic fern also known as Laua'e, *M. spectrum*, was not observed within the Petition Area. Seeds or cuttings from extant indigenous and endemic plants are proposed to be collected and grown to use in replanting efforts in and around the cemetery expansion area or within the Cultural Preserve to mitigate impacts.

- c. Regarding noise, as discussed in Section 4.5 of the DEIS, construction activities would inevitably generate noise volumes that would be audible at nearby residences. The actual sound levels experienced will vary during activities, and are a function of the distance from the noise source and sound attenuation (topography, vegetation structures). Typical noise levels would vary between 80 to 90 dBA from 50 feet away, and decreases with distance (-6 dBA when doubling distance). The address for the home listed in the letter is about 500 feet away from nearest construction activities. At this distance, construction noise would decrease about 20 dBA, and other existing homes adjacent to the project site would further shield and reduce noise. In comparison, existing noise along Kamehameha Highway was estimated to be 70 dBA. In addition, the majority of grading activities would occur well away from Ohaha Street, further minimizing noise disturbances. None of this noise would be high enough to cause hearing loss or interfere with verbal communication at your residence. Further, the State Department of Health regulations would be followed, and a noise permit obtained would have further restrictions.
- d. As discussed in Section 2.2.2, the project's preliminary design would accommodate the 100-year storm event instead of the required 10-year storm event. In comparison, the City-designed system of swales along the subdivision collecting stormwater was designed for the 10-year, 1-hour storm. Detention basins are proposed as a low impact development strategy as runoff retention would allow stormwater infiltration and additional time for pollutants to settle before runoff drains off site. Detention basins would reduce the discharge volumes by an additional 3 percent for the 100-year storm event. The DEIS analysis indicates that the velocity and volume of runoff from the Petition Area would decrease with project implementation due to the reduction in site slopes from grading improvements reducing the speed stormwater travels downslope and allowing additional time for stormwater infiltration. The grassed cemetery expansion would further decrease runoff velocity, increase stormwater infiltration, and reduce erosion and soils presently being discharged.
- e. The proposed Cultural Preserve would have a beneficial effect on Kawa'ewa'e Heiau by aiding further efforts to restore it and the surrounding cultural landscape, support cultural practices, and increase stewardship and management of this preserve.

2. *1) I am a cultural practitioner of the art of hula. I am 57 years old and I have been dancing and practicing the many protocols of hula since I was 5 years old. I, along with several other haumana in hula and halaus in this area, utilize the laua'e which grow in the proposed area of expansion of Hawaiian Memorial Park. It is readily available and safely accessible and is the greenest, most fragrant laua'e I have ever seen. We practitioners of hula use this fern (along with other materials) to adorn ourselves in preparation mostly for dancing kahiko although sometimes it is also used for 'auana. In your most recent EIS, I refer to page 3-40 (Figure 3.7). It is a picture of the petition area with 3 oval areas in light green designating areas of patches of laua'e that the developers have identified. As I understand it, 2 of the patches will either be mowed over and demolished during the grading and filling that will occur or up rooted and replanted someplace else on the hillside leaving only one patch in the proposed "Cultural Preserve".*

Response: We believe your comment mischaracterizes the current state of the resource and cultural access within the Petition Area. We disagree with your statement that you “along with several other haumana in hula and the hālaus (sic) in this area, utilize the laua’e which grow in the proposed area of expansion of Hawaiian Memorial Park.” As part of their Cultural Impact Assessment (CIA), Honua Consulting interviewed every known Kumu Hula and hula practitioner that utilize the area. Each interviewee was provided maps of the area. Based upon extensive interviews, only one or two Kumu Hula currently access the proposed Cultural Preserve area. Not a single individual identified the cemetery expansion area as an area accessed for cultural purposes. This present activity level is also much lower for the several hālau that used to regularly care for the laua’e groves in the Cultural Preserve area, partly due to trespassers in the area and concerns by area residents. It is also important to note that traditional access involves more than just the taking of the resource. Information from Kumu Hula specifically noted that traditional practice involved hālau caring for the area, which includes removal of invasive species and other threats to the laua’e.

We note that you were interviewed as part of the CIA and you were provided a map and opportunity to show where you access the Petitioner’s privately-owned property for laua’e. Based upon that interview, all of the area that you identified as being used will be preserved and will not be impacted by the cemetery expansion. As a result of the proposed Cultural Preserve and conservation easement, these resources would be protected in perpetuity.

*I do not believe that this will be a viable plan for many reasons. My question to you would be, are you certain that the laua'e will thrive when you uproot and replant the fern somewhere else on the hillside?*

Response: While a minimal area of laua’e may be impacted by the cemetery expansion, this area is not utilized for cultural purposes and is situated in more difficult and inaccessible locations. The Cultural Preserve would provide a greater area of laua’e and other cultural resources available for hula hālau. Such resources would be made available to Kumu Hula and cultural organizations through the Ko’olaupoko Hawaiian Civic Club, the entity that would be responsible for managing the Cultural Preserve. Therefore, the laua’e within the Preserve would continue to thrive on the hillside. All areas utilized for cultural purposes are being preserved and protected within the Cultural Preserve or conservation easement. The project strongly supports the protection and restoration of traditional practices and traditional customary practices, as identified by Kumu Hula and lineal descendants of the area.



*Will I be guaranteed that I will be able to exercise my right as a native Hawaiian gatherer to have safe access to the one patch that now has to be shared by many in a sacred place that should not be walked on and is in a rock fall area?*

Response: Cultural practitioners have requested that they retain access through Lipalu Street, which is being opposed by the residents in that community. With the project, a new access is proposed through the cemetery expansion that would provide closer vehicular access and a grassed or other designated pedestrian path extending from the internal roads. This access would potentially provide a more convenient, generally level, and accessible pedestrian path to the Cultural Preserve. Continued access from the end of Lipalu Street may be provided with the project, but may potentially be more difficult (slope) due to filling planned further mauka for cemetery expansion, and would be an inconvenient (unimproved) route for practitioners to use in the long-term. Management of the Cultural Preserve that includes access would be coordinated and determined with the Ko'olaupoko Hawaiian Civic Club as part of a Preservation Plan for the Preserve. As discussed in Section 3.2.6 of the DEIS, there is no rock fall hazard associated with the active areas proposed for use within the cultural preserve.

3. *2) My father has bad asthma and COPD and often needs nebulizer treatments when he wheezes badly or has shortness of breath. This is exacerbated by dust, dander, pollen, vog, and respiratory illnesses. We actually live across the street from the proposed expansion area and are very much concerned about my dad's respiratory condition and how it will be affected by the construction. I am also concerned about the dust and pollen that will accumulate in my home. How do you plan to control the dust and tree, grass, and weed pollen that will be disturbed and will be dispersed by the wind? How do you plan to control the noise from the demolition and grading of the hillside then filling in with rocks and dirt? Will you compensate us for any ER visits my dad may have to make and meds he will have to get refilled because of the dust and pollen in the air?*

Response: Fugitive dust emissions could result from earth moving activities as discussed in Section 4.6.2. The project does not affect dander, vog, or respiratory illnesses. To minimize such emissions, site grading must occur in phases of 5-acre increments. The geotechnical analysis notes existing soils would be moist to wet given the high rainfall environment surrounding the area. Therefore, these soils should result in less potential for airborne transmission of dust compared to drier soils. A dust control plan would be prepared if air quality impacts are anticipated by the project contractor. Measures to control fugitive dust emissions and any pollen that may also be transported may involve BMPs consisting of a watering program, use of windscreens, and temporary rock pavers for heavily traversed areas. Your residence is located about 500 feet away from nearest construction activities, and the majority of grading activities would occur well away from your residence and Ohaha Street further minimizing potential emission effects. Project plans discussed in Section 2.2 include a large vegetated buffer area that would be retained, further reducing potential effects.

Please refer to response No. 1.c. regarding noise effects, and Section 4.5.2 of the DEIS discusses measures to mitigate construction noise.

No compensation is planned for any issues associated with the existing health of your father, such as ER visits or medication. The cause resulting in the need for such services could be attributed to several factors. Furthermore, the project includes several best management practices and other design measures to minimize short-term construction effects, and would include review of construction plans by pertinent agencies as part of ministerial permits obtained.

4. *3) I'm really worried about the possibility of water overflowing from the proposed "retention ponds" that I understand you will be putting in. This is, as I understand, supposed to prevent water run off down the hillside and flooding. The wai will flow where it naturally wants to go. Kane'ohe and in particular, this hillside where you plan to expand the cemetery, is lush and green for a reason - it rains a lot! This hillside is also a "water shed" area.*

Response: Response No. 1.d. discussed drainage improvements and explained how the project would improve conditions by decreasing runoff volume, velocity, and erosion, and increasing stormwater infiltration, resulting in an overall improvement over existing conditions. Detention basins are not intended to prevent runoff from discharging downslope of the area as stated in your comment. Detention basin outlets would be designed to allow complete drainage within 48 hours when full and 24 to 36 hours when half full as discussed in Section 2.2.2. These improvements would have a beneficial effect on the associated watershed as discussed in Sections 3.6 and 3.7 by increasing stormwater infiltration, improving groundwater recharge, and reducing erosion.

5. *Lastly, I am a pediatrician. The mosquito borne disease, Dengue fever, is a real concern where any stagnant bodies of water exist.*

Response: Dengue fever is not an issue because the detention basins are designed to drain completely. Furthermore, the existing wet alien forest with canopy trees presently harbors more mosquitoes than would occur over the open grassed landscaped cemetery expansion even with detention basins. The project reflects an improvement over existing conditions related to mosquitoes.

6. *What guarantees do I have from you that my home and the homes immediately below this expansion area will NOT be flooded and will NOT be in danger from water run off when it rains? Further, what are you going to do to control the mosquitoes that you will be "incubating" in these ponds? If flooding or a landslide should happen, will we be compensated for any damage that occurs?*

Response: It is unreasonable to expect a guarantee from the Petitioner that your home or other homes adjacent to the property could not get flooded from a severe storm event or natural hazard such as a hurricane. It is inappropriate and unrealistic to expect guarantees because severe weather conditions or natural hazards are beyond control. Nevertheless, the project and drainage improvements would have a beneficial effect by improving current conditions and improving storm water runoff as discussed. Any flooding occurrences could also be attributed to the City's existing drainage system serving the subdivision.

The existing wet alien forest with canopy trees presently harbors more mosquitoes than would occur over the grassed landscaped cemetery expansion with detention basins. The project reflects an improvement as detention basins are designed to drain completely. The project would reduce the steepness of a portion of the hillside and be grassed for the cemetery expansion that would reduce the potential for landslides over current conditions. It is unreasonable to expect compensation for any damages to your home that may occur from flooding or other severe weather or natural hazards that may occur. Any flooding issues should be appropriately covered under your homeowner's insurance policy or flood insurance if you have acquired it.

7. *4) I commend Hawaiian Memorial Park (HMP) for wanting to do the pono thing by agreeing to help maintain the Kawa'ewa'e Heiau (a Nationally registered historical site) and the many other historical sites on the hillside that HMP proposes to expand upon by incorporating them into a "Cultural*

*Preserve" therefore preserving them for generations to come. This cultural preserve will supposedly be managed and maintained by the Ko'olaupoko Hawaiian Civic Club and a third party land Trust which HMP will designate. That being said, I question why only NOW the owners and developers of HMP decided to "be a good neighbor" and reach out to the community to help maintain these historical sites. Will monies and man power be provided by this 3<sup>rd</sup> party entity and/or HMP for maintenance and upkeep of this Cultural Preserve? If not by the Land Trust entity or HMP, how will Ko'olaupoko get the monies and man power to maintain the Preserve? I wonder if, had they reached out to the community about this earlier, maybe the road would not have been so rocky.*

Response: We appreciate your support for establishing the Cultural Preserve. Several changes to the previously proposed plan have been incorporated into this present project to address past issues and concerns. It has subsequently taken considerable time to work out details and establish preliminary agreements with organizations partnering on such efforts. Nevertheless, the current project has incorporated these several accommodations.

The details of managing, funding, and maintaining the Cultural Preserve would be established at a later date if this project is approved. Such details would be addressed in a Preservation Plan that would be developed at a later stage. This includes coordination with the Ko'olaupoko Hawaiian Civic Club.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

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

Scott Ezer, Principal

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

## Ronald Sato

---

**From:** Kevin <kjchar61@gmail.com>  
**Sent:** Tuesday, October 23, 2018 5:30 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Cemetery expansion

To Whom it may  
concern.

The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.

Mahalo Kevin Char

Sent from [Mail](#) for Windows 10

--

This message has been scanned for viruses and dangerous content by [MailScanner](#), and is believed to be clean.



March 29, 2019

Mr. Kevin Char  
Kjchar61@gmail.com

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

Dear Mr. Char:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*The project provides a unique opportunity to support the native Hawaiian community, to support a living culture and cultural practices.*

Response: We acknowledge your assessment that the project provides a unique opportunity to support the native Hawaiian community as well as a living culture and cultural practices.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

**From:** [Ben Santos](#)  
**To:** [DBEDT LUC](#)  
**Subject:** Hawaiian Memorial Park Support  
**Date:** Friday, October 19, 2018 6:07:31 PM

---

I support Hawaiian Memorial Park Project. The project serves an important need for families. Our community are aging and the need for additional burial plots will even be greater in the future

Ruben Cruz

[Sent from Yahoo Mail for iPad](#)



March 29, 2019

Mr. Ruben Cruz  
santosben45@ymail.com

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

Dear Mr. Cruz:

Thank you for your October 19, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*I support Hawaiian Memorial Park Project. The project serves an important need for families. Our community are aging and the need for additional burial plots will even be greater in the future*  
Response: We appreciate your support of the project and acknowledge your assessment that the project serves an important need for families. We agree with your assessment that our community is aging, leading to a pressing need for additional burial plots.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or [sezer@hhf.com](mailto:sezer@hhf.com).

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

## Ronald Sato

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**From:** Mike Deegan <dgnmic@yahoo.com>  
**Sent:** Wednesday, October 10, 2018 6:33 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** Hawaiian Memorial Park

Dear Sir or Madame,

I support the Hawaiian Memorial Park Plan for the following reasons;

- The DEIS addresses issues in a thorough manner.
- HMP addresses its commitment to the future of the community's family needs and supports the local cultural practices of the native community.
- The HMP plan also provides for long term environmental concerns and practices.

Thank you,  
Michael Deegan

[Sent from Yahoo Mail for iPad](#)

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March 29, 2019

December 18, 2018

Mr. Mike Deegan  
dgnmic@yahoo.com

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

Dear Mr. Deegan:

Thank you for your October 10, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We appreciate your support of the project, and have provided responses corresponding to your comments (*italicized*) that have been numbered.

1. *The DEIS addresses issues in a thorough manner.*  
Response: We acknowledge your assessment that the DEIS addresses issues in a thorough manner.
2. *HMP addresses its commitment to the future of the community's family needs and supports the local cultural practices of the native community.*  
Response: We agree that the future long-term needs for the disposition and memorialization of family members would be ensured with the cemetery's expansion, and the Cultural Preserve would support native Hawaiian cultural practices, stewardship, and management of this resource for the community.
3. *The HMP plan also provides for long term environmental concerns and practices*  
Response: We concur that the project's plans reflect design measures and other minimization actions that address environmental concerns being raised, and implements reasonable and effective best management practices.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

## Ronald Sato

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**From:** Deegan <kdeeg@comcast.net>  
**Sent:** Tuesday, October 23, 2018 8:53 PM  
**To:** Ronald Sato  
**Subject:** RE: DEIS

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Sent from Samsung Mobile

----- Original message -----

**From:** Deegan <kdeeg@comcast.net>  
**Date:** 10/23/2018 20:49 (GMT-10:00)  
**To:** dbedt.luc.web@hawaii.gov  
**Subject:** DEIS

Aloha:

The project is needed by the community for the future and is well managed and maintained,

Sent from Samsung Mobile

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March 29, 2019

Deegan  
kdeeg@comcast.net

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

Dear participant:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*The project is needed by the community for the future and is well managed and maintained.*

Response: We acknowledge your belief that the project is needed by the community for the future and is well managed and maintained.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

## Ronald Sato

---

**From:** Timothy Deegan <timothy\_deegan@me.com>  
**Sent:** Tuesday, October 23, 2018 8:39 PM  
**To:** dbedt.luc.web@hawaii.gov  
**Cc:** Ronald Sato  
**Subject:** DEIS

Aloha:

The DEIS is a thorough document that addresses my concerns and questions.

Mahalo,

Tim Deegan

This message has been scanned for viruses and dangerous content using Worry-Free Mail Security and is believed to be clean.



March 29, 2019

Mr. Timothy Deegan  
Timothy\_deegan@me.com

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

Dear Mr. Deegan:

Thank you for your October 23, 2018 email providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided the following responses to your comments (*italics*).

*The DEIS is a thorough document that addresses my concerns and questions.*

Response: We acknowledge your assessment that the DEIS is a thorough document that addresses your concerns and questions.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is fluid and cursive.

Scott Ezer, Principal

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

October 21, 2018

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

Attention: Ronald A. Sato, Senior Associate

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

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

I am against the Hawaiian Memorial Park Expansion.

Dudley Dias

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

45-469 Lipalu Street  
Kaneohe, HI. 96744





March 29, 2019

Mr. Dudley Dias  
45-469 Lipalu Street  
Kāneʻohe, HI 96744

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

Dear Mr. Dias:

Thank you for your October 21, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

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

Response: As discussed in Section 2.2.4 of the DEIS, activities at the Cultural Preserve would occur during daylight hours, similar to HMP's present hours. Therefore, if access from Lipalu Street is utilized, it would be during these same hours.

2. *What will be the maximum amount of people allowed at any one time?*

Response: There is no restriction planned concerning the maximum amount of people that could be allowed within the cultural preserve. The Ko'olaupoko Hawaiian Civic Club would manage this preserve in coordination with the Petitioner, and would determine the number of people participating in activities or event. Section 2.2.4 suggests that periodic larger activities may have about 20 to 30 persons participating.

3. *How will access on Lipalu Street be monitored and enforced?*

Response: Access would be for persons authorized by the civic club. With expansion of the cemetery, access to this preserve and the Lipalu Street entrance would be improved with fencing and a gate allowing HMP maintenance and other personnel to periodically inspect this access for security purposes. No enforcement issues are needed to restrict access through this street entrance. Long-term access to the preserve could also occur via an access path planned from the cemetery expansion area's internal roadway system. Access via this proposed path is preferred as the path provides a comparatively simpler and more convenient means of access relative to the Lipalu Street entrance since the path will be level and improved. Civic club members and authorized individuals who access the preserve via this path would park along the cemetery expansion area's



internal roadway system. The civic club and the Petitioner would ultimately evaluate which means of access serves as the best and most convenient method of accessing the Cultural Preserve.

4. *Where do you anticipate parking for Cultural Preserve Access on Lipalu Street?*

Response: Parking would occur within available areas of the residential subdivision along streets that currently permit public parking. However, access and parking is preferred to be located within the cemetery.

5. *I am against the Hawaiian Memorial Park Expansion.*

Response: We acknowledge your opposition to the project.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

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

Scott Ezer, Principal

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

October 9, 2018

HHF Planners

733 Bishop Street, Suite 2590

Honolulu, HI 96813

Re: Hawaiian Memorial Park Expansion

ATTENTION: Ronald Sato

Dear Mr. Sato,

In the DEIS (2-16), HMP states that there are qualitative factors that contribute to their attractiveness and marketability to O'ahu families. This is called "Heritage" and is an important part of the end of life experience and choice. Many families desire to have burial space in the same cemetery as their parents and relatives.

The cremation rate is predicted by the National Funeral Director Association to reach 84% by 2010. Also, there are currently many private sellers choosing to sell their burial plots on Craigslist and in the Star Advertiser.

**Are the proposed 30,000 burial plots for locals and kama'aina in Hawaii or will you advertise and allow wealthy international clientele to purchase burial plots, as well?**

Looking forward to your response,

A handwritten signature in blue ink that reads "Harry Franz". The signature is stylized with a large, sweeping "H" and "F".

Harry Franz

156 Kailua Road

Kailua, HI 96734





March 29, 2019

Mr. Harry Franz  
156 Kailua Road  
Kailua, HI 96734

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

Dear Mr. Franz:

Thank you for your October 9, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. *In the DEIS (2-16), HMP states that there are qualitative factors that contribute to their attractiveness and marketability to O'ahu families. This is called "Heritage" and is an important part of the end of life experience and choice. Many families desire to have burial space in the same cemetery as their parents and relatives. The cremation rate is predicted by the National Funeral Director Association to reach 84% by 2010. Also, there are currently many private sellers choosing to sell their burial plots on Craigslist and in the Star Advertiser.*  
Response: The results of the market study shows that cremations have increased from 40.4% in 2010 to 47.9% in 2015 as discussed in Section 2.1.1. That section has additional information on projected demand and method of disposition of deaths. A July 18, 2017 news release from that funeral association stated that 50.2% of Americans chose cremation in 2016.
2. *Also, there are currently many private sellers choosing to sell their burial plots on Craigslist and in the Star Advertiser.*  
Response: Whether persons wish to sell their burial plots on Craigslist or in the newspaper is a personal or family decision, and HMP has no control over such actions. Reasons for selling burial plots could vary tremendously. Regardless, there is still great interest in burial plots and memorialization.
3. *Are the proposed 30,000 burial plots for locals and kama'aina in Hawaii or will you advertise and allow wealthy international clientele to purchase burial plots, as well?*  
Response: Section 2.1.3 discusses the appropriateness of the site and absorption of burial plots based upon future trends and projected disposition of deaths in Hawaiʻi. The cemetery expansion would primarily serve Oʻahu residents because it allows family members to visit memorial sites. But the cemetery expansion could also serve families from the neighbor islands, U.S. mainland, or internationally. It is up to families to decide where members would be buried and memorialized, and HMP is open to all wanting to be located at this cemetery. However, the overwhelming majority of interest in HMP continues to be from Hawaiʻi residents. Some mainland residents, who are former Hawaiʻi residents do request burial at HMP, close to other family members.


Mr. Harry Franz

Page 2

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Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in black ink that reads "Scott Ezer". The signature is written in a cursive style with a large, stylized "S" and "E".

Scott Ezer, Principal

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

October 22, 2018

HHF Planners  
733 Bishop Street, Suite  
Honolulu, HI 96813

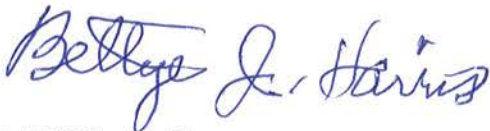
Attention: Ronald A. Sato, ACIP, Senior Associate

Please list the pesticides, herbicides and fertilizers and the amounts you distribute on the turf grass of your existing cemetery grounds. How can we be assured that the flow from the proposed cemetery into the culvert on my property won't impact the habitat for the damselfly?

During the construction and grading phase of the hillside, my residence, which is directly downhill from the proposed project, will be vulnerable to flooding and erosion in a heavy rain. I am extremely concerned that your best management practices will not be sufficient. How will you compensate us if all your best efforts fail?

I am retired and stay home during the day. All the noise, fugitive dust pollution and excavating vibrations associated with earthmoving construction will cause significant impacts on my quality of life. I am against the Hawaiian Memorial Park Expansion for these considerable reasons.

Bettye J Harris

A handwritten signature in blue ink that reads "Bettye J. Harris". The signature is written in a cursive style with a small star above the letter 'i' in "Harris".

45-170 Ohaha Place  
Kaneohe, HI. 96744





March 29, 2019

Ms. Bettye J. Harris  
45-170 Ohaha Place  
Kāneʻohe, HI 96744

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

Dear Ms. Harris:

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

- Please list the pesticides, herbicides and fertilizers and the amounts you distribute on the turf grass of your existing cemetery grounds.*

Response: HMP maintenance staff occasionally use the herbicide Roundup (glyphosate) to address spot areas needing treatment. The Petitioner indicates such use is infrequent due to the generally wet weather in Kāneʻohe, and the nature of HMP cemetery (landscaped lawn). Fertilizers are not necessary due to the generally fertile conditions, supportive weather conditions, and lower maintenance needed for turf grass, as opposed golf courses that are more dependent upon fertilizers. In addition, pesticides are not used by maintenance staff for HMP's cemetery according to the Petitioner. Therefore, it is not required or necessary to list herbicides and the amounts used to maintain the cemetery. Section 3.8 of the DEIS discusses water quality and addresses samples tested providing sufficient information on the levels of pesticides being discharged into Kāwā Stream. It should be noted that the test results suggest that the input of glyphosate into Kāwā Stream from the Veterans Cemetery and HMP's cemetery is broadly similar to the input of glyphosate from the lower residential communities that discharge runoff and pollutants into the stream.
- How can we be assured that the flow from the proposed cemetery into the culvert on my property won't impact the habitat for the damselfly?*

Response: Section 3.5 discusses the damselfly and determined the project should not significantly impact that species or its habitat. The area surrounding the seep would be preserved and various design measures discussed in Section 2.2.2 would ensure subsurface water would continue to flow to the seep. The study results from various experts (e.g. groundwater engineer, entomologist, soils engineer) have combined to provide a comprehensive understanding of this damselfly habitat and allow for design measures to be incorporated into project plans to avoid affecting this species.



3. *During the construction and grading phase of the hillside, my residence, which is directly downhill from the proposed project, will be vulnerable to flooding and erosion in a heavy rain. I am extremely concerned that your best management practices will not be sufficient. How will you compensate us if all your best efforts fail?*

Response: Section 2.2.2 of the DEIS discusses the project's preliminary design and identifies several measures and best management practices (BMP) that would be implemented to minimize impacts from short-term construction activities. This includes measures implemented before construction commences, during construction activities, and measures during adverse weather conditions. Sediment basins would be used during construction to collect and detain runoff, allowing suspended soil to settle, and further minimize impacts from storm water runoff. Design measures and BMPs developed during the project's design phase would be reviewed by jurisdictional agencies for approval. It is unreasonable to expect some type of guarantee or compensation from the Petitioner that your home would not get flooded from a severe storm event or natural hazard, such as a hurricane. Severe weather conditions or natural hazards are beyond control. Nevertheless, the project's plans and BMPs would ensure sufficient measures are provided, as is typical with other development projects.

4. *I am retired and stay home during the day. All the noise, fugitive dust pollution and excavating vibrations associated with earthmoving construction will cause significant impacts on my quality of life.*

Response: Overall, construction activities would potentially be a short-term inconvenience and nuisance. However, several design measures and BMPs are proposed that would minimize and mitigate such effects. Therefore, these activities would not have a significant or adverse effect on your quality of life.

Regarding noise, as discussed in Section 4.5 of the DEIS, construction activities would inevitably generate noise volumes that would be audible at nearby residences. The actual sound levels experienced will vary during activities, and are a function of the distance from the noise source and sound attenuation (topography, vegetation structures). Typical noise levels would vary between 80 to 90 dBA from 50 feet away, and decreases with distance (-6 dBA when doubling distance). Your home is about 150 feet away from nearest construction activities. At this distance, construction noise would be lower. In addition, the majority of grading activities would occur well away from Ohaha Place, further minimizing noise disturbances. None of this noise would be high enough to cause hearing loss or interfere with oral communication at your residence. Further, the State Department of Health regulations would be followed, and a noise permit obtained would have further restrictions.

Fugitive dust emissions could result from earth moving activities as discussed in Section 4.6.2. To minimize such emissions, site grading would occur in phases of 5-acre increments. The geotechnical analysis notes existing soils would be moist to wet given the high rainfall environment surrounding the area. Therefore, these soils should result in less potential for airborne transmission of dust compared to drier soils. A dust control plan would be prepared if air quality impacts are anticipated by the project contractor. Measures to control fugitive dust emissions that may also be transported may involve BMPs consisting of a watering program, use of windscreens, and temporary rock pavers for heavily traversed areas. The majority of grading activities would occur well away from your residence and Ohaha Place further minimizing potential emission effects.

Grading activities should not result in significant vibrations that may affect your home. No explosives would be used, and most excavation occurs further inland (mauka) away from your

Ms. Bettye J. Harris

Page 3

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home reducing potential effects. Grading activities closer to your home would involve filling that would not cause vibration issues.

5. *I am against the Hawaiian Memorial Park Expansion for these considerable reasons.*

Response: We acknowledge your opposition to the project, and believe our responses adequately clarify and address your concerns.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

A handwritten signature in cursive script that reads "Scott Ezer". The signature is written in black ink and is positioned above the printed name.

Scott Ezer, Principal

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



10/21/2018

RE: HMP DEIS

I am very concerned about negative impacts from the proposed cemetery development to the Ohaha Place neighborhood. The main access road for the construction phase and then the long term access to the developed cemetery comes too close to Ohaha Place.

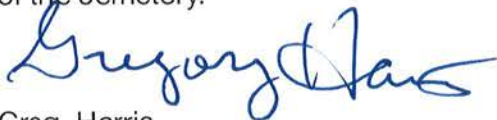
In Figure 2.3, if Road A were eliminated and Road B were re-aligned to join up with the existing Ocean View Gardens road, that could help solve some of the problems. I have included a modified Figure 2.2 where I have sketched a new road alignment and a shaded area buffer zone.

The benefits of these changes are:

1. Protecting the Damselfly habitat
2. Larger buffer zone away from homes during construction noise, dust, and exhaust
3. Less loss of forest and impact of views
4. Larger buffer zone away from homes in perpetuity

The flooding issues would need to still be addressed in this modified plan.

If this additional land were added to the proposed 130 acre Conservation easement, thus protecting it from future development, then I would be more inclined to support the expansion of the cemetery.



Greg Harris  
45-170 Ohaha Pl  
Kaneohe, HI. 96744





**Figure 2.2**

**Proposed Concept Plan**

Hawaiian Memorial Park Cemetery Expansion Project Draft Environmental Impact Statement  
 Kaneohe, O'ahu, Hawaii



March 29, 2019

Mr. Greg Harris  
45-170 Ohaha Place  
Kāneʻohe, HI 96744

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

Dear Mr. Harris:

Thank you for your October 21, 2018 letter providing comments on the Draft Environmental Impact Statement (DEIS) for the subject project. We have provided responses under numbered subheadings corresponding to your comments.

1. *I am very concerned about negative impacts from the proposed cemetery development to the Ohaha Place neighborhood. The main access road for the construction phase and then the long term access to the developed cemetery comes too close to Ohaha Place.*

Response: The proposed project would not have adverse impacts to the Ohaha Place neighborhood based upon the analysis within the DEIS. Drainage conditions would be improved reducing potential flooding; there are no significant social or fiscal issues; public facilities and infrastructure would not be significantly impacted; and various design and minimization measures have been proposed to address construction-related effects. Although the character of this privately-owned hillside property would be changed, it would not significantly impact important public viewsheds or viewing locations as discussed in Section 4.7.

The primary access road to the Petition Area used for construction activities has not been established as the design phase and construction plans have not been developed yet. However, utilizing the remnants of an old roadway through this area is possible and would be determined during the design phase. It is noted that no reasonable justification or analysis is provided why you believe the proposed project's proposed access roads are too close, and why already proposed buffer areas are insufficient. The closest segment of the access road would be over 250 feet away from the nearest residential property. The Ohaha Place roadway is even further away, and a large vegetated buffer (about 150 feet or more) would be provided for adjacent homes.

2. *In Figure 2.3, if Road A were eliminated and Road B were re-aligned to join up with the existing Ocean View Gardens road, that could help solve some of the problems. I have included a modified Figure 2.2 where I have sketched a new road alignment and a shaded area buffer zone.*

Response: Thank you for the suggestion shown on your attached map. However, eliminating that segment of the access road is not necessary for the reasons previously explained. Furthermore, expanding the buffer area would eliminate large areas of the cemetery expansion, which is not necessary, reasonable, or justified.



3. *The benefits of these changes are: 1) protecting the Damselfly habitat; 2) larger buffer zone away from homes during construction noise, dust, and exhaust; 3) less loss of forest and impact of views; and 4) larger buffer zone away from homes in perpetuity.*

- a. Response: As discussed in Section 2.2.2 and 3.5, the damselfly habitat would be protected by preserving the area around the seep, and would not be affected by development of the cemetery expansion.
- b. Response: Your proposed additional buffer area is not necessary and would significantly impact the burial plot areas. A large buffer zone of about 150 feet or more is being provided between the cemetery expansion and residences that is sufficient for properties along Ohaha Street and Ohaha Place. This buffer is also consistent with the City's Sustainable Communities Plan guidelines. It is noted that there is no buffer zone for residences next to the existing HMP cemetery, and open space between some residences adjacent to Ocean View Garden is less than 50 feet. Effects from construction noise and dust would be a short-term concern, and would not be a factor over the long-term associated with the expanded cemetery. The DEIS sections discuss several design measures and best management practices that would be implemented to minimize such temporary effects.
- c. Response: As discussed in Section 3.3, the existing Petition Area consists of an alien forest dominated by introduced plant species. The project would not adversely impact the botanical resources of this forest, and changing portions of the existing landscape to grass turf would have beneficial effects on drainage conditions, increase stormwater infiltration within the watershed, improve water quality, and reduce potential flooding. As discussed in Section 4.7.2, the character of this privately-owned hillside would change, but would still be compatible with the surrounding environment. The landscaped and open space character of the expanded cemetery would complement the existing HMP and Hawai'i State Veterans Cemetery already present within the backdrop of the larger Oneawa hillside. This change would not have an adverse effect on existing important public viewsheds and viewing locations. Such landscaped open space views and the character of the expanded cemetery are similar to other existing nearby uses, consisting of the Pali Golf Course and Ko'olau Golf Club. The Petition Area would continue to be obscured by mature trees associated with the vegetated buffer separating nearby residences.
- d. Response: A permanent larger buffer zone from residences is not necessary or warranted as discussed under response No. 3.b.

4. *The flooding issues would need to still be addressed in this modified plan.*

Response: As discussed in Section 2.2.2, the project's preliminary design would accommodate the 100-year storm event instead of the required 10-year storm event. In comparison, the City-designed system of swales along the subdivision collecting stormwater was designed for the 10-year, 1-hour storm. Your proposed changes to the plan will not be implemented for reasons already discussed, therefore, flooding issues associated with that scenario do not need to be addressed in the FEIS.

The project does propose detention basins that serve as a low impact development strategy as runoff retention would allow stormwater infiltration and additional time for pollutants to settle before runoff drains off site. Detention basins would reduce the discharge volumes by an additional 3 percent for the 100-year storm event. The DEIS analysis indicates that the velocity and volume of runoff from the Petition Area would decrease with project implementation due to the reduction in

site slopes from grading improvements reducing the velocity stormwater travels downslope, allowing additional time for stormwater infiltration. The grassed cemetery expansion would further decrease runoff velocity, increase stormwater infiltration, and reduce erosion and sedimentation presently being discharged. Therefore, proposed project improvements would have a beneficial effect on the environment, drainage conditions, and subsequently potential downstream flooding.

5. *If this additional land were added to the proposed 130 acre Conservation easement, thus protecting it from future development, then I would be more inclined to support the expansion*  
Response: Unfortunately, your proposed additional buffer area and elimination of a segment of the access road is not warranted. As discussed in Section 2.2, the planned conservation easement would prevent future development of the larger property from that proposed, and the current proposed buffer area is reasonable and practicable. We acknowledge your continued opposition to this project.

Thank you for providing us with your comments on the DEIS and participating in this process. If you have any questions, please contact me at 457-3158 or sezer@hhf.com.

Sincerely,

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

Scott Ezer, Principal

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



