John L Higham
44-048 Kaimalu Place
Kaneohe, Hawaii 96744

April 28, 2025

Ms. Jamisen Hirota, P.E.
Principal, Civil Engineering
Coffman Engineers, Inc.
745 Fort Street, Suite 400
Honolulu, Hawaii 96813

Subject: Hawaiian Memorial Park Expansion

Ms. Hirota

I received your letter, dated April 7, 2025, and appreciate the detail of your response to my comments. In your letter you twice stated that the ***"residents below the project site are getting a proposed improvement in the Hawaiian Memorial Park Expansion that will at worst, have no impact from their current condition or most likely, will better their condition from the condition if the project were not constructed."*** In reality, the residents below the project site are getting a project that they do not want and would be happier if it did not happen.

To me, it is only a matter of time. A matter of time before there will be a storm that overwhelms your carefully laid out grading plan and designed drainage improvements. The Hawaii Kai New Year's Eve Flood in 1987, the Manoa Flood in Oct 2004 , the Kapolei Flood in December 2010 and the Aina Hina Flood in April 2018 all overwhelmed carefully designed drainage systems that were probably all designed for 100 yr 24 hour storms (or Plate 6 in the City Design Standards due to their very large tributary areas). In Hawaii Kai an entire road was washed away & many homes flooded, causing an estimated $34 million in damages (see attached article). In Manoa, Hamilton Library on the UH Manoa campus was flooded along with 30 other structures resulting is an estimated $80 million in damages (see attached article). In Aina Hina there was flooding along Kalanianiole Highway and in homes adjacent to mauka–makai drainage channels, mauka of Kalanianiole Highway. In Kapolei, Farrington Highway was overtopped and Kalaeloa Boulevard leading to the Campbell Industrial Park was closed for a period of time due to 2 ft of water flowing across it.

It is only a matter of time before there will be a storm that overwhelms your carefully designed drainage system. Afterwards, there will likely be investigations as to whether the runoff from the Hawaii Memorial Park property was less than, the same as, or worse than from the undeveloped condition. The outcome of the inevitable law suits and investigations, that might take years to resolve, will be little comfort to the residents below the project site whose homes may have been flooded regardless of the reason.

I am hoping to provide the residents "below the project site" with as much protection from flooding as reasonably possible. The Hawaiian Memorial Park Expansion project (HMEP) requires a discretionary approval from the State Land Use Commission and I had hoped that HMP would be willing to provide a little more than just the absolute minimum that they were required to do in return for receiving the discretionary permit. Comment #6 in my letter to you asked if the water quality basins/Sediment Traps installed prior to construction could be left in place after the construction is finished (even though that is not normally done) to provide a little more protection for the residents "below the project site", especially in the area where there are previously constructed rather small drainage inlets/swales in the backyards. Although I did not identify them specifically, Sediment Traps 2, 3 and 4 (see attached Sheet C-100) are the ones that I think would provide a little more protection in those areas.

Sediment Trap 2 (with a capacity of 5,106 Cubic Feet, see attached Sheet C-100) appears to be outside the limits of grading, but within an area referred to as "additional limits of disturbance", presumably the "disturbance" required to construct Sediment Trap 2. This sediment trap sits in a natural gully directly upstream from the last existing home on the west side of Lipalu Street which has no backyard drainage inlet but an unlined earth "cutoff" ditch running from the backyard to the street along the mauka property line. Since Sediment Trap 2 is outside the limits of grading it can't be "in the way" of the proposed development. Why can't it be left in place as some additional measure of protection? Wouldn't the developer save money by not having to remove it?

Sediment Trap 3 (with a capacity of 12,966 Cubic Feet, see attached Sheet C-100) appears to be immediately adjacent to the much smaller proposed permanent "Makai Wall Outfall 2 Stilling Basin" (see Sheet CP-100 and Detail #1 on Sheet C-504) both of which are directly upstream of the small backyard drainage inlet behind the home (TMK: 4-5-092:013) at the end of Ohaha Place. It would be much safer for the owner of that home if Sediment Trap 3 was left in place but it would require some changes to the proposed grading in that area. Is that too great a price to pay for a little more safety for that homeowner and the community?

Sediment Trap 4 (with a capacity of 10,012 Cubic Feet, see attached Sheet C-100) appears to be immediately adjacent to the much smaller proposed permanent "Makai Wall Headwall and Outfall 1 Riprap" (see Sheet CP-100 and Detail #6 on Sheet C-505) both of which are directly

upstream of the small backyard drainage inlet behind the home (TMK 4-5-092:017) on Ohaha Street that is one lot west of Ohaha Place and also appears to drain across the backyard of the home (TMK 4-5-092:015) on the west side of the cul-de-sac at the end of Ohaha Place. It would be much safer for the owners of those two homes if Sediment Trap 4 was left in place but it would also require some changes to the proposed grading in that area. Is that too great a price to pay for a little more safety for those two homeowners and the community?

Each of these Sediment Traps are directly up stream from relatively small existing drainage inlets/ditches in the backyards of existing homes. The four relatively small existing "backyard" drainage inlets/ditches show up best on Sheet CG-100 (see attached).

Immediately adjacent to and upstream of Sediment Trap 4, the plans call for the installation of a new 30" diameter drainline discharging into a very small basin (see Detail #6 on the attached Sheet C-505) that will overflow in storms and flow directly down to the backyard drainage inlet in the backyard of TMK 4-5-092:017 that appears on the as-builts for the subdivision, to only have an 18" diameter pipe to convey the runoff from the 30" diameter pipe, between the two adjacent houses, to the street. That seems like a potentially serious problem just waiting for a flash flood to occur, especially without Sediment Trap #4 remaining on a permanent basis.

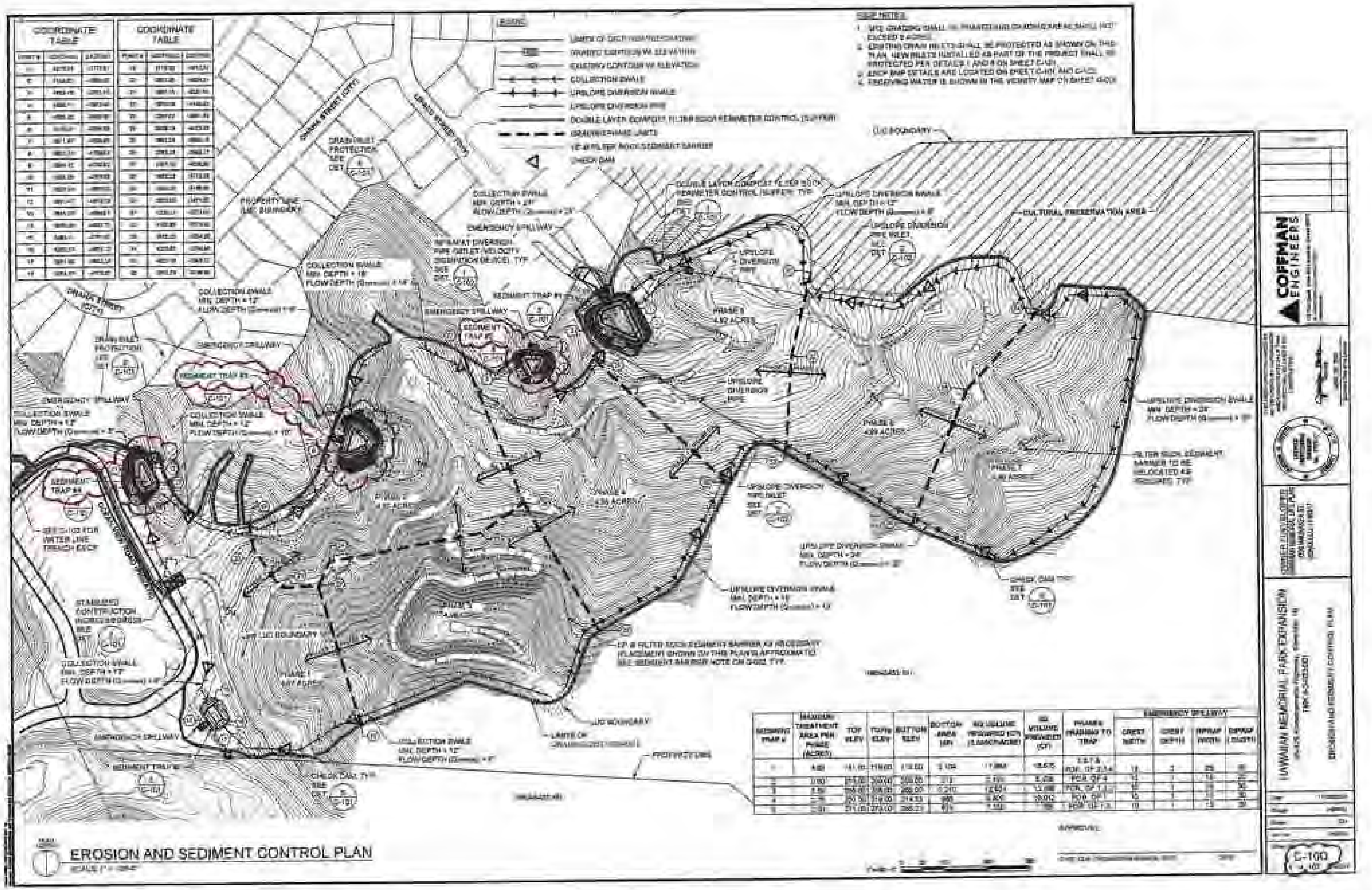
It is only a matter of time . . . . . .

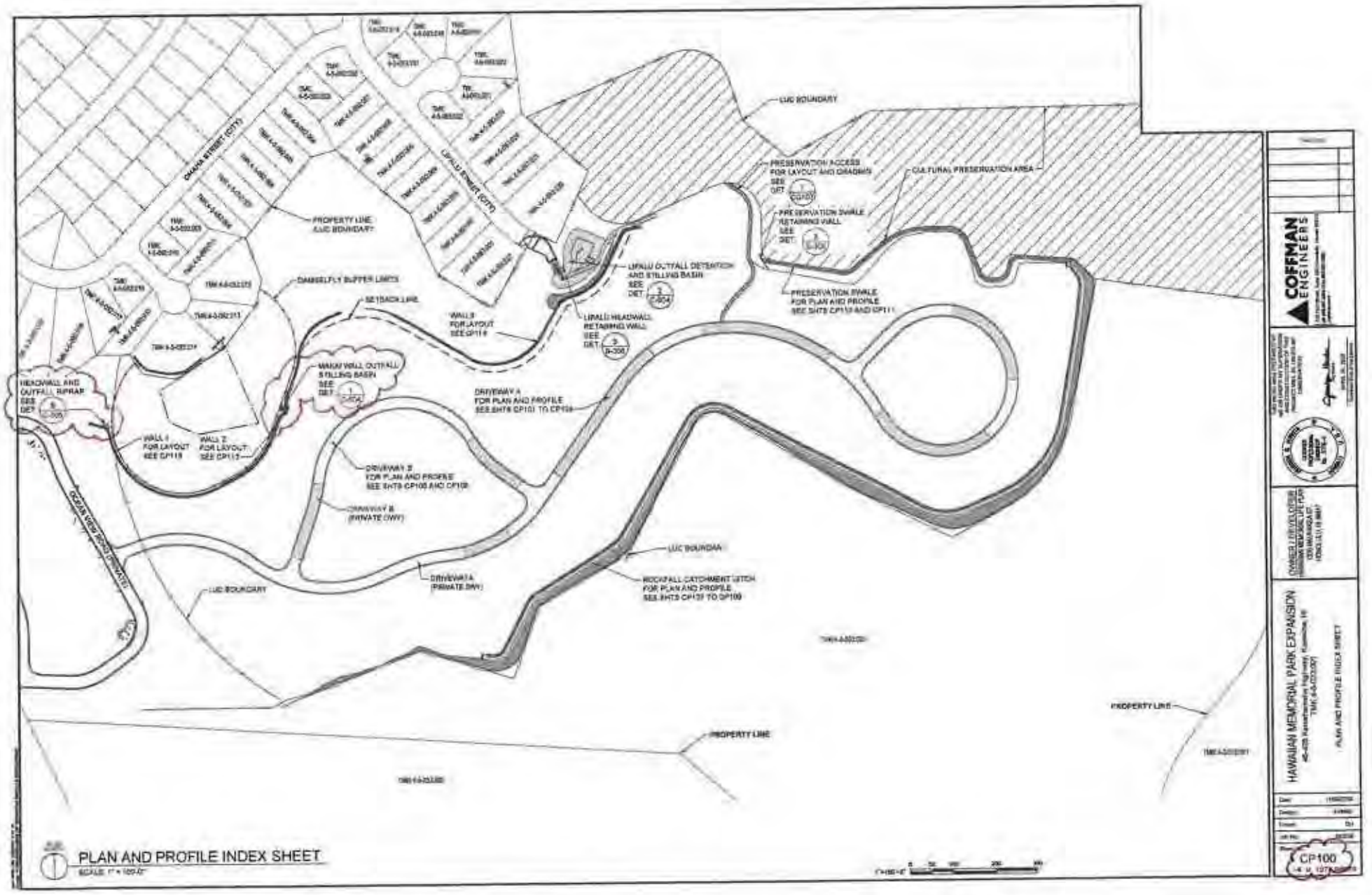
Sincerely

John L Higham

John Higham

Cc Daniel E. Orodenker, LUC
Franz Kraintz, DPP
Grant Yoshimori
Richard McCreedy


EROSION AND SEDIMENT CONTROL PLAN
SCALE: 1" = 100'
COFFMAN ENGINEERS
HAWAIIAN MEMORIAL PARK EXPANSION
EROSION AND SEDIMENT CONTROL PLAN
C-100
CULTURAL PRESERVATION AREA
LUC BOUNDARY
PROPERTY LINE
EMERGENCY SPILLWAY
EMERGENCY SPILLWAY



PLAN AND PROFILE INDEX SHEET

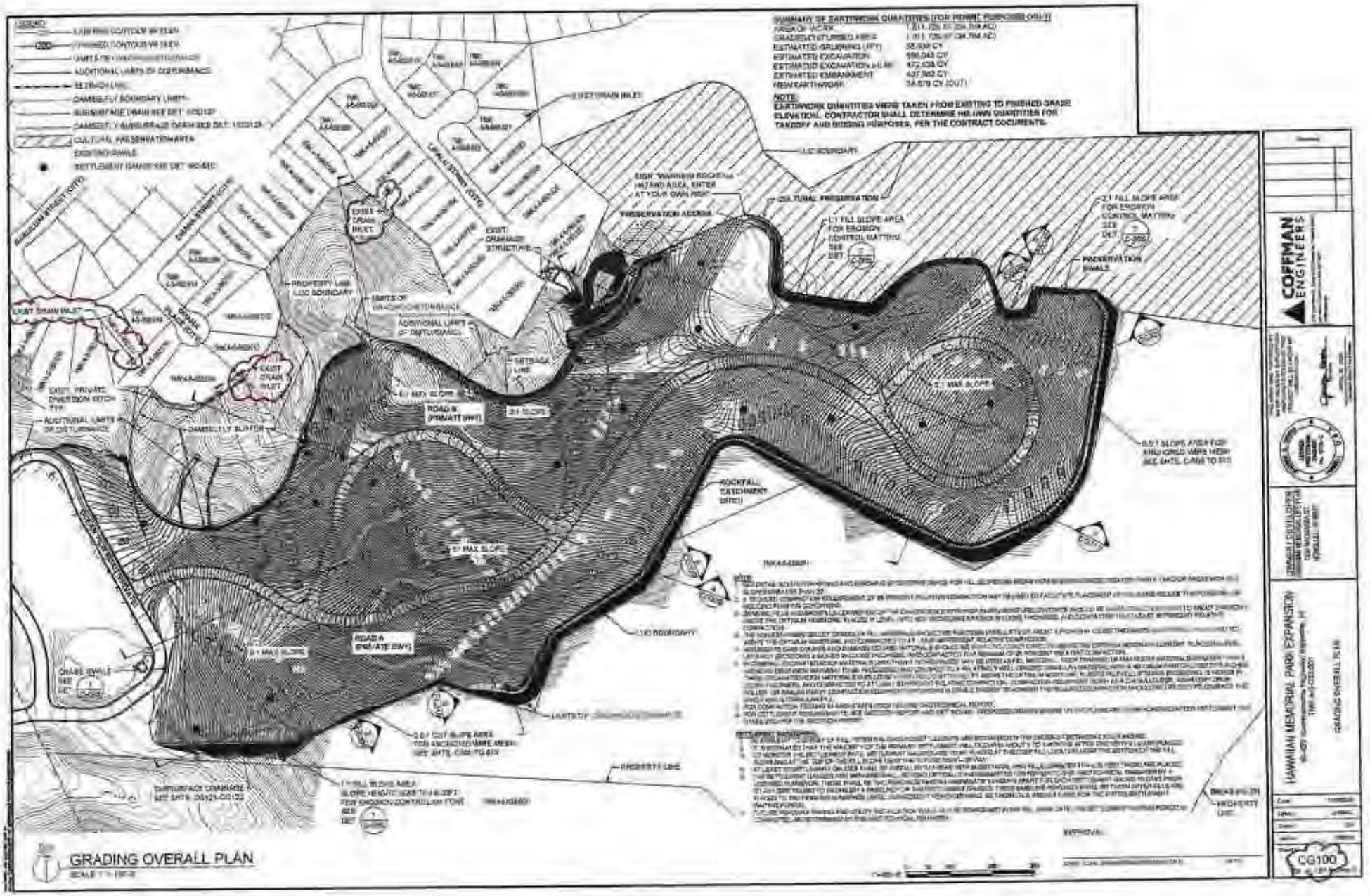
SCALE: 1" = 100'-0"

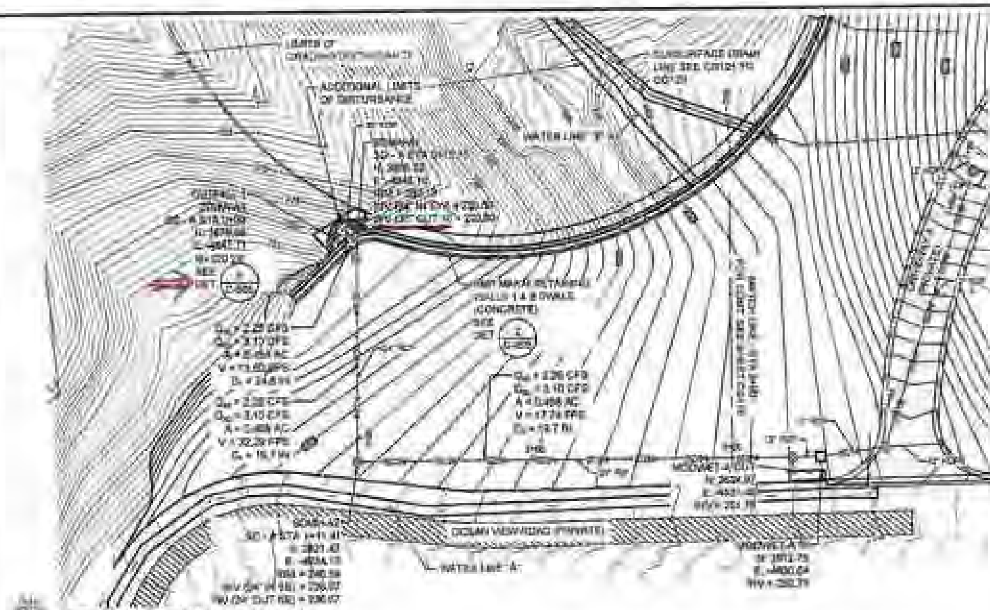
COFFMAN ENGINEERS

HAWAIIAN MEMORIAL PARK EXPANSION

PLAN AND PROFILE INDEX SHEET

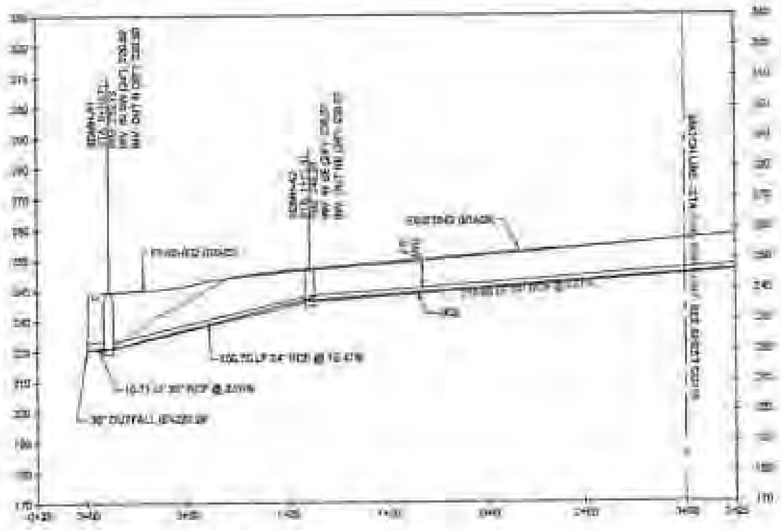
CP100


GRADING OVERALL PLAN
HAWAIIAN MEMORIAL PARK EXPANSION
COFFMAN ENGINEERS
CG100



STORM DRAIN A PLAN 1

SCALE: 1" = 30'-0"



STORM DRAIN A PROFILE 1

LEGEND

- EXISTING CONTOUR W/ ELEV.
- FINISHED CONTOUR W/ ELEV.
- SETBACK LINE
- LIMITS OF GRADING/DISTURBANCE
- ADDITIONAL LIMITS OF DISTURBANCE
- FENCE
- STORM DRAIN SIZE IN INCHES
- SUBSURFACE DRAIN
- STORM DRAIN MANHOLE
- PROPOSED WATER LINE
- EX WATER LINE (TO BE REMOVED)
- MODULAR WETLAND (VEGETATED BIOFILTER)
- DIVERSION STRUCTURE
- TYPE 2 CATCH BASIN
- ROLL CURB INLET

NOTE:

1. ROLL CURB INLET SHALL BE ADS NYLOPLAST ... ROLL CURB INLET OR APPROVED EQUAL. SEE DET. 4, SHT. C-611.
2. DIVERSION STRUCTURES/JUNCTION BOXES SHALL BE JENSEN PRECAST "JUNCTION DIVERSION VAULTS" ... SEE DETAILS 1 & 2 SHEET C-612, AND DETAIL 1, SHT C-613.
3. 24-IN ... GRATE SHALL BE ADS NYLOPLAST ... DOME GRATE OR APPROVED EQUAL ... OR APPROVED EQUAL. SEE DETAIL 3, SHT C-613.
4. ... PRECAST CONCRETE MANHOLES BY JENSEN PRECAST OR APPROVED EQUAL. SEE DET. 1, 2 AND 3, SHT C-611. MANHOLES SHALL BE FITTED WITH 24-IN CAST IRON FRAMES AND LIDS CAST WITH "STORM" LETTERING. ... MANHOLES HAVE ECCENTRICALLY PLACED LIDS. ALL MANHOLES SHALL HAVE LADDER RUNGS THE FULL HEIGHT OF THE STRUCTURE. ALL MANHOLES SHALL HAVE ... SUMPS BELOW LOWEST PIPE INVERT AND SHALL NOT BE CHANNELIZED. MANHOLES ARE 48" DIAMETER UNLESS OTHERWISE NOTED.
5. TYPE "2" CATCH BASIN SHALL BE PER CITY AND COUNTY OF HONOLULU DETAIL D-6 OR APPROVED EQUAL. SEE DET. ... SHT. C-6...
6. HDPE PIPE SHALL BE CORRUGATED HIGH DENSITY POLYETHYLENE PIPE NPS 12 TO 18, IN CONFORMANCE WITH AASHTO M294 TYPE S WITH SMOOTH WATERWAY FOR COUPLING JOINTS.
7. REINFORCED CONCRETE PIPE (RCP) SHALL BE IN CONFORMANCE WITH ASTM C76, CLASS III WITH BELL-AND-SPIGOT ENDS WITH GASKETED JOINTS WITH ASTM C443 RUBBER GASKETS. WHERE BURY DEPTH EXCEEDS 22 FEET, RCP SHALL BE CLASS IV. CLASS IV PIPE SECTIONS ARE LABELED ON PROFILES. ALL STORM PIPING SHALL BE INSTALLED WITH CLASS 1 BEDDING. STORM DRAIN PIPE TRENCHING SHALL COMPLY WITH CITY AND COUNTY OF HONOLULU DETAIL D-34. SEE DET. 1, SHT. C-614. WHERE PIPE SLOPES EXCEED 20%, PROVIDE PIPE ANCHORS. SEE DET. 2, SHT. C-503.
8. MODULAR WETLANDS (VEGETATED BIOFILTERS) SHALL BE CONTECH MODULAR WETLANDS. SEE DET. 1, 2, AND 3, SHT. C-606.

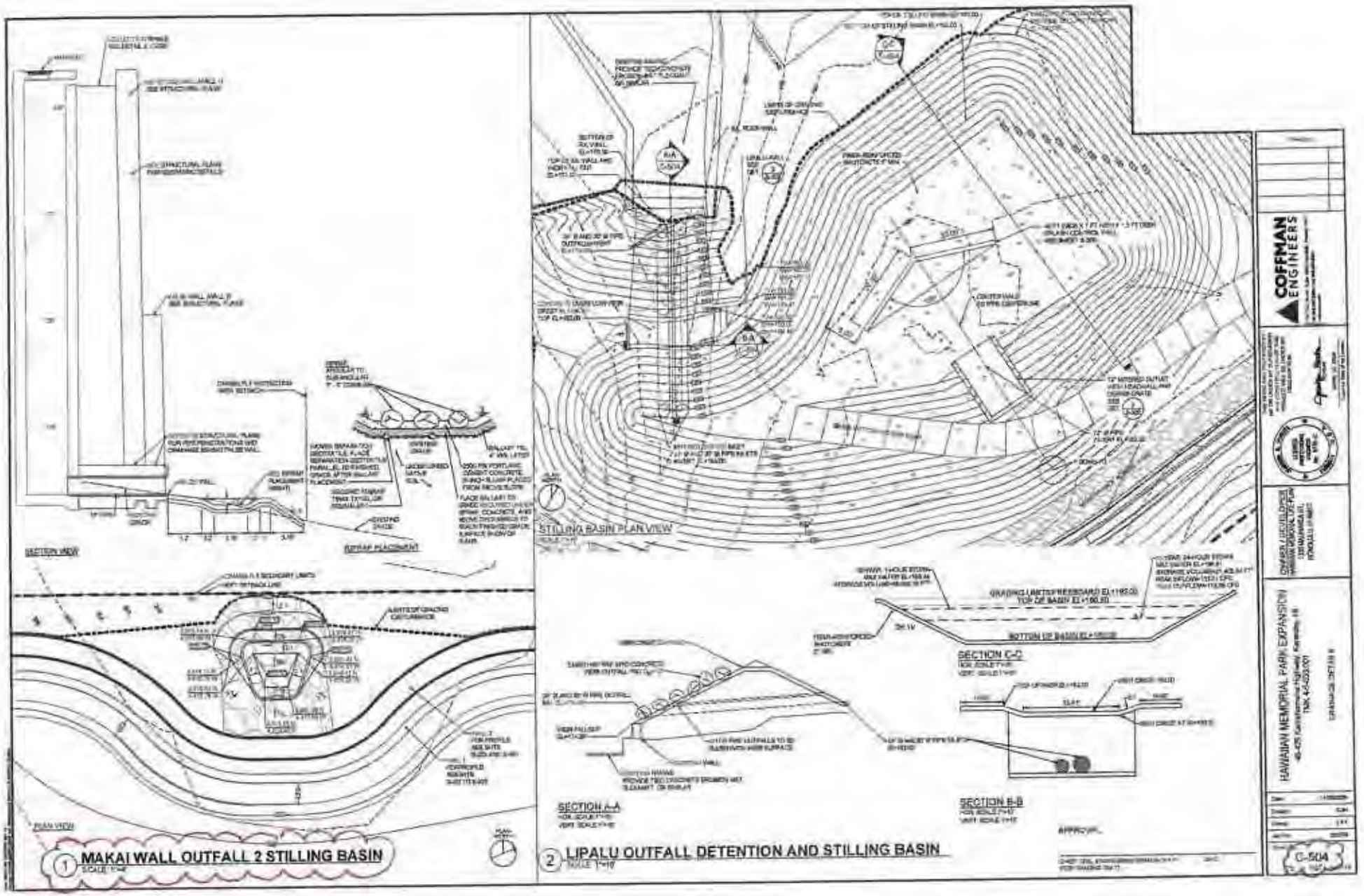
APPROVAL:

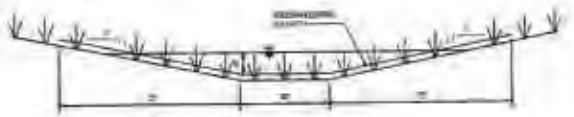
COFFMAN ENGINEERS

HAWAIIAN MEMORIAL PARK EXPANSION

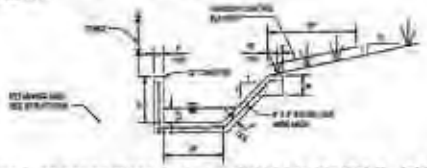
STORM DRAIN A PLAN AND PROFILE 1

CG109

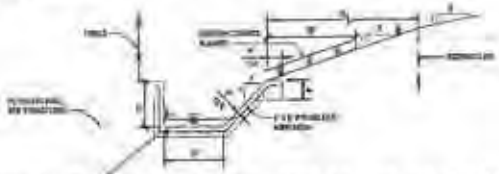

SECTION VIEW
PLAN VIEW
STILLING BASIN PLAN VIEW
SECTION A-A
SECTION B-B
SECTION C-C
1 MAKAI WALL OUTFALL 2 STILLING BASIN
2 LIPALU OUTFALL DETENTION AND STILLING BASIN
COFFMAN ENGINEERS
HAWAIIAN MEMORIAL PARK EXPANSION
C-504



1 TYP GRASS SWALE DETAIL
SCALE: NTS

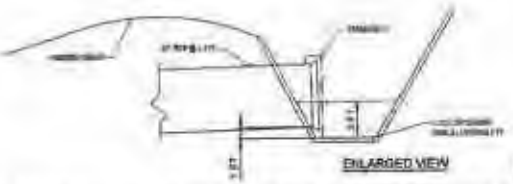


2 HMP MAKAI WALL 1 & 2 SWALE DETAIL (CONCRETE)
SCALE: NTS



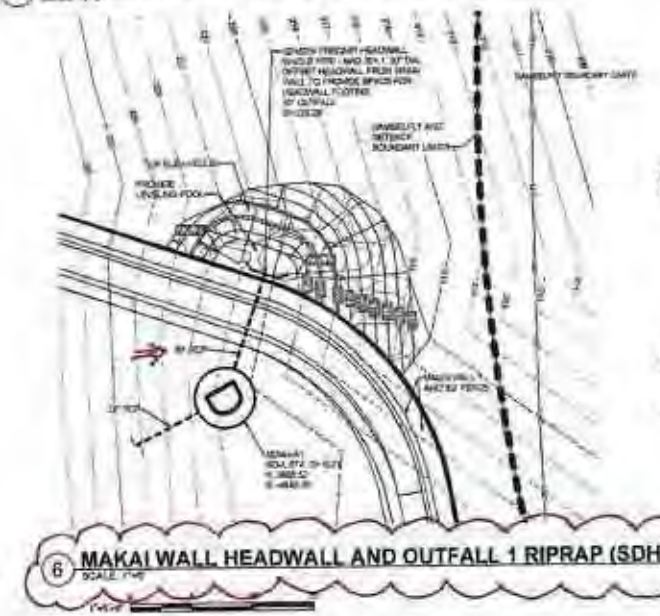
3 HMP MAKAI WALL 3 SWALE DETAIL (CONCRETE)
SCALE: NTS

4 LOWER PRESERVATION SWALE DETAIL (SHOTCRETE)
SCALE: NTS

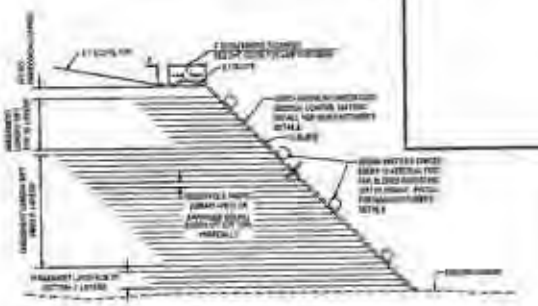


ENLARGED VIEW

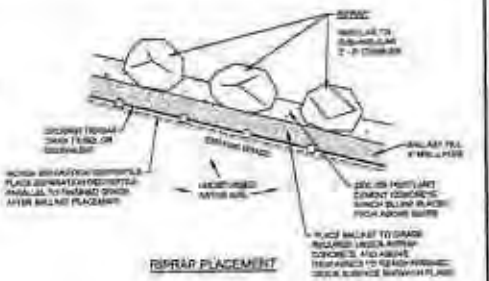
5 ROCKFALL CATCHMENT DITCH HEADWALL INLET
SCALE: NTS



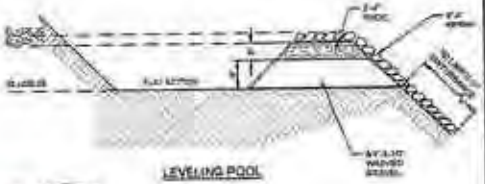
6 MAKAI WALL HEADWALL AND OUTFALL 1 RIPRAP (SDHW-A1)
SCALE: 1"=5'



7 SLOPE STABILIZATION & EROSION CONTROL MATTING
SCALE: NTS



RIPRAP PLACEMENT



LEVELING POOL

APPROVAL

COFFMAN ENGINEERS

HAWAIIAN MEMORIAL PARK EXPANSION

DRAINAGE DETAILS

C-505

Executive Summary

At 8:00 p.m. on December 31, 1987, when the National Weather Service (NWS) issued a flood warning for the eastern part of Oahu, Hawaii, few New Year's Eve revelers in the area imagined that nearly $34 million in flood damages would occur before torrential rains subsided the next morning. Although no lives were lost and the amount of damages might not be considered severe by some standards, the flooding proved significant because it occurred without warning and affected densely populated urban watershed areas.

The severe weather that caused the News Year's Eve flooding culminated an unusually wet December that had already seen more than five times the average rainfall expected for the month. Minor damage and disruption to telephone and power services had already occurred as a result of the earlier rains.

The drenching rains responsible for the New Year's Eve flood commenced about 3:00 p.m. on Thursday, New Year's Eve, but rain had fallen throughout the day. The forecast called for continued thundershower activity, with heavy downpours expected; however, the torrential rainfall and resulting floods were not anticipated even as late as 4:40 p.m., when NWS forecasters told officials of the Oahu Civil Defense Agency that there were no data to indicate an imminent threat of flooding.

The flood rains were produced by a cold front that had weakened into a shear line, a significant cloud and rain producer that acted as a center of strong low-level convergence between weak east-southeasterly winds to the south of the flood zone and fresh north or northeast winds to the north. When lifted along the southern rampart of the Koolau Mountains, this shear line produced steady rains of 2 to 4 inches per hour over the already saturated watersheds of southeastern Oahu.

Rainfall totals were impressive. In the region immediately windward of the Koolau Mountains, the precipitation was in excess of that expected for a 100-year storm (a storm of an intensity expected to recur only once every 100 years) and was probably as much as would occur in a 200-year storm. Rainfall measured more than 20 inches in many mountain locations over a 24-hour period. In many cases, accurate totals were not available, since some raingauges malfunctioned or their capacity was overwhelmed.

Two types of flooding resulted from these rains. Flash flooding occurred in the Hawaii Kai area and in Waimanalo, a relatively low-lying region. Farther north in the Kailua region, overtopping of a flood control levee produced comparatively slower but more pervasive flooding.

Reports of property damage, household evacuations, and transportation disruptions were already being fielded by police in the Hawaii Kai and Waimanalo areas by 8:00 p.m., when the NWS issued its first flash flood warning. Because of the holiday, locating emergency response personnel was difficult, but by 9:00 p.m. authorities of the Oahu Civil Defense Agency had activated their emergency operations center, had begun to respond to distress calls, and had authorized the opening of the first emergency shelter in Hawaii Kai.

Major flooding and accompanying debris flows in Hawaii Kai commenced by 9:00 p.m. Blockage of drainage systems by rocks and debris caused unanticipated diversions of floodwaters, resulting in extensive damage to many upland neighborhoods not accustomed to flooding. Meanwhile, in Waimanalo, a low-lying region, floodwaters inundated homes with up to 5 feet of swirling water at the peak of the runoff.

Flooding in Kailua began around midnight, as the levee protecting the region from the Kawainui Marsh was overtopped and canals draining the area were overwhelmed. Residents had no warning that flooding was imminent, since flash flood warnings extended only to Waimanalo, not farther up the coast, and media attention and emergency response efforts up to that time were focused on the Hawaii Kai area.

As the evening proceeded and the flooding began to displace some residents and cut transportation routes, preventing others from returning home after the evening's festivities, the Red Cross opened several shelters, eventually serving almost 1,100 people on New Year's Eve and New Year's Day.

In all, more than 1,250 homes sustained some form of damage, with over 300

CONCLUSIONS AND RECOMMENDATIONS

In general, the performance of weather forecasters was hampered by the level of technology available, resulting in a lack of adequate predisaster warnings. The unavailability of adequate radar information, the mediocre performance of the raingauge network, and the limits of satellite imagery conspired to leave forecasters without sufficient data to anticipate the flood threat.

RECOMMENDATION: The raingauge network on Oahu needs immediate improvement, including increased raingauge capacity to preclude overflows, increased raingauge density, and perhaps higher-frequency monitoring of existing telemetered raingauges.

RECOMMENDATION: Although installation of the National Weather Service's Next Generation Radar (NEXRAD) in the mid-1990s will address many of the current radar deficiencies, a near-term fix should be considered as well, such as providing the NWS with direct access to radar imagery from Hickam Air Force Base or from the University of Hawaii. Acquisition of a series of inexpensive radars such as that at the University of Hawaii for deployment throughout the island should also be considered.

The New Year's Eve flood resulted from a combination of four factors. First, heavy rains earlier in the month meant the soil was already saturated with moisture. Second, the New Year's Eve storm was an extreme weather event that resulted in 24-hour rainfall totals expected only once every 100 to 200 years. These two factors combined to generate the third factor, the real culprit in the New Year's Eve flood: copious sediment and debris that filled debris basins, blocked drainage channels, and diverted streams from their natural or man-made channels.

A fourth factor was the failure of existing flood control facilities and structures. The Kawainui Marsh was designed as a flood control reservoir, but sedimentation and a lack of systematic dredging reduced the reservoir's capacity, and the levee surrounding the marsh had settled, losing about 1 foot in height. Furthermore, design of the Oneawa Canal, which drains the reservoir, had ignored the backwater effects of ocean tidal action, and design of the debris basins, concrete channels, and roadway crossings associated with the reservoir had ignored possible debris and sediment flows.

RECOMMENDATION: Studies of the volume of debris produced from storms in

agencies, which delayed their ability to respond quickly to flood problems. In addition, the holiday created logistical problems in mobilizing and coordinating emergency personnel. Despite these difficulties, early relief and recovery efforts were generally successful due to adequate predisaster planning.

RECOMMENDATION: Emergency response exercises modeled after the Oahu holiday disaster should be conducted to identify strategies to mobilize resources as quickly as possible.

Although there were two island-wide warning systems available (an air-raid warning system and a tsunami warning system), neither was used in this instance to alert residents of a possible flood threat even though unusual circumstances may have warranted such a use.

RECOMMENDATION: Consideration should be given to enhancing the ability of the present warning systems to alert residents to monitor their radios or televisions for emergency broadcasts. In addition, attention should be given to the content of weather advisory messages and to the most effective way to transmit them to the general public.

In 1970 Honolulu began to map flood-prone areas of Oahu, and in 1980 an official flood map (a Flood Insurance Rate Map) delineating areas of flood risk was adopted as part of the National Flood Insurance Program. This map was revised in September 1987, only 3 months before the New Year's Eve event.

Based on the hazard analysis underlying this map, only about a third of the damage that actually occurred took place in areas where flooding was expected, given the characteristics of the storm. In contrast, over half of the damage that took place occurred in areas where damage was not expected in such a storm. In addition, 15 percent of the damage took place in areas that had not yet been evaluated for their flood potential, even though the map had recently been updated.

RECOMMENDATION: A reassessment of some of the flood zone designations should be conducted, especially in the Kailua area, to determine whether the current hazard designations are appropriate. In addition, flood hazard mapping efforts should be extended to those areas where flood risks are currently unevaluated.

RECOMMENDATION: Although a number of loan and grant programs were made available after the flood, an evaluation should be undertaken to determine what

UNIVERSITY of HAWAI'I® at MĀNOA

Search

VNR: 20th anniversary of UH Mānoa Flood

University of Hawai'i at Mānoa
Contact: Dan Meisenzahl, (808) 490-3268
Director , UH Communications

Posted: Oct 29, 2024

Link to video and sound (details below): https://spaces.hightail.com/receive/WfQ3qTB2tp

suggested VOSOT script below

WHAT: October 30 marks the 20th anniversary of a devastating natural disaster that struck the University of Hawai'i at Mānoa campus in 2004. Ten inches of torrential rain that caused the Mānoa Stream to overflow and flood the campus. Hamilton Library and the Biomedical Sciences Building (Biomed) were the hardest hit and 30 other buildings were also impacted, causing an estimated $80 million damage.

WHO: Hundreds of volunteers (UH staff, faculty, students and community members) worked tirelessly to assist with the cleanup and recovery, including salvaging documents, maps, research, equipment, furniture and personal items. Financial support came from FEMA, state and federal leaders including the late U.S. Sen. Dan Inouye, and private donors.

WHY: To reflect on the flood's impact, resilience of the UH community and the extensive recovery process, 20 years later.

MORE INFORMATION:

- The Hamilton Library basement, housing government documents, maps and rare historical materials, was hardest hit, up to eight feet of muddy water flooding the area.
- Total value of the lost collection at Hamilton Library was approximately $34 million.
- In 2010, Hamilton Library fully reopened after extensive repairs, and 60-80% of the lost maps and documents were replaced through donations and acquisitions.
- The Biomedical Sciences Building lost millions in critical medical research samples, equipment, furniture and more.
- The Institute for Biogenesis Research in Biomed's first floor suffered damage but was the first to rebuild within six to eight months. Cumulina, the world's first cloned mouse and now housed at the Smithsonian, was among the scientific artifacts saved.
- UH News story on Hamilton Library's recovery.
- UH News story on Biomed/JABSOM's recovery

Link to video and sound (details below): https://spaces.hightail.com/receive/WfQ3qTB2tp

B-ROLL: (1 minute, 55 seconds)

0:00-1:16 - Hamilton Library damages after the flood

1:16-1:37 - rebuilt library space at 2010 reopening event

1:37-1:55 - BioMed damages, Ryuzo Yanagimachi and cloned mouse being saved

SOUND:
Andrew Wertheimer, Library & Information Sciences Professor

(18 seconds)
When the flood happened, it seemed really all very sudden. The stream water is coming in really quickly and, we were getting on tables and one of the students luckily broke one of the windows here because that was the only way that we would have been able to get out.

(13 seconds)
It's still a little bit of a stressful memory, but it certainly bound us together and it showed us the power of the 'aina and the power of libraries to, heal, recover and transform.

VOSOT Script

INTRO
October 30 marks the 20th anniversary of a devastating flood that swept through the University of Hawai'i at Mānoa, causing $80 million in damages, especially Hamilton Library and the Biomedical Sciences Building.

Hundreds of volunteers, including UH and community members helped with cleanup and recovery, which took years.

VO

Andrew Wertheimer, Library and Information Sciences associate professor, was teaching a weekend class in the library when flood waters spilled into the basement.

SOT
(Andrew Wertheimer, Library & Information Sciences associate professor)

(1:56-2:14)
<"When the flood happened, it seemed really all very sudden. The stream water is coming in really quickly and, we were getting on tables and one of the students luckily broke one of the windows here because that was the only way that we would have been able to get out.">

VO
Hamilton Library fully reopened almost 6 years later after extensive repairs, recovering 60-80% of lost maps and documents.

The Institute for Biogenesis Research, heavily damaged in the Biomed building, was rebuilt within eight months. Cumulina, the world's first cloned mouse and now part of the Smithsonian collection, was among the artifacts saved.

The historic flood prompted changes to campus preparedness.

MATSUBARA, KOTAKE & TABATA

BENJAMIN M. MATSUBARA
CURTIS T. TABATA

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HONOLULU, HAWAII 96813
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May 15, 2025

Mr. Daniel E. Orodenker, Executive Officer
Land Use Commission, State of Hawai`i
235 S. Beretania Street, Room 406
Honolulu, Hawai`i 96813

Re: LUC No. A17-804 Hawaiian Memorial Life Plan, Ltd.; 2025 Status Report

Dear Mr. Orodenker:

This letter is a follow-up to my letter dated April 7, 2025.

Coffman Engineers, Inc. has provided additional documents that have been submitted to the grading permit application submissions. I am told that the additional documents include an update to the notes on sheet G-002.

Again, the enclosed CD is being copied to all parties herein, and 3 CDs are being provided to Grant Yoshimori for distribution to Julie and Richard McCreedy and John Higham.

Very truly yours,

MATSUBARA, KOTAKE & TABATA

Curtis T. Tabata

Curtis T. Tabata

Enclosures

EXHIBIT "13"

cc: Intervenor Hui O Pikoiloa c/o Grant Yoshimori
Benjamin M. Matsubara, Esq.
Jay Morford, President, Hawaiian Memorial Life Plan, Ltd.
Dawn Takeuchi Apuna, Director, Department of Planning and Permitting, City and County of Honolulu
Richard and Julie McCreedy
John Higham
Mary Alice Evans, Director, Office of Planning and Sustainable Development, State of Hawai`i
Alison Kato, Esq., Deputy Attorney General, Department of the Attorney General, State of Hawai`i
Pono Arias, Esq., Deputy Corporation Counsel, Corporation Counsel, City and County of Honolulu

Grant Yoshimori
45-464 Lipalu St
Kaneohe, HI 96744

May 17, 2025

Mr. Daniel Orodenker, Executive Officer
Land Use Commission, State of Hawaii
PO Box 2359
Honolulu, HI 96804

Dear Mr. Orodenker:

The Intervenors thank the Commission for helping facilitate the compliance with A17-804 Hawaiian Memorial Life Plan's Decision and Order #2. We also thank the Petitioner for providing the requested grading permit application information.

We have concerns stemming from the newly shared documents, as well as stemming from the Petitioner's recent forest clearing.

Forrest Clearing

The Petitioner began extensive "Tree Clearing activities" on April 14, which "utilize heavy equipment such as excavators". They stated that "This action is not considered ground disturbing by the City and County of Honolulu.". This clearing is exposing a lot of soil (photo below as of 5/17 showing only a portion of the forest clearing).

2007 **5/17/2025**

Questions we have:

- Can Petitioner design for additional on-site water retention beyond the LUC's requested MINIMUM (per Finding of Fact 273)?

  Mr. Higham has reviewed the Petitioner's newly-shared design documents and has submitted some suggestions to Coffman Engineers. He strongly recommends increasing the amount of water being retained on the property above the currently LUC-mandated MINIMUM of 10-year 24-hour event. He cited several recent Hawaii cases where drainage systems have been overloaded, resulting in catastrophic consequences.

- Should the sediment traps be built OUTSIDE the 150' residential buffer?

  Finding of Fact #317 states that the KPSCP requires "a buffer of 150 feet from nearby residential property lines"

  The design documents show two of the proposed Sediment Traps designed *IN* the required 150' buffer between the development and residential properties.

  Should the sediment traps be OUTSIDE the buffer to comply with FF #317?

- When will the LUC-mandated erosion and sedimentation control improvements be installed to manage excess runoff from the forest clearing?

  Decision and Order Condition #6, states "Petitioner, shall at the start of construction, install erosion and sediment controls and retention/detention basis ***prior to the clearing*** and grubbing of the site" [emphasis added]

  There is no evidence, or communication of erosion and sedimentation control being done.

  We are very concerned that this violation will risk flooding to our neighborhood – especially given the upcoming hurricane season.

- When is the Grading Permit approval expected?

  If the approval is delayed, there will be nothing to capture soil erosion until the application is approved and construction begins. The October 2024 Annual Status report said the projected Grading Permit Approval date was February 2025, which has passed.

- What is the projected start of the development?

  If sedimentation control is dependent on project-start, when will construction begin? The October 2024 Annual Status report said the projected construction start date is April 2025, which has passed.

- Can there be more community communication beyond a blog post to www.hmpfacts.com?

  Condition No. 15 requires Community Outreach. However, my neighbors and I have not received any communication regarding the project description nor timelines.

  Many in the neighborhood and community are unaware of the project; asking me things like: “what are they doing?”, “what’s being built?”, “how big will the development be?”, “Is it a landslide?”, “when is it going to be done?”, “did they get approval for that?”

  The October 2024 Annual Status report states that the Petitioner did a mailing in March of 2022. Since then, we have only seen two postings on a SUB-page of HMPFacts.com.

We are hoping that the Petitioner can provide a response to our questions either through an Interim Annual Report or via the scheduled Status Hearing.

Thank you.

Sincerely,

Grant Yoshimori

CC: Benjamin M. Matsubara
Curtus Tabata
Jay Morford
Dawn Takeuchi Apuna
Rich and Julie McCreedy
John Higham
Senator Jarrett Keohokalole
Representative Mike Lee
Councilmember Esther Kia‘āina

COFFMAN ENGINEERS

May 29, 2025

Mr. John Higham
johnlhigham@gmail.com
Ph. 808-291-8380

Mr. Higham,

As stated in my previous response, our team is delivering a project that complies not only with the current design guidelines that are imposed upon any project on this island by City and County of Honolulu but also the extend conditions that were put in place by the State of Hawaii Land Use Commission. The design meets the Standard of Care expected for any design project. Your concern about a future storm that is only a matter of time is appreciated; however, the same storm may have more serious consequences to the downstream neighbors if the project is not built.

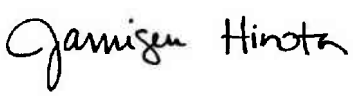
In response to your letter dated April 28, 2025, I offer the following comments on the three sediment traps you suggest should remain in place:

As you noted, Trap #2 is located in a natural gully upstream of the last home on the west side of Lipalu St. Upon the completion of construction, this area will sit below the proposed retaining wall #3 shown in the construction drawings. Runoff flowing into this gully will be cut-off by the proposed wall and directed into the new drainage system discharging into the Lipalu St outlet. Converting this trap to a detention basin will provide little benefit to the neighbors because little to no runoff will enter this area.

In the proposed condition, Sediment Trap #3 is located directly behind retaining wall #2. The runoff behind the wall will be collected in a concrete swale and conveyed to the proposed drainage system. The existing grades in this area are approximately 40' lower than the proposed grade. Leaving the trap in place is not possible given the amount by which we will be raising the grade and the new retaining wall that will be constructed. Building a new detention basin in this area will have a direct impact on the amount of developable land available to HMP in an area where the improvements have already been shown to reduce the runoff to adjacent neighbors.

Similar to the condition noted above, Sediment Trap #4 is located directly behind retaining wall #1. The new wall will have a concrete swale directing water directly into a storm drain manhole and through the existing outfall. The existing grades in this area are approximately 20' lower than the proposed grade. Leaving the trap in place is not possible given the amount by which we will be raising the grade and the new retaining wall that will be constructed. Constructing a new detention basin in this area will have a direct impact on the amount of developable land available to HMP in an area where the improvements have already been shown to reduce the runoff to adjacent neighbors.

Sincerely,
COFFMAN ENGINEERS, INC.



Jamisen Hirota, P.E.
Principal, Civil Engineering

COFFMAN ENGINEERS

May 29, 2025

Mr. Jay Morford
President
Hawaiian Memorial Life Plan, Ltd.
1330 Maunakea Street
Honolulu, HI 96817

Dear Jay,

This letter is a response to the letter written by Mr. Grant Yoshimori to Mr. Daniel Orodenker, Executive Officer, Land Use Commission on May 17,2025. These responses are to the engineering-related questions posed by Mr. Yoshimori.

Page 2, Question #1

Can Petitioner design for additional on-site water retention beyond the LUC's requested MINIMUM (per Finding of Fact 273)?

Mr. Higham has reviewed the Petitioner's newly-shared design documents and has submitted some suggestions to Coffman Engineers. He strongly recommends increasing the amount of water being retained on the property above the currently LUC-mandated MINIMUM of 10-year 24-hour event. He cited several recent Hawaii cases where drainage systems have been overloaded, resulting in catastrophic consequences.

The design of stormwater improvements for the project complies with City and County of Honolulu's current grading ordinance, current Rules Relating to Water Quality, and current Storm Drainage Standards in as well as the additional criteria above and beyond what is required by the authority having jurisdiction put upon the project by the LUC at the Petitioner's request (10-year, 24-hour). For D&O Condition #5, the proposed flow is 21% less than the existing flow for the 10yr-24hr storm event. This exceeds the LUC minimum requirement.

Page 2, Question #2

Should the sediment traps be built OUTSIDE the 150' residential buffer?

Finding of Fact #317 states that the KPSCP requires "a buffer of 150 feet from nearby residential property lines"

The design documents show two of the proposed Sediment Traps designed *IN* the required 150' buffer between the development and residential properties.

Should the sediment traps be OUTSIDE the buffer to comply with FF #317?

The buffer/setback is inteded to restrict cemetery expansion, not for drainage improvements related to the project. Temporary sediment traps will be removed from the buffer area at the completion of the project.

Page 2, Question #3

When will the LUC-mandated erosion and sedimentation control improvements be installed to manage excess runoff from the forest clearing?

Decision and Order Condition #6, states “Petitioner, shall at the start of construction, install erosion and sediment controls and retention/detention basis **prior to the clearing** and grubbing of the site” [emphasis added]

There is no evidence, or communication of erosion and sedimentation control being done.

We are very concerned that this violation will risk flooding to our neighborhood – especially given the upcoming hurricane season.

Best Management Practices (BMPs) are not required by the City and County of Honolulu for tree cutting activities. A permit is not required to conduct tree cutting activities. We understand you have instructed the Contractor to install non-ground disturbing BMPs as a courtesy to the adjacent properties until such time as the grading permit is issued and additional BMPs are installed prior to the start of ground disturbance.

Page 2, Question #4

When is the Grading Permit approval expected?

If the approval is delayed, there will be nothing to capture soil erosion until the application is approved and construction begins. The October 2024 Annual Status report said the projected Grading Permit Approval date was February 2025, which has passed.

The grading permit review is continuing at the City and County of Honolulu, Department of Planning and Permitting. Grading permit approval is anticipated in the summer of 2025. The time of approval cannot be guaranteed however.

Page 3, Question #1

What is the projected start of the development?

If sedimentation control is dependent on project-start, when will construction begin?

The October 2024 Annual Status report said the projected construction start date is April 2025, which has passed.

The project will commence development upon approval and acquisition of the required permits. With the expected approval of permits to be completed in summer of 2025, project commencement is anticipated shortly after that period.

Please let me know if I can be of further assistance in addressing these questions and concerns.

Sincerely,
COFFMAN ENGINEERS, INC.

Jamisen Hirota, P.E.
Principal, Civil Engineering

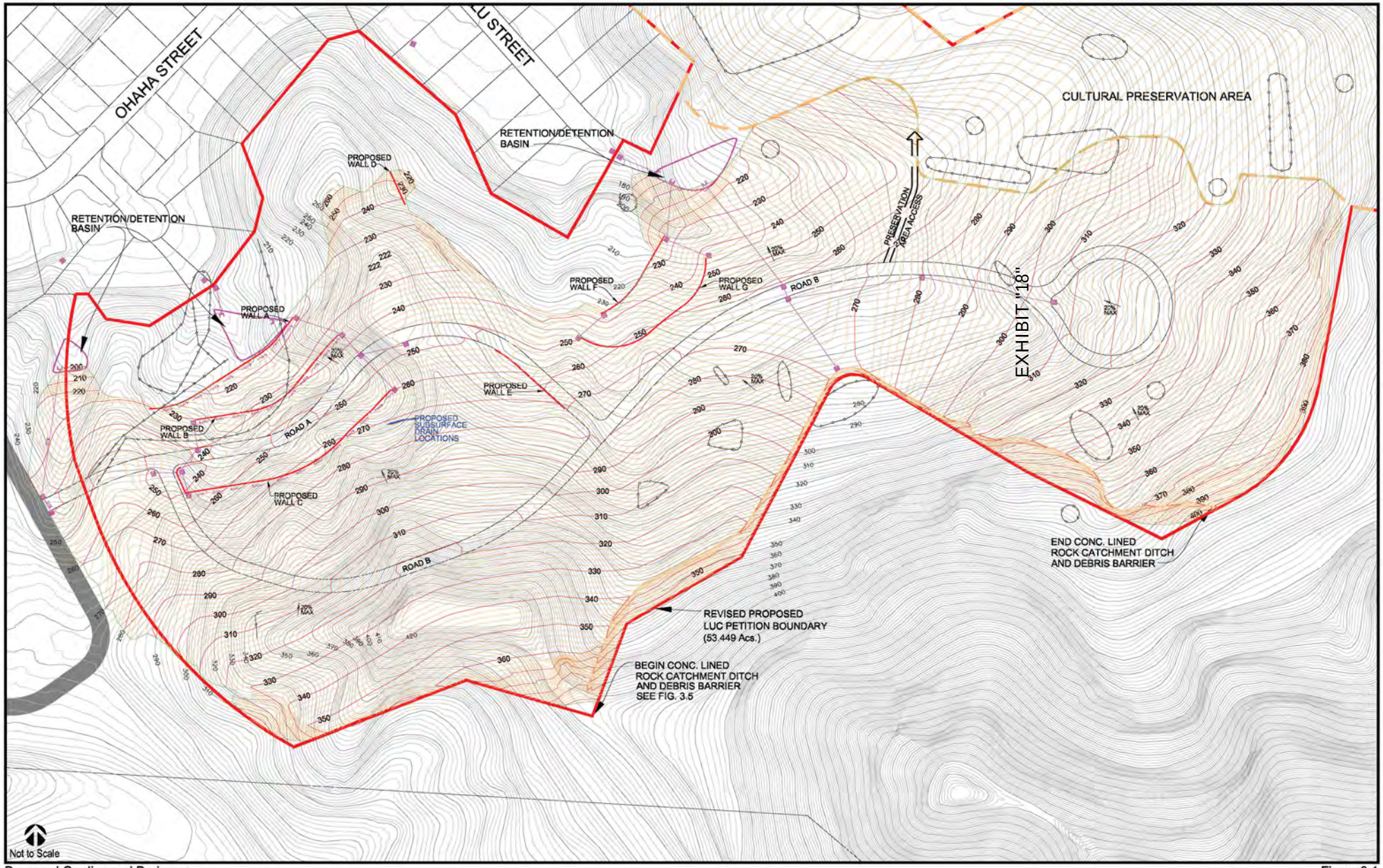
- Any proposed expansion by Hawaiian Memorial Park must include a 150-foot buffer from residential homes, a 2,000-foot buffer from the Pohai Nani senior living community, and a phased approach to sales and marketing to ensure that the land adjacent to the residential homes on Lipalu Street is the last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

  Discussion: The buffer areas identified under this policy are guidelines and conceptual schemes that serve as a policy guide for public and private sector investment decisions under the *Ko'olau Poko SCP*. It should be clarified that this policy is not regulatory, and instead provides a coherent vision to guide developments. Therefore, the proposed buffers shown on the plans in Section 2.2 are consistent with this policy. An approximately 150-foot buffer is provided separating residences from the cemetery expansion. 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.

  Buffer distances in the SCP were based upon general conceptual plans and information submitted to the City Council during the SCP update process. The purpose for revising initial cemetery expansion concept plans throughout that review process was to address "visual concerns" expressed by Pohai Nani residents even though private views are not protected by any State or City statutes. DPP has consistently supported this position over the years. As an example, an adjacent homeowner could construct a new dwelling that would block a neighbors prior views, without interference by government.

  Further, the 2,000-foot buffer language in the SCP was included by the Council Planning and Transportation committee based upon conceptual plans provided to the committee that stated the distance was approximate. Throughout that 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 consistent with the intent for this policy. The project plans in the Final EIS reflect a configuration necessary to create a cemetery expansion providing for the 28.2 acres that is provided for under the SCP's cemetery guidelines. Therefore, based upon these factors, current project plans are consistent with the policy associated with the buffer guideline.

  Burials within the Cultural Preserve are not subject to the visual buffer distance from Pohai Nani because these actions would be conducted as part of traditional native Hawaiian cultural practices following traditional protocols as discussed in Section 2.2.4 of the Final EIS. 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



Proposed Grading and Drainage

Figure 3.1

Hawaiian Memorial Park Cemetery Expansion Project
Kaneohe, Oahu, Hawaii

§ 18A-1.3 Definitions.

For the purposes of this chapter, the following definitions apply unless the context clearly indicates or requires a different meaning.

Best Management Practices or ***BMPs.*** Structural devices or nonstructural practices employed at construction sites that are designed to contain stormwater on-site and prevent the discharge of pollutants from entering any drainage facility or any State waters or to redirect storm runoff flow. ***BMPs*** may include a schedule of activities, the prohibition of practices, maintenance procedures, and other management practices to accomplish the same.

Chief Engineer. The director and chief engineer of the department of facility maintenance, City and County of Honolulu, or such person's duly authorized representative.

Conservation Program. A document submitted by a land user containing information for the conservation of soil, water, vegetation, and other applicable natural resources for an area of land currently being implemented and maintained.

Director. The director of planning and permitting or the director's duly authorized representative.

Earth Material. Any one or more of the following: rock, coral, sand, gravel, soil or fill, or any combination thereof.

Engineer. A person duly registered as a professional engineer in the State of Hawaii.

Engineer's Soils Report. A report on soils conditions prepared by an engineer qualified in the practice of soils mechanics and foundations engineering.

Engineering Slope Hazard Report. A report that uses the application of engineering and geologic knowledge and principles in the investigation, evaluation, and mitigation of hazards posed by potential rock, soil, or other slope movement.

Erosion. Wearing away of the ground surface as a result of action by wind or water, or both.

Excavation or ***Cut.*** Any act by which earth material is cut into, dug, or moved, and shall include the conditions resulting therefrom.

Fill. Any act by which earth materials are placed or deposited by artificial means, and shall include the resulting deposit of earth material.

Grading. Any excavation or fill or any combination thereof.

Grubbing. Any act by which vegetation, including tree, timber, shrubbery, and plant, is dislodged or uprooted from the surface of the ground.

Maximum Extent Practicable or ***MEP.*** Economically achievable measures for the control of the addition of pollutants from existing and new categories and classes of nonpoint sources of pollution, which reflect the greatest degree of pollutant reduction achievable through the application of the best available nonpoint pollution control practices, technologies, processes, siting criteria, operating methods, or other alternatives.

National Pollutant Discharge Elimination System Permit or ***NPDES Permit.*** The permit issued to a permittee pursuant to 40 CFR Part 122, Subpart B, § 122.26(a)(1)(ii), for construction activity including clearing, grading, and excavation activities; or a permit issued to a permittee pursuant to Hawaii Administrative Rules, Chapter 11-55, "Water Pollution Control" for construction dewatering activity; or a permit issued to the city pursuant to 40 CFR Part 122, Subpart B, § 122.26(a)(1)(iii), for stormwater discharges from the city's separate storm sewer systems.

Permittee. The person or party to whom the permit is issued and shall be the owner or developer of the property whether it is a person, firm, corporation, partnership, or other legal entity responsible for the work.

Soil and Water Conservation Districts. The legal subdivisions of the State of Hawaii authorized under HRS Chapter 180.

State Waters. Has the same meaning as defined in HRS § 342D-1.

Stockpiling. The temporary open storage of earth materials in excess of 100 cubic yards upon any premises except the premises upon which a grading permit has been issued for the purpose of using the material as fill material at some other premises at a future time.

Surveyor. A person duly registered as a professional land surveyor in the State of Hawaii.

Wetland. Has the same meaning as defined in Chapter 25.

(Sec. 23-1.3, R.O. 1978 (1983 Ed.)) (1990 Code, Ch. 14, Art. 13, § 14-13.3) (Am. Ords. 92-122, 96-34, 04-27, 17-28)

JAMISEN HIROTA, PE, LEED BD+C
Honolulu Office Operations Manager
Principal, Civil Engineering

Jami is the Operations Manager and a Civil Engineering Principal in Coffman's Honolulu office, where she leads a fast-growing department backed by 28 years of experience in the design industry. As Operations Manager, Jami champions a team of technical and administrative professionals dedicated to clients success. These responsibilities include oversight of the marketing and project management departments, company initiatives in federal markets, culture, and employee benefits.

Before joining Coffman in 2018, Jami spent 22 years at a small, family-owned consulting firm, where she gained a comprehensive understanding of the consulting business. As an early participant in Design Build, she collaborated closely with contractors to develop winning bids and deliver on-time, on-budget projects. Many of the clients and teammates she early in her career remain her trusted partners today.

Her design expertise in site development covers a wide range of markets, including private, state, and city, as well as multiple sectors of the federal government. Jami's career is anchored in building and maintaining long-term industry relationships, many of which span over two decades. She is known for going the extra mile to truly understand her clients' needs and deliver successful, impactful projects.

A few notable projects throughout her career include:
- Pacific Command Headquarters Building, Camp Smith, Oahu
- Punahou School Omidyar K1 campus, Kosasa Grades 2-5 campus, & Mamiya Science Center
- Diamond Head Theatre
- Historic Navy Lodge Renovation
- Redevelopment of 2500+ Army Family Housing Units throughout Oahu

Beyond her project work, Jami is deeply committed to mentoring the next generation of engineers. She prioritizes team development and leadership growth, with a strong focus on succession planning. Joining Coffman was a deliberate choice—she sought a firm that values, promotes, and rewards employee success.

Professional Experience
- 6 Years with Coffman Engineers, Inc.
- 22 Years with Other Firms

Education
- Bachelor of Science in Civil Engineering, Purdue University, 1995

Professional Registrations & Other Certifications
- Hawaii, Civil Engineer, #9776
- LEED BD+C Accredited Professional

Professional/Community Activities

- Resilience Committee Chair, American Council of Engineering Companies of Hawaii (ACECH)
- American Society of Civil Engineers (ASCE)
- Society of American Military Engineers (SAME)
- Society of Women Engineers (SWE)
- Hawaii Society of Business Professionals (HSBP)
- NAIOP Commercial Real Estate Development Association
- Development Committee Chair, Friends of Lyon Arboretum

BEFORE THE LAND USE COMMISSION

OF THE STATE OF HAWAI`I

In the Matter of the Petition of	)	DOCKET NO. A17-804
	)	
HAWAIIAN MEMORIAL LIFE PLAN, LTD.	)	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 Kāne'ohe, Island of Oahu, State of	)	
Hawai`i, Tax Map Key: (1) 4-5-033: por. 001	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that an e-timestamp copy of the foregoing document was duly served upon the following **AS INDICATED BELOW** on June 10, 2025.

ALISON KATO, ESQ. — HAND-DELIVERY
Deputy Attorney General
Department of the Attorney General, State of Hawai`i
425 Queen Street
Honolulu, Hawai`i 96813

MARY ALICE EVANS, DIRECTOR — HAND-DELIVERY
RUBY M. EDWARDS
AARON H. SETOGAWA
Office of Planning and Sustainable Development,
State of Hawai`i
235 South Beretania Street, Room 600
Honolulu, Hawai`i 96813

DAWN TAKEUCHI-APUNA, DIRECTOR DINA WONG Department of Planning and Permitting City and County of Honolulu 650 South King Street, 7th Floor Honolulu, Hawai`i 96813	HAND-DELIVERY
BRAD TAMIO SAITO, ESQ. PONO ARIAS, ESQ. Deputies Corporation Counsel Department of Corporation Counsel 1001 Bishop Street, Suite 2020 Honolulu, Hawai`i 96813	HAND-DELIVERY
HUI O PIKOILOA, an unincorporated Association, LIANNE CHING, BETTYE HARRIS, RICHARD MCCREEDY, JULIANE MCCREEDY, JESSE REAVIS, and GRANT YOSHIMORI c/o 45-464 Lipalu Street Kaneohe, HI 96744	CERTIFIED MAIL RETURN RECEIPT REQUESTED

DATED: Honolulu, Hawai`i, June 10, 2025.

Of Counsel:
MATSUBARA, KOTAKE & TABATA
A Law Corporation

BENJAMIN M. MATSUBARA
CURTIS T. TABATA
Attorneys for Petitioner
HAWAIIAN MEMORIAL LIFE PLAN, LTD.