

HUI O PIKOILOA, an unincorporated association,
LIANNE CHING, BETTYE HARRIS, RICHARD MCCREEDY,
JULIANNE MCCREEDY, JESSE REAVIS, and
GRANT YOSHIMORI
c/o 45-464 Lipalu Street
Kaneohe, HI 96744
Telephone No.: (808) 236-0502

LAND USE COMMISSION
STATE OF HAWAII

2020 JUN -8 A 10: 33

INTERVENORS PRO SE

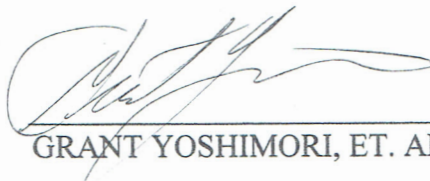
BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAII

IN THE MATTER OF:) DOCKET NO. A17-804
)
HAWAIIAN MEMORIAL LIFE PLAN, LTD.,)
a Hawaii Corporation) INTEVENOR'S AMENDED LIST OF
) EXHIBITS; EXHIBIT 15; CERTIFICATE
To Amend The Conservation Land Use District) OF SERVICE
Boundary Into The Urban Land Use District)
For Approximately 53.449 Acres Of Land At)
Kāne'ohe, Island of Oahu, State of Hawai'i,)
Tax Map Key: (1) 4-5-003:por.001)
)
)
_____)

AMENDED LIST OF EXHIBIT

EXHIBIT 15

DATED: Honolulu, Hawaii, June 8, 2020.



GRANT YOSHIMORI, ET. AL.

Intervenors

DOCKET NO./PETITIONER: A17-804/HAWAIIAN MEMORIAL LIFE PLAN, LTD.PARTY: GRANT YOSHIMORI ET. AL.**AMENDED LIST OF EXHIBITS**

EXHIBIT NUMBER	DESCRIPTION	PARTY: OBJECTIONS	ADMIT
1	Online Petition and Electronic Signatures and Comments		
2	Signed Petition of Individuals Opposing Project		
3	Resume of Dana Alden, Ph.D.		
4	Resume of Winston Welch		
5	Resume of Nathan Yuen		
6	Resume of Steven Businger, Ph.D.		
7	Letter from Councilmember Kymberly Pine to Daniel Orodenker and Kathy Sokugawa dated September 24, 2019		
8	Letter from Administrator David Smith to Ronald Sato dated October 31, 2018		
9	Resume of M. Lee Goff, Ph.D.		
10	Excerpts from Federal Register Volume 77, No. 181		

DOCKET NO./PETITIONER: A17-804/HAWAIIAN MEMORIAL LIFE PLAN, LTD.

PARTY: GRANT YOSHIMORI ET. AL.

AMENDED LIST OF EXHIBITS

EXHIBIT NUMBER	DESCRIPTION	PARTY: OBJECTIONS	ADMIT
11	Resume of John Higham		
12	Hawaii Business Article: The Cost of Dying https://www.hawaiibusiness.com/the-cost-of-dying/		
13	CBS News Article: A buried problem at country's top funeral home chain?		
14	Resume of Ken Middleton		
15	Intervenor Analysis of CBRE Market Study (6/8/2020)		
16			
17			
18			
19			
20			

CBRE Market Study* Review

Intervenors concluded the following:

- 1) Casket burials projection overstated by 30,549 plots
- 2) Ash burials projection overstated by 12,660 plots
- 3) Burial supply understated by 4,500 plots
- 4) Burial demand overstated by assuming one urn/casket per plot

By adjusting for the above, the projection of Oahu burial plots needed through 2040 is **REDUCED** with :

- Scenario 1 (minimum demand) has a **SURPLUS** of 59,093 of plots.
- Scenario 2 (maximum demand) has a **SURPLUS** of 36,181 of plots.

* CBRE Market Study (EIS Appendix B)

1) Casket burials projection overstated by 30,549 plots

Table from CBRE Study Page 34

This table summarizes CBRE’s Estimated Oahu Burial Needs thru 2040.

There is an error in the projected number of buried caskets needed.
The amount is overstated. Corrected value in red.

CBRE’s Need is overstated by 30,549 Plots

PROJECTION OF NET DEMAND FOR NON-VETERAN CEMETERY INTERMENTS ON OAHU 2018 THROUGH 2040						
TOTAL BURIALS DEMAND	2018-2020	2021-2025	2026-2030	2031-2035	2036-2040	Totals
Scenario One: Miminum Demand (Table 2)						
Projected Number of Interred Cremations	13,694	25,434	29,110	33,260	37,778	139,275
Projected Number of Burials	9,490	16,160	16,500	16,675	16,578	75,402
Total Interments	23,184	41,594	45,609	49,935	54,355	214,678
Less Burial Spaces Purchased and Previously Unused (1)	(6,600)	(11,000)	(11,000)	(11,000)	(10,400)	(50,000)
Less Veterans Interred at Veterans Cemeteries	(382)	(673)	(723)	(775)	(829)	(3,383)
Less Oahu Residents Interred on Other Islands (2)	(1,500)	(2,500)	(3,750)	(3,750)	(5,000)	(16,500)
Plus Allowances for Off-Shore Persons Being Buried on Oahu (Ten Per Year)	30	50	50	50	50	230
Total Periodic Net Demand for Additional Burial Spaces On Oahu	14,732	27,471	30,186	34,460	38,176	145,025
						114,475

44,853 Buried Urns
Buried Caskets
Total Burials
Less pre-bought, Veterans, off-isle
ESTIMATED PLOTS NEED THRU 2040

1) Casket burials projection overstated by 30,549 plots

PROJECTION OF NET DEMAND FOR NON-VETERAN CEMETERY INTERMENTS ON OAHU 2018 THROUGH 2040

TOTAL BURIALS DEMAND

	2018-2020	2021-2025	2026-2030	2031-2035	2036-2040	Totals
Scenario One: Minimum Demand (Table 2)						
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Total Periodic Net Demand for Additional Burial Spaces On Oahu	14,732	27,471	30,186	34,460	38,176	145,025

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ESTIMATE OF TOTAL OAHU CREMATIONS INTERRED 2018 THROUGH 2040

CREMATION BURIALS

Scenario One: Minimum Demand

Year	Total Deaths	Total Annual Cremations (1)	Ashes Are Scattered (2)	Other Forms of Disposal (3)	Total Interred Cremations
2018	8,085	5,821	(1,048)	(323)	4,450
2019	8,212	5,966	(1,074)	(328)	4,564
2020	8,342	6,115	(1,101)	(334)	4,680
2021	8,492	6,281	(1,131)	(340)	4,811
2022	8,646	6,452	(1,161)	(346)	4,945
2023	8,802	6,628	(1,193)	(352)	5,083
2024	8,961	6,808	(1,225)	(358)	5,224
2025	9,126	6,996	(1,259)	(365)	5,372
2026	9,282	7,179	(1,292)	(371)	5,516
2027	9,440	7,367	(1,326)	(378)	5,664
2028	9,601	7,561	(1,361)	(384)	5,816
2029	9,765	7,759	(1,397)	(391)	5,972
2030	9,950	7,977	(1,436)	(398)	6,143
2031	10,119	8,186	(1,473)	(405)	6,308
2032	10,292	8,400	(1,512)	(412)	6,477
2033	10,467	8,621	(1,552)	(419)	6,650
2034	10,646	8,846	(1,592)	(426)	6,828
2035	10,806	9,060	(1,631)	(432)	6,997
2036	10,979	9,289	(1,672)	(439)	7,177
2037	11,155	9,522	(1,714)	(446)	7,362
2038	11,334	9,762	(1,757)	(453)	7,552
2039	11,516	10,008	(1,801)	(461)	7,746
2040	11,694	10,254	(1,846)	(468)	7,940
Totals	225,711	180,858	(32,555)	(9,028)	139,275

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This table used to calculate cremation burials

2st Column: Total Deaths

3rd Column: Cremations as a % of Deaths
(72% with .9% annual increase)

4th Column: Less Ashes scattered

5th Column: Less other ash methods

Results in Total Interred Cremations (i.e. the remaining ashes needing to be buried)

That is carried to top: TOTAL NUMBER OF CREMATION TO BURY

1) Casket burials projection overstated by 30,549 plots

PROJECTION OF NET DEMAND FOR NON-VETERAN CEMETERY INTERMENTS ON OAHU 2018 THROUGH 2040

TOTAL BURIALS NEEDED

	2018-2020	2021-2025	2026-2030	2031-2035	2036-2040	Totals
Scenario One: Minimum Demand (Table 2)						
Projected Number of Interred Cremations	13,694	25,434	29,110	33,260	37,778	139,275
Projected Number of Burials	9,490	16,160	16,500	16,675	16,578	75,402
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Plus Allowances for Off-Shore Persons Being Buried on Oahu (Ten Per Year)	30	50	50	50	50	230
Total Periodic Net Demand for Additional Burial Spaces On Oahu	14,732	27,471	30,186	34,460	38,176	145,025

CBRE calculated casket burials using assumptions inconsistent with those used in the cremation burial calculations.

ESTIMATE OF TOTAL OAHU CREMATIONS INTERRED 2018 THROUGH 2040

CREMATION BURIALS

Scenario One: Minimum Demand

Year	Total Deaths	Total Annual Cremations (1)	Ashes Are Scattered (2)	Other Forms of Disposal (3)	Total Interred Cremations
2018	8,085	5,821	(1,048)	(323)	4,450
2019	8,212	5,966	(1,074)	(328)	4,564
2020	8,342	6,115	(1,101)	(334)	4,680
2021	8,492	6,281	(1,131)	(340)	4,811
2022	8,646	6,452	(1,161)	(346)	4,945
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2032	10,292	8,400	(1,512)	(412)	6,477
2033	10,467	8,621	(1,552)	(419)	6,650
2034	10,646	8,846	(1,592)	(426)	6,828
2035	10,806	9,060	(1,631)	(432)	6,997
2036	10,979	9,289	(1,672)	(439)	7,177
2037	11,155	9,522	(1,714)	(446)	7,362
2038	11,334	9,762	(1,757)	(453)	7,552
2039	11,516	10,008	(1,801)	(461)	7,746
2040	11,694	10,254	(1,846)	(468)	7,940
Totals	225,711	180,858	(32,555)	(9,028)	139,275

ESTIMATE OF TOTAL BURIALS ON OAHU 2018 THROUGH 2040

CASKET BURIALS

Scenario One: Minimum Demand

Year	Total Deaths	Number of Burials (1)	Total Deaths	Number of Burials (2)
2018	8,085	3,150	8,147	2,672
2019	8,212	3,164	8,340	2,726
2020	8,342	3,177	8,537	2,781
2021	8,492	3,196	8,738	2,837
2022	8,646	3,215	8,944	2,894
2023	8,802	3,233	9,156	2,951
2024	8,961	3,250	9,372	3,010
2025	9,126	3,267	9,593	3,070
2026	9,282	3,279	9,819	3,131
2027	9,440	3,290	10,051	3,193
2028	9,601	3,300	10,288	3,256
2029	9,765	3,309	10,531	3,320
2030	9,950	3,322	10,780	3,385
2031	10,119	3,329	11,034	3,452
2032	10,292	3,334	11,295	3,519
2033	10,467	3,338	11,561	3,588
2034	10,646	3,340	11,834	3,658
2035	10,806	3,334	12,114	3,729
2036	10,979	3,330	12,400	3,801
2037	11,155	3,325	12,692	3,874
2038	11,334	3,318	12,992	3,949
2039	11,516	3,309	13,299	4,025
2040	11,694	3,296	13,612	4,102
Totals	225,711	75,402	245,130	76,924

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PROOF OF ERROR: Adding total burials to total cremations EXCEEDS DEATHS (i.e. more buried than died!)

Total Burial 75,402
 Total Cremation 180,858
 Total Deaths 256,260

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1) Casket burials projection overstated by 30,549 plots

Using assumptions consistent with the Cremation Burial table, We can calculate number of caskets needed as Deaths – Total Cremations = Casket Burials

PROJECTION OF NET DEMAND FOR NON-VETERAN CEMETERY INTERMENTS ON OAHU 2018 THROUGH 2040

TOTAL BURIALS NEEDED

	2018-2020	2021-2025	2026-2030	2031-2035	2036-2040	Totals
Scenario One: Minimum Demand (Table 2)						
Projected Number of Interred Cremations	13,694	25,434	29,110	33,260	37,778	139,275
Projected Number of Burials	9,490	16,160	16,500	16,675	16,578	75,402
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Less Veterans Interred at Veterans Cemeteries	(382)	(673)	(723)	(775)	(829)	(3,383)
Less Oahu Residents Interred on Other Islands (2)	(1,500)	(2,500)	(3,750)	(3,750)	(5,000)	(16,500)
Plus Allowances for Off-Shore Persons Being Buried on Oahu (Ten Per Year)	30	50	50	50	50	230
Total Periodic Net Demand for Additional Burial Spaces On Oahu	14,732	27,471	30,186	34,460	38,176	145,025

44,853

CASKET BURIALS OVERSTATED BY 30,549

114,475 <- Total Oahu Demand

ESTIMATE OF TOTAL OAHU CREMATIONS INTERRED 2018 THROUGH 2040

CREMATION BURIALS

Scenario One: Minimum Demand

Year	Total Deaths	Total Annual Cremations (1)	Ashes Are Scattered (2)	Other Forms of Disposal (3)	Total Interred Cremations
2018	8,085	5,821	(1,048)	(323)	4,450
2019	8,212	5,966	(1,074)	(328)	4,564
2020	8,342	6,115	(1,101)	(334)	4,680
2021	8,492	6,281	(1,131)	(340)	4,811
2022	8,646	6,452	(1,161)	(346)	4,945
2023	8,802	6,628	(1,193)	(352)	5,083
2024	8,961	6,808	(1,225)	(358)	5,224
2025	9,126	6,996	(1,259)	(365)	5,372
2026	9,282	7,179	(1,292)	(371)	5,516
2027	9,440	7,367	(1,326)	(378)	5,664
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2029	9,765	7,759	(1,397)	(391)	5,972
2030	9,950	7,977	(1,436)	(398)	6,143
2031	10,119	8,186	(1,473)	(405)	6,308
2032	10,292	8,400	(1,512)	(412)	6,477
2033	10,467	8,621	(1,552)	(419)	6,650
2034	10,646	8,846	(1,592)	(426)	6,828
2035	10,806	9,060	(1,631)	(432)	6,997
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2037	11,155	9,522	(1,714)	(446)	7,362
2038	11,334	9,762	(1,757)	(453)	7,552
2039	11,516	10,008	(1,801)	(461)	7,746
2040	11,694	10,254	(1,846)	(468)	7,940
Totals	225,711	180,858	(32,555)	(9,028)	139,275

Casket Burials

44,853

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2) Ash burials projection overstated by 12,660 plots

ESTIMATE OF TOTAL OAHU CREMATIONS INTERRED 2018 THROUGH 2040					
CREMATION BURIALS Scenario One: Minimum Demand					
Year	Total Deaths	Total Annual Cremations (1)	Ashes Are Scattered (2)	Other Forms of Disposal (3)	Total Interred Cremations
2018	8,085	5,821	(1,048)	(323)	4,450
2019	8,212	5,966	(1,074)	(328)	4,564
2020	8,342	6,115	(1,101)	(334)	4,680
2021	8,492	6,281	(1,131)	(340)	4,811
2022	8,646	6,452	(1,161)	(346)	4,945
2023	8,802	6,628	(1,193)	(352)	5,083
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2027	9,440	7,367	(1,326)	(378)	5,664
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2030	9,950	7,977	(1,436)	(398)	6,143
2031	10,119	8,186	(1,473)	(405)	6,308
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2033	10,467	8,621	(1,552)	(419)	6,650
2034	10,646	8,846	(1,592)	(426)	6,828
2035	10,806	9,060	(1,631)	(432)	6,997
2036	10,979	9,289	(1,672)	(439)	7,177
2037	11,155	9,522	(1,714)	(446)	7,362
2038	11,334	9,762	(1,757)	(453)	7,552
2039	11,516	10,008	(1,801)	(461)	7,746
2040	11,694	10,254	(1,846)	(468)	7,940
Totals	225,711	180,858	(32,555)	(9,028)	139,275

(45,215) : Increase by 12,660

(1) Projected to follow trends of last five years of 0.9% growth in percent total deaths ending in cremations on going-forward basis. Currently at 72 percent of total deaths.

(2) Estimated 39% of decedents cremated nationally request this but only about 35% estimated actualized. Hawaii, owing to its Asian cultural components, has higher percentage of cremations and interrs a much higher percentage. We estimate 18% of Hawaii cremations have ashes scattered, one-half national average.

(3) Includes urns kept at home or other location. Estimated 10% of decedents nationally request this, with estimated 8% actualized. Again we estimate Hawaii at on-half the national average.

Compiled by CBRE/Hallstrom Team

Cremation Burial table calculated scattered Cremations as 18% of cremations

However, intro paragraph says :

“Scenario One, resulting in minimum burial space demand, *estimated that 25 percent of Oahu cremations* result in a scattering of ashes and four percent are otherwise disposed.” And, nationally 35 percent scatter ashes.

Correcting scatter rate from 18% To 25% (per Page 29) increases scattering, thus reducing Cremation Burials by 12,660.

3) Burial supply understated by 4,500 plots

MAXIMUM ESTIMATED TOTAL EXISTING AND PROPOSED SUPPLY OF MAJOR OAHU INTERMENT OPTIONS BY 2040			
BURIAL SUPPLY	Combined Burial Plots, Crypts and Niche Spaces		
	Existing Available	Currently Proposed	Total Available and Proposed
Diamond Head Memorial Park	1,300	0	1,300
Nuuanau Memorial Park	700	0	700
Oahu Cemetery	700	0	700
Valley of the Temples Memorial Park	9,700	46,000	55,700
Mililani Memorial Park	3,800	19,000	22,800
Laie Cemeteries	300	0	300
Hawaii Kai Cemetery (Proposed) (1)	0	24,000	24,000
TOTALS	16,500	89,000	105,500

This table calculates Supply, but per the EIS, Section 2.1.2.1, as of April 2018, “about 4,500 plots) remain available for the public” at HMP

Adding HMP’s 4/2018 Unsold plots adds 4,500 to supply.

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110,000

SUMMARY OF EFFECTS – Scenario #1 (Minimum Demand)

PROJECTION OF POTENTIAL SUBJECT PLOT ABSORPTION USING THE RESIDUAL METHOD BASED ON ESTIMATED EXISTING AND PROJECTED SHORTAGE PROPOSED PLOTS IN MAJOR OAHU CEMETERIES 2018 THROUGH 2040

Segment	2018-2020	2021-2025	2026-2030	2031-2035	2036-2040	TOTALS
<i>1. Minimum Demand</i>						
Assumed Supply of Burial Plots, Crypts and Cremation Niches Major Cemeteries	13,761	22,935	22,935	22,935	22,935	105,500
Oahu Net Burial Spaces Demand	14,732	27,471	30,186	34,460	38,176	145,025
Shortage or (Excess) Supply	971	4,536	7,252	11,525	15,241	39,525
Potential Residual Subject Minimum Demand						
at 100% Capture Rate	971	4,536	7,252	11,525	15,241	39,525
at 95% Capture Rate	923	4,309	6,889	10,749	14,479	37,549

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Scenario #1	Original	Discrepancy	Adjusted
Assumed Supply	105,550		110,000
3) HMP's Unsold Plots		+4,500	
Oahu Net Burial Demand	145,025		101,819
1) Casket Burial overstated		-30,549	
2) Ash Burials Overstated		-12,660	
Shortage or (Excess) Supply in 2040	39,525		(8,184)

4) Burial demand overstated by assuming one urn/casket per plot

If we assume 2 urns/caskets per plot, would further reduce demand by HALF!

Excess Supply would be (59,093).

SUMMARY OF EFFECTS Scenario #2 (Maximum Demand)

Scenario #1 was the “minimum perspective”

Scenario #2 assumed greater population growth, higher death rate, lower cremation growth rate (.45% vs .9%), and a lower ash scattering rate (12% vs. 18%) than Scenario #1

PROJECTED SHORTAGE

2. Maximum Demand

Assumed Supply of Burial Plots, Crypts and Cremation Niches Major Cemeteries	13,761	22,935	22,935	22,935	22,935	105,500
Oahu Net Burial Spaces Demand	15,128	29,338	33,841	40,367	47,120	165,795
Shortage or (Excess) Supply	1,367	6,403	10,907	17,432	24,186	60,295
Potential Residual Subject Minimum Demand						
at 100% Capture Rate	1,367	6,403	10,907	17,432	24,186	60,295
at 95% Capture Rate	1,298	6,083	10,361	16,561	22,976	57,280

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Scenario #2	Original	Discrepancy	Adjusted
Assumed Supply	105,550		110,000
3) HMP's Unsold Plots		+4,500	
Oahu Net Burial Demand	165,795		147,638
1) Casket Burial overstated		-18,157	
Shortage or (Excess) Supply in 2040	60,295		37,638

4) Burial demand overstated by assuming one urn/casket per plot

If we assume 2 urns/caskets per plot, would further reduce demand by HALF!

Excess Supply would be (36,181).

CBRE Market Study* Review

Petitioner states that the District Boundary Amendment is required because Oahu cemetery supply will not meet demand through year 2040, saying:

“With a future projected demand of between 145,030 and 165,800 burial spaces needed, the likely inventory of between 85,100 to 109,100 spaces would be significantly short of adequately meeting this demand.” - EIS Page 2-14

However, correcting for discrepancies in study, in both Scenario 1 or Scenario 2, **current supply can accommodate Oahu’s needs thru 2040 and beyond**

	Projected Cemetery Plot Shortage (Excess)	Adjusted Cemetery Plot Shortage (Excess)
Scenario #1	39,525	(59,093)
Scenario #2	60,295	(36,181)

HUI O PIKOILOA, an unincorporated association,
LIANNE CHING, BETTYE HARRIS, RICHARD MCCREEDY,
JULIANNE MCCREEDY, JESSE REAVIS, and
GRANT YOSHIMORI
c/o 45-464 Lipalu Street
Kaneohe, HI 96744
Telephone No.: (808) 236-0502

INTERVENORS PRO SE

BEFORE THE LAND USE COMMISSION
OF THE STATE OF HAWAII

IN THE MATTER OF:) DOCKET NO. A17-804
)
HAWAIIAN MEMORIAL LIFE PLAN, LTD.,)
a Hawaii Corporation) CERTIFICATE OF SERVICE
)
To Amend The Conservation Land Use District)
Boundary Into The Urban Land Use District)
For Approximately 53.449 Acres Of Land At)
Kāneʻohe, Island of Oahu, State of Hawaiʻi,)
Tax Map Key: (1) 4-5-003:por.001)
)
)
_____)

CERTIFICATE OF SERVICE

I hereby certify that due service of a copy of the within document was made by
depositing the same with the U. S. mail, postage prepaid, or by hand delivery, on June 8, 2020,
addressed to:

MARY ALICE EVANS
Director
Office of Planning, State of Hawaii
235 S. Beretania St. 6th Floor
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BY HAND DELIVERY

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BY HAND DELIVERY

DATED: Honolulu, Hawaii, June 8, 2020.



GRANT YOSHIMORI, ET. AL.

Intervenors