

## 12.0 PARTIES CONSULTED DURING THE PREPARATION OF THE FINAL ENVIRONMENTAL IMPACT STATEMENT

### 12.1 PARTICIPANTS IN THE FEIS PREPARATION PROCESS

The Hawaiian Memorial Park Cemetery Expansion FEIS was prepared for the Petitioner, Hawaiian Memorial Life Plan Ltd. by Helber Hastert & Fee, Planners. The following list identifies individuals and organizations involved in the preparation of this report and their respective contributions.

#### Helber Hastert & Fee, Planners

Scott Ezer	Principal-in-Charge
Rachael Edinger	Principal Author
Rob James	Geographic Information System Specialist
Lori Chun	Graphic Design

#### Technical Consultants

##### Subject

Market Assessment  
Slope/Rock Hazard Study  
Civil Engineer/Drainage Report  
Botanical Resources Assessment  
Avifaunal and Feral Mammal Field Survey  
Invertebrate Survey  
Archaeological Inventory Survey  
Air Quality Impact Assessment  
Noise Review  
Cultural Impact Assessment  
Traffic Impact Study  
TMDL Analysis  
Cemetery Planning and Design

##### Consultant

Clark & Green Associates  
Shinsato Engineering, Inc.  
SSFMI International, Inc.  
LeGrande Biological Surveys, Inc.  
Philip L. Bruner  
Steven Lee Montgomery, Ph.D.  
Cultural Surveys Hawai'i, Inc.  
B.D. Neal & Associates  
D.L Adams Associates, Ltd.  
Cultural Surveys Hawai'i, Inc.  
Perazim Consulting LLC  
Element Environmental LLC  
Clark & Green Associates

### 12.2 PARTIES CONSULTED DURING THE PREPARATION OF THE FEIS

Notice of the DEIS was published in the June 6, 2008 edition of the *Environmental Notice*. Copies of the DEIS were distributed to 73 agencies, organizations, individuals, and libraries, listed below. The deadline for public comments was July 23, 2008. A total of 148 written comments were received during the public comment period. The agencies, organizations, and individuals who submitted written comments are identified below with an asterisk (\*). Parties identified by a double asterisk (\*\*) were not on the original mailing list but sent in comments or requested to be considered a consulted party. Comments and applicant response letters are reprinted on the following pages.

#### Federal Agencies

Dept. of Agriculture, Natural Resources Conservation Service\*  
Dept. of the Interior, Fish & Wildlife Services  
Dept. of the Interior, U.S. Geological Survey\*  
U.S. Army Corps of Engineers

State Agencies

Dept. of Accounting & General Services\*  
Dept. of Agriculture  
Dept. of Business, Economic Development & Tourism  
Dept. of Business, Economic Development & Tourism, Energy, Resources & Technology  
Division\*  
Dept. of Business, Economic Development & Tourism, Office of Planning  
Dept. of Defense\*  
Dept. of Hawaiian Home Lands  
Department of Health, Environmental Planning Office\*  
Dept. of Land & Natural Resources\*  
Dept. of Land & Natural Resources, State Historic Preservation Division\*  
Dept. of Transportation\*  
Land Use Commission\*  
Office of Environmental Quality Control  
Office of Hawaiian Affairs\*  
UHM Environmental Center\*  
UHM Water Resources Research Center

City and County of Honolulu Agencies

Board of Water Supply\*  
Dept. of Community Services  
Dept. of Design & Construction\*  
Dept. of Environmental Services  
Dept. of Facility Maintenance\*  
Dept. of Parks & Recreation\*  
Dept. of Planning & Permitting\*  
Dept. of Transportation Services\*  
Honolulu Fire Dept.\*  
Honolulu Police Dept.

Public Utilities

Hawaiian Electric Company\*  
Hawaiian Telcom

Libraries

Dept. of Business, Economic Development & Tourism Library  
Hawaii State Library Hawaii Documents Center  
Honolulu Dept. of Customer Service  
Kailua Public Library  
Kaneohe Public Library  
Legislative Reference Bureau Library  
UH Manoa Hamilton Library

Media

Editor Honolulu Advertiser  
Editor Honolulu Star Bulletin

Other Agencies, Organizations, and Individuals

Kailua Neighborhood Board #31\*  
Kaneohe Neighborhood Board #30  
Representative Ken Ito\*  
Senator Jill Tokuda\*  
Representative Cynthia Thielen  
Councilmember Barbara Marshall  
Kaneohe Outdoor Circle  
Sierra Club, Hawai'i Chapter  
Queen Lili'uokalani Children's Center, Ko'olau Poko Unit  
O'ahu Island Burial Council  
Hui Mālama I Nā Kūpuna O Hawai'i Nei  
Ko'olau Poko Hawaiian Civic Club\*  
Livable Hawaii Kai Hui  
Hawai'i's Thousand Friends\*\*  
Grant Yoshimori\*  
Rich McCreedy\*  
Julianne McCreedy\*  
Charlie Ogata  
Donna Camvel  
Ed Birdsong\*  
Richelle and Aldon Kim  
Kathleen O'Malley\*  
Gary Gray\*  
Liam Gray\*  
Lianne Ching\*  
Eric Nakagawa  
Ernest Harris  
Mavis Suda  
Todd Cullison  
LJ Moana Lee\*  
Nick Brazell  
Patrick F. Kudlich  
Mark Moses  
Marni Murdock  
Rev. Ricky Bermudez\*\*  
Mark Lutwak and Y. York\*\*  
Karen Galut\*\*  
Judith Lemus\*\*  
Jeannine Johnson\*\*  
Lovell F. Kaleikini\*\*  
Darryl Barilla & Malia Van Heukelem\*\*  
Glen M. Root\*\*  
Andrew Johnson\*\*  
Kathy Seiple\*\*  
Marco DiBartolomeo\*\*  
Lisa Pimental-Dias\*\*  
Brent Yuen\*\*  
Danny Gomez\*\*

Neal Nakamura\*\*  
Alvin Lau\*\*  
Amparo Padilla Lau\*\*  
Robert Tom\*\*  
Inez Kaneshiro\*\*  
Valerie Tsutsumi\*\*  
Richard and Estella Hoag\*\*  
Kay Mendes\*\*  
Michaela Arume\*\*  
Karen and Manuel Vidinha\*\*  
Agnes Char\*\*  
William N. Rodenhurst\*\*  
Carol Liu\*\*  
Carol Fontanive\*\*  
Arlene B. Rodenhurst\*\*  
Ruth Hirai\*\*  
Thomas Boaz\*\*  
Donna Rodenhurst\*\*  
Stanley Wanelson\*\*  
John W. Kapiko Jr.\* \*  
Allen Breed\*\*  
William C. Vinet, Jr.\*\*  
Henry Liljedahl\*\*  
Jamie Walk\*\*  
Ernest Kalani Makainai\*\*  
Char Reavis\*\*  
Patricia Gardner\*\*  
Cindy DiBartolomeo\*\*  
Wendi Nakagawa\*\*  
Dennis Jones\*\*  
Janice Imamura\*\*  
Mary Louise O'Brien\*\*  
Nicolas Martinot\*\*  
Violet Kaili\*\*  
Pomai Uchibori\*\*  
J. Yazaki\*\*  
Darrin Yazaki\*\*  
Melva Kujubu\*\*  
Stanley Kawakami\*\*  
Margaret Silva\*\*  
Wilbur and Amy Tanaka\*\*  
Gregg Stoyer\*\*  
Wesley H. Urada\*\*  
Susan McBride\*\*  
Dudley Dias\*\*  
Romi Duran\*\*  
Myina Arume\*\*  
Betty Jo Harris\*\*  
Gena Williams\*\*  
Cheryl Reavis\*\*

Gary Reavis\*\*  
Karl Reavis\*\*  
Jesse Reavis\*\*  
Leonora Reavis\*\*  
Ka'ano'i Walk\*\*  
Dan Williams\*\*  
Ty hi Hooper\*\*  
Angel Lemus\*\*  
Lawrence K.W. Smith III\*\*  
Paulette A. Tam\*\*  
Diane Maxwell\*\*  
Barbara Duran\*\*  
Tina Makainai\*\*  
John Bennett\*\*  
Leslie Tom\*\*  
JoAn W. Boggs\*\*  
Hana Fryes\*\*  
Annie Lee Vuillemot\*\*  
Jacklyn Flame\*\*  
Muriel E. Coleman\*\*  
James E. Drorbaugh\*\*  
Eleanor Nagamoto\*\*  
Carissa Yoshimori\*\*  
Robin Okubo\*\*  
Jean Wittmaack\*\*  
Irene H. Breed\*\*  
Elizabeth A. Porter\*\*  
Kimberly Imamura\*\*  
Mary Graves\*\*  
Virginia Jordan\*\*  
Katherine Martin\*\*  
Virginia S. Naquin\*\*  
Marguerite S. Peach\*\*  
Nellanette Y. Araki\*\*  
Tha G. Wai\*\*  
Eleanora Lindo\*\*  
Elizabeth S. Marr\*\*  
Robert C. and Martha F. Hockaday\*\*  
Henry Adachi\*\*  
Peter and Bella Swenson\*\*  
David A. Krupp\*\*  
Puanani Akaka\*\*  
William H. and Ellen L. Akaka\*\*  
Martin and Sharron McMorrow\*\*

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
June 9, 2008  
Page 2

Jeannine Johnson  
5648 Pia Street, Honolulu, Hawaii, 96821  
Phone: 373-2874 (h) / 523-5030 (w)  
June 9, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Re: **TMK:** 1-4-05-033:portion of 001  
**Applicant:** Hawaiian Memorial Life Plan, Ltd.

Dear Mr. Morford:

Although both of my parents are buried at Hawaiian Memorial Park, I strongly oppose Hawaiian Memorial Life Plan's application to reclassify approximately 56.6 acres of land at Kāne'ōhe from the State Conservation Land Use District into the Urban Land Use District in order to develop a residential subdivision.

Your development project is outside the Kōloaupo Sustainable Communities Plan's Urban Growth Boundary and part of the Oneawa Hills area, which the Kōloaupo Sustainable Communities Plan states should be specifically excluded from the Urban Growth Boundary. As you may know, Conservation District lands are the most valuable in the State because they are critical watershed areas, house the highest number of threatened and endangered (more than any given region in the United States), stabilize vulnerable steep slopes from landslides, flooding, and provide coral reef protection. There is increasing pressure to develop what little remains of the State's natural areas and resources. **Nearly two-thirds** of Hawai'i's original forest cover, and many associated plant and animal species have been converted to agricultural and urban uses. As the center of Hawai'i's population and urban development, O'ahu's forest resources have been depleted to a greater extent than any of the other islands. It is therefore vital to the future generations of residents of the City and County of Honolulu that we protect our Conservation land to preserve water quality and our water supply.

Your development project also causes significant safety concerns for the residents of your planned subdivision. The watersheds and slopes of Hawai'i are the setting for a process geologists call mass wasting, where heavy clumps of rock and soil unninge from a hill and slide, tumble, and ooze downwards under the unending influence of gravity. This process includes rock falls, landslides, slumps, debris avalanches, and debris flows. Some of the many examples are:

- December 1967: Seven houses in 'Āina Haina and Niu Valley were slowly sliding downhill because of hillside erosion.
- New Years Day 1988: Slow moving Kona storms dumped 23 inches of rainfall and triggered more than 400 debris flows in the 'Āina Haina, Niu, Kuli'ou'u, and Hahaione valleys. The torrential rain also contributed to slow-moving landslides that caused catastrophic damage to stream channels, homes, and roads and took months to repair.
- November 1996: A mudslide in Makaha swept away several cars and bikes and left rocks and mud in the lobby of the Makaha Valley Towers condominium.
- March 2000: Rock and debris fell onto Kamehameha Highway at Waimea Bay. A new, \$4 million stretch of highway has been constructed 38 feet makai to mitigate future risk to motorists.
- March 2006: Heavy rains caused a dozen mass wasting events that backed up traffic and closed lanes during peak rush hour traffic on the Pali Highway.

Moreover, there are also many historic sites, including three heiau, contained within and around the proposed development. According to archeologists Patricia Price-Beggerly and J.R. McNeill, the "wholesale loss of cultural resources tends to accentuate the value of the few remaining sites in an area important to Hawaiian culture as reflected in its traditions and history. This makes it even more important that the cultural resources which are left be recovered or preserved."

For all the foregoing reasons, I oppose your application.

Sincerely,



Jeannine Johnson

- cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
✓ Helber Hastert & Fee, Planners  
Sen. Jill Tokuda  
Rep. Pono Chong  
Mayor Mufi Hannemann  
Councilmember Barbara Marshall  
Henry Eng, Director, Department of Planning and Permitting

October 8, 2008

Jeanine Johnson  
5648 Pia Street  
Honolulu, HI 96821

Dear Ms. Johnson:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1

Kāne'ōhe, O'ahu, Hawaii

Thank you for your letter dated June 9, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Although both of my parents are buried at Hawaiian Memorial Park, I strongly oppose Hawaiian Memorial Life Plan's application to reclassify approximately 56.6 acres of land at Kane'ōhe from the State Conservation Land Use District into the Urban Land Use District in order to develop a residential subdivision.  
Response: We note your opposition to the Proposed Action.
2. Your development project is outside the Koolaupoko Sustainable Communities Plan's Urban Growth Boundary and part of the Oneawa Hills area, which the Koolaupoko Sustainable Communities Plan states should be specifically excluded from the Urban Growth Boundary.

Response: As discussed in the EIS, the Petitioner understands that the Proposed Project is not in conformance with the existing Ko'olau Poko Sustainable Communities Plan (SCP), and the project will require an amendment to the Ko'olau Poko SCP. Section 3.2.2 of the EIS, Ko'olau Poko SCP, explains the conformance with the SCP and potential options for this amendment.

3. Conservation District lands are valuable for their ecological services. It is therefore vital to the future generations of residents of the City and County of Honolulu that we protect our Conservation land to preserve water quality and our water supply.

Response: The Final EIS discloses and examines impacts of the proposed project, and analyzes relevant policies and plans to determine project conformance. Section 3.1.3 of the EIS includes an analysis of the proposed project and the State's Land Use Law, especially related to reclassification to the Urban District. Uses for land must change over time to accommodate community services.

There will be a greatly reduced need for potable water for the project, as Hawaiian Memorial Park (HMP) has decided to modify the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension intended to service those lots. The need for irrigation water still exists, and options for irrigation water are discussed in the Draft EIS in Section 6.2.2. Our primary option is to develop on-site wells above groundwater that is not used for domestic supply.

Impacts to groundwater resources are not anticipated. Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulates special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters.

The retention areas will be designed to help to improve the water quality of Kāwā Stream and ultimately Kāne'ōhe Bay (see Section 6.4 of the EIS for a more detailed discussion). No one has a greater vested interest in the



proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

4. Your development project also causes significant safety concerns for the residents of your planned subdivision. The watersheds and slopes of Hawaii are the setting for a process geologists call mass wasting, where heavy clumps of rock and soil unhinge from a hill and slide, tumble, and ooze downwards under the unending influence of gravity. This process includes rock falls, landslides, slumps, debris avalanches, and debris flows.

Response: As noted above, the development program has been changed and there will no longer be a residential subdivision. For the proposed cemetery areas, as discussed in Section 4.6 of the EIS, a rockfall hazards and slope stability analysis was performed of the Petition Area by Shinsato Engineering, Inc. The study included a site reconnaissance to observe and map points of interest as they relate to soil and geologic conditions; collected near surface soil samples; reviewed soil and geologic information of the area; and analyzed the data to determine the stability of the existing slope, and the impact that the Proposed Action may have on the overall stability of the Petition Area as well as potential hazards from rockfalls.

The slope stability analysis determined that there is no apparent potential for hazards to the Petition Area that may be associated with slope stability. The factor of safety for the existing slopes and newly graded slopes exceeds 1.5 (the generally accepted minimum factor of safety). Therefore no mitigative measures are deemed necessary to protect the area from slope stability issues. Based on the results of the rockfall hazard analysis, there are four areas with the potential for hazard due to rockfall, located along the east and northeast edges of the Petition Area (See Figure 19 of the EIS).

Mitigative measures for rockfall hazards may include one or a combination of the following: 1) securing existing boulders using netting or chaining; 2) removal of the boulders; 3) installation of fencing uphill from proposed improvements; and 4) constructing a buffer zone between the rockfall hazard source and the proposed improvement. The choice of mitigative measure will depend on the specific site conditions.

5. There are also many historic sites, including three heiau, contained within and around the proposed development. According to archeologists Patricia Price-Beggerly and J.R. McNeill, the "wholesale loss of cultural resources tends to accentuate the value of the few remaining sites in an area important to Hawaiian culture as reflected in its traditions and history. This makes it even more important that the cultural resources which are left be recovered or preserved."

Response: We are not aware of three Heiau within or near the Petition Area. At this time, Kawa'ewa'e Heiau is the only known heiau in the area. We believe Sites 6930 and 6931 are ceremonial but have no definitive evidence they were heiau. As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, HMP will also modify the development program by establishing a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

6. I oppose your application.

Response: We note your opposition to the Proposed Action.



Ms. Jeannine Johnson  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 5

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Senator Jill Tokuda  
Representative Pono Chong  
Mayor Mufi Hannemann  
Councilmember Barbara Marshall  
Henry Eng, Department of Planning and Permitting

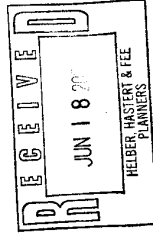
DEPARTMENT OF PARKS AND RECREATION  
**CITY AND COUNTY OF HONOLULU**  
KAPOLEI HALE • 1000 ULUOHA STREET, SUITE 309 • KAPOLEI, HAWAII 96707  
TELEPHONE: (808) 768-3003 • FAX: (808) 768-7053 • INTERNET: www.honolulu.gov



MUFI HANNEMANN  
MAYOR

LESTER K.C. CHANG  
DIRECTOR  
GAIL Y. HARAGUCHI  
DEPUTY DIRECTOR

June 13, 2008



Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion

Thank you for the opportunity to review and comment on the Draft Environmental Assessment for Hawaiian Memorial Park Cemetery Expansion.

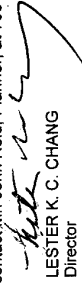
The Department of Parks and Recreation requested in our EIS Preparation Notice comments in January, 2008, that the Draft EIS include a description as to how the Park Dedication Ordinance requirements for the proposed 20 residential units would be met.

The Draft EIS includes a calculation of the dedication requirements pursuant to the ordinance, but it doesn't include a description as to whether that requirement will be met with dedication of park land or payment of a fee equal to the value of land which would otherwise have to be provided.

The Department of Parks and Recreation recommends that Hawaiian Memorial Life Plan, Ltd. meet the Park Dedication Ordinance requirements for the 20 single family residential units by paying the City the fee instead of dedicating 7,000 s.f. of off-site park land.

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

LKCC:jr  
(268231)



LESTER K. C. CHANG  
Director

cc: Mr. Orlando "Dan" Davidson, Land Use Commission, State of Hawaii  
Scott Ezer, Helber Hastert & Fee, Planners  
Mr. Robert Sumitomo, Department of Planning and Permitting  
Mr. Mario Siu-Li, Department of Planning and Permitting

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Lester K.C. Chang  
Department of Parks and Recreation  
City and County of Honolulu  
Kapolei Hale  
1000 Uluohia Sireet Suite 309  
Kapolei, HI 96707

Dear Mr. Chang:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i**

Thank you for your letter dated June 13, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The Department of Parks and Recreation requested that the Draft EIS include a description as to how the Park Dedication Ordinance requirements for the proposed 20 residential units would be met. The Draft EIS includes a calculation of the dedication requirements, but doesn't include a description as to whether the requirement will be met with dedication of park land or payment of fee equal to the value of the land which would otherwise be provided. Recommend meeting the requirement by paying the City the fee instead of dedication 7,000 s.f. of off-site park land.

Response: We acknowledge the requirement to meet the park dedication requirements for residential projects. We would like to notify you that the residential portion of the Proposed Action will not be built, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative and will become the Proposed Action. Therefore the project will no longer need to meet the park dedication requirements.

Mr. Lester K. C. Chang  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Robert Sumitomo, Department of Planning and Permitting  
Mr. Mario Siu-Li, Department of Planning and Permitting



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



MUFI HANNEMANN  
MAYOR

KENNETH G. SILVA  
FIRE CHIEF  
ALVIN K. TOMITA  
DEPUTY FIRE CHIEF

June 14, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
Oahu, Ko'olaupoko District  
Tax Map Key: 4-5-033: 001, Portion 001

In response to a letter from Mr. Scott Ezer of Helber Hastert & Fee Planners, Inc. dated June 6, 2008, regarding the above-mentioned subject, the Honolulu Fire Department reviewed the material provided and has no additional comments. Please refer to our correspondence dated February 1, 2008.

Should you have any questions, please call Battalion Chief Socrates Bratakos of our Fire Prevention Bureau at 723-7151.

Sincerely,

KENNETH G. SILVA  
Fire Chief

KGS/SK:bh

cc: Orlando Davidson, State Land Use Commission  
Rachael Edinger, Helber Hastert & Fee Planners, Inc. ✓

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Kenneth G. Silva  
Fire Chief  
City and County of Honolulu  
Honolulu Fire Department  
636 South Street  
Honolulu, HI 96813-5007

Dear Chief Silva:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i**

Thank you for your letter dated July 14, 2008 regarding the Draft Environmental Impact Statement (EIS) for the above-referenced project. We note that you have no additional comments other than what you provided in your February 1, 2008 correspondence.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control



**DEPARTMENT OF BUSINESS,  
ECONOMIC DEVELOPMENT & TOURISM**

STRATEGIC INDUSTRIES DIVISION  
235 South Beretania Street, Leleopapa A Kaimanama Bldg., 5<sup>th</sup> Floor, Honolulu, Hawaii 96813  
Mailing Address: P.O. Box 2399, Honolulu, Hawaii 96804

LINDA LINGLE  
GOVERNOR  
LESLIE  
DIRECTOR  
MARK K. ANDERSON  
DEPUTY DIRECTOR

Telephone: (808) 597-3807  
Fax: (808) 596-2536  
Web site: www.hawaii.gov/dbedt

**FILE COPY**

Hawaiian Memorial Life Plan, Ltd.  
June 17, 2008  
Page 2

**2. Energy and resource efficiency and renewable energy and resource development.**  
We do not note any proposed covenants to enhance the sustainability of the development, including green architecture, solar water heating and photovoltaic energy for appliances, shading of exterior lighting, and water conservation measures.

June 17, 2008

Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Attn: Jay Morford

Re: Draft Environmental Impact Statement  
Project Title: Hawaiian Memorial Park Cemetery Expansion  
Location: Oahu, Koolau Poko District  
Tax Map Key: Primary Project Area: 7-3-007-038; 7-3-007-039; 7-3-009: 007

Thank you for the opportunity to provide comments on the DEIS for the Hawaiian Memorial Park Cemetery Expansion, which is for cemetery and residential purposes.

We would like to call your attention to: (1) State energy conservation goals; and, (2) energy and resource efficiency and renewable energy and resource development.

**1. State energy conservation goals.** Project buildings, activities, and site grounds should be designed and/or retrofit with energy saving considerations. The mandate for such consideration is found in Chapter 344, HRS ("State Environmental Policy") and Chapter 226 ("Hawaii State Planning Act"). In particular, we would like to call to your attention HRS 226 18(c) (4) which includes a State objective of promoting all cost-effective energy conservation through adoption of energy-efficient practices and technologies.

There are opportunities for improved energy efficiency at the residential level which would range from ventilation design, landscaping, and the installation of energy saving devices including reduced consumption light fixtures.

Our website (<http://www.hawaii.gov/dbedt/info/energy/efficiency/>) provides detailed information on guidelines, directives and statutes, as well as studies and reports on aspects of energy efficiency. Please also do not hesitate to contact Carilyn Shon, Energy Efficiency Branch Manager, at telephone number 587-3810, for additional information on energy efficiency and renewable energy resources.

Sincerely,

  
Elizabeth Corbin  
Acting Administrator

c: OEQC  
Orlando "Dan" Davidson, State Land Use Commission  
Rachael Edinger, Helbert Hastert & Fee

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Elizabeth Corbin  
Acting Administrator  
Strategic Industries Division  
Department of Business, Economic  
Development & Tourism  
PO Box 2359  
Honolulu, HI 96804

Dear Ms. Corbin:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i**

Thank you for your letter dated June 17, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. State energy conservation goals: Chapter 344, HRS and Chapter 226 mandate consideration of energy conservation in all projects, including ventilation design, landscaping, and installation of energy saving devices including reduced consumption light fixtures.

Response: The proposed project will include revegetation with appropriate adaptive native and indigenous species. Some adaptive Polynesian-introduced plants may be used as well, all of which will require little or no watering once established. It should be noted that in a typical year, very little supplemental irrigation is required for the cemetery landscape areas, especially after plant material and turf has been established. For the watering that will be needed, the cemetery's irrigation system will employ weather-based "smart" evapotranspiration controllers.

The turf grass clippings are mulched in place, and in addition, Hawaiian Memorial Park (HMP) commits to starting a compost program to recycle all their green waste. The project will incorporate exfiltration systems under the roadways to maximize infiltration under the pavement. Use of energy efficient lighting will be employed whenever possible, but the

Ms. Elizabeth Corbin  
Hawaiian Memorial Park Cemetery Expansion Project  
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October 8, 2008  
Page 2



project is not expected to require much lighting, either indoor or outdoor. The mausoleums will be outdoor structures, and the proposed restroom will have a skylight so that no electrical lighting is required. Since the cemetery closes at dusk, the only lighting necessary will be for limited security lighting. If utilized, the lighting will be shielded to control light spill, and will use energy efficient light bulbs.

2. Energy and resource efficiency and renewable energy and resource development: do not note any proposed covenants to enhance the sustainability of the development, including green architecture, solar water heating, and photovoltaic energy for appliances, shading of exterior lighting, and water conservation measures.

Response: HMP has decided to modify the development program by eliminating the 20-lot residential subdivision and adopting Alternative III, "Cemetery Only" as the preferred alternative. Consequently, there will not be any residential lots developed. As discussed in Section 6.2 of the EIS, the use of non-potable water will be explored for cemetery irrigation. In addition, project operation and maintenance protocols already involve mulching of green waste. Water conservation measures will be explored, where possible, such as the use of waterless urinals and other water reduction techniques. Please also refer to Question #1 above for other resource-efficient techniques to be employed.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Darryl Barilla & Malia Van Heukelem  
45-244 Kenela Street  
Kaneohe, HI 96744



Dear Mr. Barilla and Ms. Van Heukelem:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated June 20, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We are opposed to expansion of Hawaiian Memorial Park and adding more homes in the Pikoioa neighborhood. We purchased our first home in Kaneohe six years ago because of the lush landscape, open space, and quiet area. We are avid hikers and gardeners with an appreciation for native plants. There are beautiful native pala'a ferns and ohia lehua in bloom just above the heiau.

Response: We note your opposition to the Proposed Action. We would like you to know that the residential portion of the Proposed Action will not be built, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative. The development program without the 20-lot residential subdivision will be the plan submitted to the Land Use Commission for consideration.

Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous,

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Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Darryl Barilla & Malia Van Heukelem  
45-244 Kenela Street, Kaneohe, HI 96744

June 20, 2008

Mr. Jay Morford, General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

We are opposed to expansion of Hawaiian Memorial Park and adding more homes in the Pikoioa neighborhood. We purchased our first home in Kaneohe six years ago because of the lush landscape, open space, and quiet area. We are avid hikers and gardeners with an appreciation for native plants. There are beautiful native pala'a ferns and ohia lehua in bloom just above the heiau. We have the following concerns:

- Construction in and around the heiau complex would desecrate this registered National Historic Site and destroy its cultural and historic value forever;
- rezoning would remove land from conservation – resulting in less land to support the water supply, deforestation, possible loss of habitat for native bats and birds;
- grading the hillside would increase problems with flooding in the Kawa stream which our property abuts;
- large scale construction would increase traffic, noise, and dust;
- expansion of the cemetery would increase property crime;
- the artistic rendering shows a vast part of the mountainside that will be developed and visible from all over Kaneohe ruining views and decreasing property values;
- If your company is not building the homes, then what are the parameters for new construction?
- The environmental impact statement claims the construction may last 10-20 years, if this is a short period of time, what do you consider a long term construction project?
- What measures will be taken to prevent mosquitoes from breeding in the drainage ponds?

Conservation land must be held in public trust to sustain the quality of life for current and future generations. Landowners must not be allowed to take these lands away to the detriment of the community.

Sincerely,

Darryl Barilla

Malia Van Heukelem

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert & Fee, Planners

and two are endemic. The Botanical Survey and Section 4.7 of the EIS, Flora, describes the area as having *pala'a*. Additionally, a concerted effort was made during the Botanical Survey to find any *'ohi'a lehua* within the Petition Area; none was located. It is possible that the *'ohi'a lehua* you have seen is not located within the Petition Area, especially if you have seen it near the Kawa'ewa'e Heiau, which is outside the Petition Area.

2. Construction in and around the heiau complex would desecrate this registered National Historic Site and destroy its cultural and historic value forever.

Response: The statements about these sites being part of a whole complex are well taken. These sites are indeed a component of the present landscape, but whether they were in use at the same time in an integrated community is yet to be determined and would require extensive further study in addition to that included in the scope for the inventory survey.

As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, the concept plan for the project has been revised to establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This cultural preserve will also include significant areas where the *laua'e fern* is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

Additionally, subsequent to land use approvals, the Petitioner is required to prepare an Archaeological Preservation Plan. All of the issues related to access and the preserve area will be dealt with in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division.

3. Rezoning would remove land from conservation — resulting in less land to support the water supply, deforestation, possible loss of habitat for native bats and birds.

Response: Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to

the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second-growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kolea*, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu *'Amakihi* and *Pueo*. The native Hawaiian Hoary Bat was not detected during the survey, which was not unexpected given the low numbers of bats reported to occur on O'ahu.

4. Grading the hillside would increase problems with flooding in the Kawa stream which our property abuts.

Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels.

The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Retention areas are included in the project Concept Plan as the preferred method to control storm water runoff. The retention areas will hold storm

water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

5. Large scale construction would increase traffic, noise, and dust.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. There are expected to be no impacts from traffic through your immediate neighborhood, as the Petitioner has concluded through the EIS analysis to eliminate the 20-lot residential subdivision from the development program, which includes elimination of the Lipalu Street extension.

Impacts from dust will be minimized by using several Best Management Practices such as watering, mulching, and temporary vegetation.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and summarized below. Their findings indicate that temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible

sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kanehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

6. Expansion of the cemetery would increase property crime.

Response: We do not believe that the project will increase crime. According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

7. The artistic rendering shows a vast part of the mountainside that will be developed and visible from all over Kaneohe ruining views and decreasing property values.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10, Scenic and Visual Resources of the EIS and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of the "Cemetery Only Alternative" which, as described in #1 above, is now the Proposed Action. For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.



The project is not expected to affect property values in the surrounding neighborhood, primarily because the cemetery will not be visible in the surrounding neighborhood. Cemeteries are excellent neighbors due to the hours of operation and the beautiful quiet setting and nature of the use. Many very high value residential neighborhoods are located adjacent to cemeteries throughout the country, and on O'ahu. There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community and people have accepted them as neighbors. This is also the case for HMP. In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. On average, property values and home sale prices are not any lower for the Parkview neighborhood than for the Pikoiloa neighborhood. Additionally, some studies that examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price.

8. If your company is not building the homes, then what are the parameters for new construction?

Response: As described above, the residential portion of the project has been eliminated from the development program.

9. The environmental impact statement claims the construction may last 10-20 years, if this is a short period of time, what do you consider a long term construction project?

Response: The project is broken into three phases; construction for each phase is only expected to last approximately six months, approximately ±5 years apart.

10. What measures will be taken to prevent mosquitoes from breeding in the drainage ponds?

Response: Retention areas are the preferred method to control storm water runoff. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down-stream receiving waters, and includes a wide variety of individual design techniques that can be used in appropriate circumstances. The retention areas are not permanent ponds or dams of water, and are approved by the County DPP. Property designed and maintained retention areas are not suitable habitat for mosquitoes.

Exact design criteria for the retention areas and appropriate substrate treatment will be determined after percolation tests are done on the soils. Proper design for retention areas ensures that water does not remain longer than three days; mosquitoes cannot complete a breeding cycle in this short of a time period. The project will include a Drainage Maintenance Plan that spells out the monitoring and maintenance protocol for the retention areas. Overall, the maintenance measures undertaken to meet water quality goals will also act to ensure these retention areas do not become mosquito breeding habitats.

11. Conservation land must be held in public trust to sustain the quality of life for current and future generations. Landowners must not be allowed to take these lands away to the detriment of the community.

Response: Uses for land must change over time to accommodate community services. This is just such a case.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

**BOARD OF WATER SUPPLY**

CITY AND COUNTY OF HONOLULU  
630 SOUTH BERETANIA STREET  
HONOLULU, HI 96843



June 20, 2008

MUFI HANNEMANN, Mayor  
RANDALL Y. S. CHUNG, Chairman  
SAMUEL T. HATA  
NANCY M. KANE  
ROBERT K. CUNIFF  
MARK C. TILKER  
CRAIG I. NISHIMURA, Executive  
BRENNON T. MORIOKA, Executive  
CLIFFORD P. LUM  
Manager and Chief Engineer  
DEAN A. NAKANO  
Deputy Manager and Chief Engineer

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: The Draft Environmental Impact Statement for Hawaiian Memorial Park Cemetery Expansion, TMK: 4-5-33:1

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

The comments in our letter of February 19, 2008, which are included in the Draft Environmental Assessment, are still applicable.

If you have any questions, please contact Robert Chun at 748-5443.

Very truly yours,

KEITH S. SHIDA  
Program Administrator  
Customer Care Division

cc: Mr. Orlando Davidson, Land Use Commission  
Ms. Rachael Edinger, Helber, Hastert & Fee, Planners  
Office of Environmental Quality Control

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Keith S. Shida  
Program Administrator  
Customer Care Division  
City and County of Honolulu  
Board of Water Supply  
630 South Beretania Street  
Honolulu, HI 96843

Dear Mr. Shida:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i**

Thank you for your letter dated June 20, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The comments in our letter of February 19, 2008 are still applicable.

Response: We addressed your February 19, 2008 letter comments in our May 23, 2008 response to comment letter. In addition, Section 6.2 of the EIS discusses water in detail and should adequately address the comments of your letter. We would like to point out that there will no longer be a need for potable water for the formerly proposed 20-lot residential subdivision, as the Petitioner has modified the project development program by eliminating those residential lots.



Mr. Keith Shida  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando Davidson, Land Use Commission  
Office of Environmental Quality Control

Jeannine Johnson, Legislative Sub-Committee Chair  
**Kuli'ou'ou / Kalani Iki Neighborhood Board #2**  
5648 Pia Street, Honolulu, Hawaii 96821  
Phone: 373-2874 (h) / 523-5030 (w)  
June 23, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Re: **TMK:** 1-4-05-033:portion of 001

**Applicant:** Hawaiian Memorial Life Plan, Ltd.

Dear Mr. Morford:

I am Committee Chair of the Kuli'ou'ou / Kalani Iki Neighborhood Board #2 Legislative Sub-Committee. Neighborhood Board #2 represents over 6,000 households, with a population of almost 20,000 people (State of Hawaii Data Book 2002) in East Honolulu.

Because the Aina Haina, Niu, and Kuli'ou'ou valleys have a long history of flooding, rockslides, boulders, and slope instability, at its December 7, 2006, meeting, Neighborhood Board #2, voted 12 to 1 to support the Director of the Department of Planning and Permitting (DPP) imposing appropriate standards for lands with an average grade of 20 percent or more especially those that pose a safety risk for residential neighborhoods located below such areas where development is proposed.

According to the DPP, most of your Project site slopes more than 20% requiring you to change the grade of the entire site and remove 73% of the forest that blankets the site. In addition, according to your draft Environmental Impact Statement, page 4-5, the existing soils are classified as having moderate to severe erosion. Based on your own rockfall hazard analysis (page 4-16 of the EIS), at least eight homes in your planned subdivision are located in an area with the potential for hazard due to rockfall.

For the foregoing reasons, I believe Neighborhood Board #2 would oppose your Project.

Sincerely,



Legislative Sub-Committee Chair  
**Kuli'ou'ou / Kalani Iki Neighborhood Board #2**

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
✓ Helber Hastert & Fee, Planners  
cc via email: Chair Robert Chuck  
Sen. Sam Slom  
Rep. Lyla Berg  
Rep. Barbara Marumoto

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Jeanmine Johnson  
Kuli'ou'ou/Kalani Iki Neighborhood Board #2  
5648 Pia Street  
Honolulu, HI 96821

Dear Ms. Johnson:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i**

Thank you for your letter dated June 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. According to the DPP, most of your Project site slopes more than 20% requiring you to change the grade of the entire site and remove 73% of the forest that blankets the site. In addition, according to your draft Environmental Impact Statement, page 4-5, the existing soils are classified as having moderate to severe erosion. Based on your own rockfall hazard analysis (page 4-16 of the EIS), at least eight homes in your planned subdivision are located in an area with the potential for hazard due to rockfall.

Response: As discussed in Section 4.6.2, of the Draft EIS, mitigative measures for rockfall hazards may include one or a combination of the following: 1) securing existing boulders using netting or chaining; 2) removal of the boulders; 3) installation of fencing uphill from proposed improvements; and 4) constructing a buffer zone between the rockfall hazard source and the proposed improvement. The choice of mitigative measure will depend on the specific site conditions. We would also like to inform you that Hawaiian Memorial Park has decided to modify the development program for the project and will eliminate the 20-lot residential subdivision.

Ms. Jeanmine Johnson  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

2. I believe Neighborhood Board #2 would oppose your Project.

Response: We note your belief that the Neighborhood Board #2 might oppose the project, but we also note that this is not an official letter from the Neighborhood Board itself.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Chair Robert Chuck  
Senator Sam Slom  
Representative Lyla Berg  
Representative Barbara Marumoto



DEPARTMENT OF TRANSPORTATION SERVICES  
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 766-8305 • Fax: (808) 524-4730 • Internet: www.honolulu.gov



MUJI HANNEMANN  
MAYOR

WAYNE YOSHIOKA  
DIRECTOR

RICHARD F. TORRES  
DEPUTY DIRECTOR

TP6/08-265209R

June 30, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:


Subject: Hawaiian Memorial Park Cemetery Expansion: Draft Environmental Impact Statement (DEIS)

This responds to your DEIS document that requested our review and comments on the Hawaiian Memorial Park Cemetery Expansion project.

Traffic impacts related to the expansion of the cemetery should be coordinated with the State of Hawaii Department of Transportation since access to the cemetery portion of the expansion would be from Kamehameha Highway, which is a State controlled roadway.

We are concerned with the possible traffic impacts to Lipalu Street. We request that residents on Lipalu Street as well as the surrounding neighborhood be consulted prior to the preparation of the final EIS. This consultation should include a formal notification to residents in the surrounding neighborhood of Lipalu Street and meeting(s) with the appropriate neighborhood board.

The department also requests that we be informed of the results of the consultation and comments by residents of the surrounding neighborhood prior to the preparation of the final EIS.

Very truly yours,  
  
WAYNE Y. YOSHIOKA  
Director

cc: Land Use Commission, State of Hawaii  
Helber Hastert & Fee, Planners  
Office of Environmental Quality Control (OEQC)

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Wayne Y. Yoshioka  
Department of Transportation Services  
City and County of Honolulu  
650 South King St. 3<sup>rd</sup> floor  
Honolulu, HI 96813

Dear Mr. Yoshioka:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii'**

Thank you for your letter dated June 30, 2008 (TP6/08-265209R) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Traffic impacts related to the expansion of the cemetery should be coordinated with the State Department of Transportation.

Response: The State Department of Transportation (DOT) is included as a consulted party and has received copies of the Draft EIS for review. We are coordinating with State DOT on any traffic impacts related to the project.

2. We are concerned about possible traffic impacts to Lipalu Street. We request that residents on Lipalu Street as well as the surrounding neighborhood be consulted prior to the preparation of the Final EIS.

Response: At this time we want to inform you that the Petitioner has modified the project development program, and will eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to services those lots. Consequently, there are expected to be no impacts from traffic on Lipalu Street.

3. We also request that we be informed of the results of the consultation and comments by residents of the surrounding neighborhood prior to the preparation of the Final EIS.

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Mr. Wayne Y. Yoshioka  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

Response: As disclosed in the EIS in Section 11.2, during the community outreach, community members raised questions on a variety of subject areas, including: viewplanes; flooding; traffic impacts; security; potable water sources; historic and cultural resources; and project alternatives.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control

LINDA LINGLE  
GOVERNOR



ROBERT G. F. LEE  
ADJUTANT GENERAL  
GARY M. ISHIKAWA  
DEPUTY ADJUTANT GENERAL

STATE OF HAWAII  
DEPARTMENT OF DEFENSE  
OFFICE OF THE ADJUTANT GENERAL  
3949 DIAMOND HEAD ROAD  
HONOLULU, HAWAII 96816-4486

July 1, 2008

Mr. Scott Ezer  
Helber, Hastert & Fee, Planner  
1330 Maunakea Street, Suite 2590  
Honolulu, Hawaii 96813

Subject: Hawaii Memorial Park Cemetery Expansion  
Draft Environmental Impact Statement  
TMK(s): 4-5-033 (portion); 56.6 acres

WE ARE SENDING YOU:

Item	Copies	Description
1	1	Jointed review responses on the Draft Environmental Impact Statement, Hawaii Memorial Park Cemetery Expansion

Attached herewith for your use and file is the jointed responses by the Engineering Office (HIENG) and Office of Veterans Services (OVS) of the Department of the Defense (DOD) on your Draft Environmental Impact Statement for the Hawaii Memorial Park Cemetery (HMPC) Expansion project.

The OVS and HIENG have some concerns on the HMPC Expansion project:

1. **Proposed roadway exit thru Ocean View Garden** - the security is a potential problem even with a gate that closes the cemetery at dusk. We are hoping that HMPC will start looking into the problem.
2. **Kawa Stream Pollutant Reduction** - This seems to be a statewide and City and County of Honolulu issue. The graveyard has been identified as one of contributor or pollutant. The retention basins proposed by the HMPC in this expansion can help only locally, and need to be maintained.
3. **Flooding and Runoff** - If this was an issue already, with this expansion, the engineers will need to assert extra effort to avert this situation. Cutting down trees may contribute to soil erosion and additional runoff.

RO060111

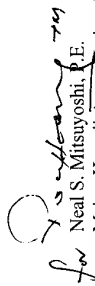
Mr. Scott Ezer  
Page 2  
July 1, 2008

4. **Alternates** - More in depth study of these alternates may be needed, and the opinions of local residents should be kept in mind.
5. **Application for re-zoning** - Impact to the eco-system should be addressed fully due to local residents not being able to appreciate the scenery changes that will occur in the near future.

The OYS and HIENG look forward to receiving your responses on the issues raised. Please forward all design and construction documents to our office.

Should you have any questions, please contact Mr. Rodney Huang, Civil Engineer, at 733-8440.

Sincerely,

  
Neal S. Mitsuyoshi, P.E.  
Major, Hawaii Army National Guard  
Chief Engineering Officer

c: OYS

Attachment

DEPARTMENT OF DEFENSE  
ENGINEERING OFFICE  
ENGINEERING SERVICE SECTION  
NOTE: Architect / Engineer shall return this form, noting action taken.

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

**Re:** Draft Report Review Comments

**Consultant:** Helber Hastert & Fee

<b>Reviewer's Name:</b>	Rodney Huang, P.E. and Mark Moses	<b>Date:</b>	7/03/08
<b>Organization:</b>	HIENG, and OYS, DOD, State of Hawaii		

Reference Page, Para., Item	Review Comment	Consultant Response: Action Taken (if none, state reason)
Page 1-5, 1-10 and Figure 4	On Socio-Economic Environment, and Unresolved Issues, we have a concern on Hawaii Memorial Park Cemetery (HMPC) proposing roadway exist thru Ocean View Garden since Hawaii State Veterans Cemetery (HSVC) does not have a guard at night, the security is a potential problem even though currently there is a gate which is being closed to the cemetery at dusk.	
Page 3-3	We also have a concern on potential increase of wastewater quantity - especially if there is a need to connect to the existing waste waterline outside the west boundary.	
P. 4-42/ Figure 22	There could be a distinct possibility that residents at the new residential complex take advantage of easiness to cross over the bushes and grass (50 ft of more of buffer) and driver/walk thru the cemetery and come into the existing Ocean View Garden and subsequently into the existing HSVC areas, which does not have a guard in the night based on the provided perspective in Figure 22.	
P. 5-5, Sec. 5.3	On the other note, the drainage patterns will be altered due to the extensive disturbance by this development. This issue should be addressed.	
P. 5-5, Sec. 5.3	We have a concern on the security issue especially in the evening after the new expansion is installed. We are hoping HMPC will start to look into it.	
P. 5.5.2 and P. 5.5.3	Who is the land owner of the site? Who is the Petitioner of this project?	
P. 6-10, Sec 6.2.2 and P.	According to the Petitioner, a water master plan will be prepared and submitted to Board of Water Supply for review and approval. Is this correct? Should it go through the State Public Utilities Commission for review and comment (Tel. 586-2020)?	

October 8, 2008

Major Neal S. Mitsuyoshi, P.E.  
State of Hawai'i  
Department of Defense  
Office of the Adjutant General  
3949 Diamond Head Rd.  
Honolulu, HI 96816-4495

Dear Major Neal S. Mitsuyoshi, P.E.:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 1, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

- Proposed roadway exit thru Ocean View Garden - the security is a potential problem even with a gate that closes the cemetery at dusk. We are hoping that HMPC will start looking into the problem.  
  
Response: Hawaiian Memorial Park (HMP) is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. Currently, HMP provides security until midnight.
- Kawa Stream Pollutant Reduction—This seems to be a statewide and County and County of Honolulu issue. The graveyard has been identified as one of contributor of pollutant. The retention basins proposed by the HMPC in this expansion can help only locally, and need to be maintained.

Response: Retention areas are included as the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally



superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus(TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. Because no additional runoff will enter Kāwā Stream, this equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne ōhe Bay. There will also be a management plan applied to the retention areas to ensure their long-term efficiency. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues.

3. Flooding and Runoff- If this was an issue already, with this expansion, the engineers will need to assert extra effort to avert this situation. Cutting down trees will contribute to soil erosion and additional runoff

Response: Please refer to the answer to Question #2 above for discussion of the retention areas. Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu Department of Planning and Permitting's Rules Relating to Storm Drainage Standards of January 2000. We should point out that HMP has modified its development program in two ways that will reduce impervious surfaces for the project: (1) eliminated the 20-lot residential subdivision and its associated roadway network; and (2) created a 9.4-acre cultural preserve that includes five archaeological sites and large areas of the laua fern which are gathered by hula practitioners. As a result, only 4.8 acres (8.5%) of the total 56.5-acre Petition Area will be comprised of impervious surfaces.

4. Alternates - More in depth study of these alternates may be needed, and the opinions of local residents should be kept in mind.

Response: The discussion of alternatives in the Final EIS has been expanded. We continue to listen to community concerns.

5. Application for re-zoning — Impact to the eco-system should be addressed fully due to local residents not being able to appreciate the scenery changes that will occur in the near future.

Response: Following Chapter 343, Hawai'i Revised Statutes, the EIS is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. All impacts to the ecosystem are disclosed as part of the analysis of the EIS.

6. We have a concern on Hawaii Memorial Park Cemetery (HMPC) proposing a roadway exit thru Ocean View Garden since Hawaii State Veterans Cemetery (HSVC) does not have a guard at night; the security is a potential problem even though currently there is a gate which is being closed to the cemetery at dusk.

There could be a distinct possibility that residents at the new residential complex take advantage of easiness to cross over the bushes and grass (50 ft of more of buffer) and drive/walk thru the cemetery and come into the existing Ocean View Garden and subsequently into the existing HSVC areas which does not have a guard in the night based on the provided perspective in Figure 22.

Response: Please see answer to Question #1. Perhaps HSVC should consider obtaining security services.

7. We also have a concern on potential increase of wastewater quantity — especially if there is a need to connect to the existing waste waterline outside the west boundary.

Response: A sewer connection has already been approved by the City and County of Honolulu Department of Planning and Permitting. However, as we indicated in #3 above, HMP has eliminated the 20-lot residential subdivision from the development program. Consequently there will be no wastewater demand from new housing.

8. On the other note, the drainage patterns will be altered due to the extensive disturbance by this development. This issue should be addressed.

Response: The topography and drainage patterns of the Petition Area are described in the EIS in Section 4.2.

Major Neal S. Mitsuyoshi, P.E.  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 4

9. We have a concern on the security issue especially in the evening after the new expansion is installed. We are hoping HMPC will start to look into it.

Response: Please see answer to Questions #1 and #6.

10. Who is the land owner of the site? Who is the Petitioner of this project?

Response: The landowner of the Petition Area and the petitioner is Hawaiian Memorial Life Plan, Ltd.

11. According to the Petitioner, a water master plan will be prepared and submitted to Board of Water Supply for review and approval. Is this correct? Should it go through the State Public Utilities Commission for review and comment?

Response: The Petitioner will need to coordinate with the City and County of Honolulu on the water use and development plan, and plan to work closely with them as the project moves forward. However, there will be no domestic system since the residential subdivision has been eliminated. The irrigation system will be private and will not need scrutiny by the Public Utilities Commission.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Office of Veteran Affairs

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) 523-4587  
Web Site: [www.honolulu.gov](http://www.honolulu.gov)



MUJI HANNEMANN  
MAYOR

EUGENE C. LEE, P.E.  
DIRECTOR  
RUSSELL H. TAKARA, P.E.  
DEPUTY DIRECTOR

July 1, 2008

Mr. Scott Ezer, Principal  
Helber, Hastert and Fee, Planners  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813

Dear Mr. Ezer:

Subject: Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK: 4-5-033:001 por. 001

Thank you for giving us the opportunity to comment on the above Draft Environmental Impact Statement (DEIS).

The Department of Design and Construction has the following comments:

- As stated in the DEIS, the proposed 20-lot subdivision is indeed required to meet the City and County of Honolulu park dedication requirements stipulated in the Subdivision Ordinance. We recommend that the applicant meet with officials from the Department of Parks and Recreation, Department of Design and Construction, and Department of Planning and Permitting to discuss the most appropriate means to meet the requirements in these circumstances. Fees may also be requested in lieu of dedication of park lands, if appropriate.

Should you have any questions, please call Clifford Lau, Chief of our Facilities Division, at 768-8483.

Very truly yours,



FOR Eugene C. Lee, P.E.  
Director

ECL:it (265:137)

c: DDC Facilities Division

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Eugene C. Lee, P.E.  
Director  
Department of Design and Construction  
City and County of Honolulu  
650 South King Street 11<sup>th</sup> floor  
Honolulu, HI 96813

Dear Mr. Lee:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 1, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. As stated in the Draft EIS, the proposed 20-lot subdivision is indeed required to meet the City and County of Honolulu park dedication requirements stipulated in the Subdivision Ordinance. We recommend meeting with Dept. of Parks and Recreation, Dept. of Design and Construction, and Dept. of Planning and Permitting to discuss the most appropriate means to meet the requirements. Fees may also be requested in lieu of dedication of park lands.

**Response:** We acknowledge the requirement to meet the park dedication requirements for residential projects. We would like to notify you that the residential portion of the Proposed Action will not be built, as the Petitioner has modified the project development program by deleting them. Therefore the project will no longer need to meet the park dedication requirements.

Mr. Eugene C. Lee  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Department of Design and Construction, Facilities Division



45-510 Puoni Place  
Kaneohe, HI 96744  
July 2, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

Subject: Proposed Expansion of Hawaiian Memorial Park

Today I received Representative Ken Ito's *Legislative Update*. Like other residents of Kaneohe, I am concerned over the proposed expansion of Hawaiian Memorial Park.

My family and I have lived in Kaneohe our entire lives. My parents, both sets of my grandparents, and many of my relatives are buried at Hawaiian Memorial Park and in the Veterans Cemetery. I am not anti-development, but I am totally opposed to re-designating conservation land to build a 20-lot residential subdivision.

Sincerely,

  
(Mrs.) Karen Galut

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
✓ Helber-Hastert & Fee, Planners  
Representative Ken Ito

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Karen Galut  
45-510 Puoni Place  
Kāne'ohe, HI 96744

Dear Ms. Galut:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 2, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Like other residents of Kāne'ohe, I am concerned over the proposed expansion of Hawaiian Memorial Park. My family and I have lived in Kāne'ohe our entire lives. My parents, both sets of my grandparents, and many of my relatives are buried at Hawaiian Memorial Park and in the Veterans Cemetery. I am not anti-development, but I am totally opposed to re-designating conservation land to build a 20-lot residential subdivision.

Response: We note your concern about and opposition to the Proposed Action. We would like you to know that Hawaiian Memorial Park has decided to modify the development program, and the residential portion of the Proposed Action will not be built.



We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Representative Ken Ito, 48<sup>th</sup> District



Mark Lutwak & Y York

46-063 Emepela Pl. #R209 Kane`ohe, Honolulu, HI 96744 ♦ 808.235.2545

3 July 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

We were distressed to learn that SCI/Memorial Park is applying for a zone change to further develop the mountainside behind Pohai Nani.

This is crucial conservation/preservation land, providing both scenic landscape and flood prevention for this part of Kane`ohe. It is also a key part of the Kawa Stream watershed; more development will increase toxic run-off into our threatened bay.

As residents and regular voters in Kane`ohe, we would like to see more respect for the our remaining land and restraints on over development.

Sincerely,

Mark Lutwak & Y York

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert & Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Mark Lutwak  
Y York  
46-063 Emepela PL #R209  
Kāne'ohē, HI 96744

Dear Mr. Lutwak and Y York:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohē, O'ahu, Hawai'i**

Thank you for your letter dated July 3, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. This is crucial conservation/preservation land, providing both scenic landscape and flood prevention for this part of Kāne'ohē. It is also a key part of the Kawa Stream watershed; more development will increase toxic runoff into our threatened bay.

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus(TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. Because no additional runoff will enter Kāwā Stream, this equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne'ohē Bay (see Section 6.4 of the EIS for a more detailed discussion). No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and water quality issues.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Mark Lutwak  
Y York  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2



2. As residents and regular voters in Kāne'ohē, we would like to see more respect for our remaining land and restraints on development.

Response: We note your desire to see restraints on development. It is the intent of the Petitioner to practice respect for the land in all development activities, by following all environmental laws and regulations as well as the proposed mitigation to offset any impacts that might occur as a result of the project.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control

Lovell F. Kaleikini  
 P.O. Box 950  
 Kaneohe, HI 96744  
 July 5, 2008

Mr. Jay Morford  
 General Manager  
 Hawaiian Memorial Life Plan, Ltd.  
 1330 Maunakea Street  
 Honolulu, HI 96813

Aloha Mr. Morford:

Are you related to Ford Motor Company? They build awesome "150 Ford Trucks". Ha! Ha! Ha!

I support "Hui O' Pikoilua" in protecting Kaneohe, my home, from Hawaiian Memorial expansion, Genocide, formaldehyde. Formaldehyde is an embalming colorless, odorless, gaseous compound fluid for preserving and disinfectant esters, dead bodies. I have been in my home since 1964 and I do not believe I have heard Hawaiian Memorial Park (HMP) mention the number of pounds of formaldehyde gas is leaking from underground. HCHO is the compound makeup of formaldehyde. Not only am I protesting as a home owner but as a landowner as well because I own the land under my home.

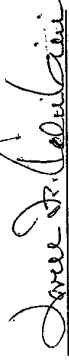
I also support "Hui O' Pikoilua" (1) ecosystem, 2) environment, and 3) Kawa'ewa's. First let me introduce you to the ecosystem, please meet all the homeowner owners of the "Pikoilua Subdivision". The important human fact that supersedes any form of intelligence is that as the ecosystem we inhale oxygen and exhale carbon dioxide. What "HMP" has failed to do in my opinion is the study of an individual organism within the ecosystem working unit and the individual needs to tolerate its way of life and functioning in the environment. I am suggesting the individual organism and its functioning throughout all stages of its life cycle within the ecosystem. How much land or working area should be considered for an individual organism requirement in an ecosystem to survive the laws and functioning government in the environment.

Like the ecosystem the environment as well inhales carbon dioxide and exhales oxygen which the ecosystem clearly needs. Clearly the ecosystem depends on the environment and the environment depends on the ecosystem. The destruction of the environment will destroy itself as well as the ecosystem. It will destroy nature as we know it to be as well as mankind. It will also destroy the wet land forest here in Kaneohe and we all know what happens when we don't have sufficient supply of water our animal husbandry and agriculture will suffer. Right now all us are suffering because the insufficient supply of water. Not mentioning ridiculous cost of gasoline

The Heiau "Kawa'ewa'e" should not be violated. It is sacred. My house is built on the path of Kawa'ewa'e that leads to H-3. My front door of my home faces directly in the direction of the heiau. Kawa'ewa'e was built 10 X the size than what it is today. Kawa'ewa'e has been violated to many times. Enough! Enough! You do not understand the risks, the devastation involved in the removal or any more disfigurement of the heiau. It could destroy all of us. It could destroy Po Hai Nani. It could destroy Hawaiian Memorial Park (HMP). That is funny destroy a cemetery. It could very well destroy us to, the ecosystem and environment. Lot of us here remember the devastation of hurricane "Iniki" and hurricane "Ewa". The Hawaiian Island of Kauai was destroyed. Till today most of the island has not been fully restored. What about Hurricane "Kathina"? What about China? What about Myanmar? What about Philippines? What about Iowa? Destroying the Heiau of Kawa'ewa'e will bring the strong winds from the East and the ocean and it will be total destruction of all our homes as we know it to be in the Pikoilua Subdivision Kaneohe. The dedication of every heiau a human life was taken. When you destroy that heiau you

also destroy that peace and harmony between that human bones, iwi, the 'aina and Akua, God.  
 May God have mercy upon your souls.

Mahalo Nui Loa Kakaou

  
 Lovell F. Kaleikini

October 8, 2008

Lovell F. Kaleikini  
P.O. Box 950  
Kaneohe, HI 96744

Dear Mr. Kaleikini:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 5, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I support "Hui O' Piko'loa" in protecting Kaneohe, my home, from Hawaiian Memorial expansion, Genocide, formaldehyde. Formaldehyde is an embalming colorless, gaseous compound fluid for preserving and disinfecting cadavers, dead bodies. I have been in my home since 1964 and I do not believe I have heard Hawaiian Memorial Park (HMP) mention the number of pounds of formaldehyde gas is leaking from underground. HCHO is the compound makeup of formaldehyde. Not only am I protesting as a home owner but as a landowner as well because I own the land under my home.

Response: Formaldehyde is one of the most common chemicals used in America for an incredible number of products and materials such as furniture manufacture. Its use in modern embalming methods is in very small diluted quantities. It is a biodegradable organic compound which decomposes when exposed. It is important to remember that every non-cremated interment is placed in a casket and a concrete outer burial container with a sealed top or lid to allow a stable environment burial both for compaction of the soil around the grave and for exposure to the elements.

2. I also support "Hui O' Piko'loa" 1) ecosystem, 2) environment, and 3) Kawa'ewa'e. The important human fact that supersedes any form of intelligence is that as the ecosystem we inhale oxygen and exhale carbon dioxide. HMP has failed to do a study of an individual organism within the ecosystem working unit and the individual needs to tolerate its way of life and functioning in the environment. I am suggesting the individual organism and its functioning throughout all stages of its life cycle within the ecosystem.

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Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

How much land or working area should be considered for an individual organism requirement in an ecosystem to survive the laws and functioning of government in the environment.

Like the ecosystem, the environment as well inhales carbon dioxide and exhales oxygen which the ecosystem clearly needs. Clearly the ecosystem depends on the environment and the environment depends on the ecosystem. The destruction of the environment will destroy the ecosystem and nature as we know it to be as well as mankind. It will also destroy the wet land forest here in Kaneohe and we all know what happens when we don't have sufficient supply of water our animal husbandry and agriculture will suffer. Right now all us are suffering because the insufficient supply of water. Not mentioning ridiculous cost of gasoline.

Response: We agree that Hawai'i's ecosystem is valuable and needs to be protected. Nevertheless it is essential that we plan for the future, which includes an increased population with a significant increase in the percentage of our residents who will become elderly in the next 20 years. Part of this planning includes anticipation of the facilities and services necessary to support interment and inurement of family members in the future. The certitude of the need for these facilities cannot be ignored.

Following Chapter 343, Hawai'i Revised Statutes, an EIS is intended to disclose and provide information on all known or potential effects that a project may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. Several aspects of health and welfare of residents is included as part of the analysis of the EIS. The Petitioner will follow all mitigation measures to ensure there is no overall significant impact associated with the project.

3. The Heiau "Kawa'ewa'e" should not be violated. It is sacred. My house is built on the path of Kawa'ewa'e that leads to H-3. My front door of my home faces directly in the direction of the heiau. Kawa'ewa'e was built 10 times the size of what it is today. Kawa'ewa'e has been violated to many times. Enough! Enough! Enough! You do not understand the risks, the devastation involved in the removal or any more disfigurement of the heiau. It could destroy all of us. It could destroy Po Hai Maul. It could destroy Hawaiian Memorial Park (HMP). It could very well destroy us to, the ecosystem and environment. Lot of us here remember the devastation of hurricane "Iaui" and hurricane "Ewa". The Hawaiian Island of Kauai was destroyed. Till today most of the island has not been fully restored. What about Hurricane "Katrina"? What about China? What about Myanmar? What about Philippines? What about Iowa? Destroying the Heiau of Kawa'ewa'e will bring the strong winds from the East and the ocean and it will be total destruction of



all our homes as we know it to be in the Pikoloa Subdivision Kaneohe. The dedication of every heiau a human life was taken. When you destroy that heiau you also destroy that peace and harmony between that human bones, iwi the 'ama and Akin, God.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, HMP has modified the development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931, and will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites. This area will remain in its current "natural" state, except for a modest access road.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control

Dr. Judith Lemus  
45-214 Puuli Koa  
Kaneohe, HI 96744  
July 7, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

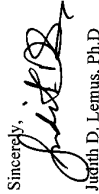
Dear Mr. Morford:

I am writing to express my deep concerns about the proposed expansion of the Hawaii Memorial Park into Conservation Land.

Conservation land is just that – it is to be conserved as open space for future generations of Hawaii. SCI and HMP presumably knew that the land they acquired was zoned as Conservation Land and this recent attempt to reclassify 56 acres from its original intention appears to be a "bait and switch" tactic. There also appears to be insufficient justification for the residential development other than as a revenue-generating endeavor for HMP. With houses languishing on the market for months, at this time there is no clear need for new housing developments in the area, especially at the expense of Conservation Land. Furthermore, the grading and deforestation of a mountainous watershed into turf grass is generally not a good idea even during a stable climate, but is particularly shortsighted as Hawaii faces an uncertain period of climate change that could bring more destructive storms to the islands. There is little guarantee that the retention system planned for the site will be sufficient, and could likely contribute to the spread of mosquitoes and possibly mosquito-borne diseases. The increased loading of pesticides, herbicides and fertilizers probably will also have a detrimental effect on the immediate watershed and ultimately on the marine resources (Kaneohe Bay cannot afford more environmental assaults), perhaps even on the ground water supply. Also troubling is the close proximity that this development will come to important cultural and historical sites, which will likely bring more traffic to these sites and contribute to their destruction. The transformation of a naturalized mountain vista into a road-cut grassy thoroughfare is yet another reason this project is unappealing.

In summary, the proposed expansion of HMP does not conform to the Hawaii State Plan, which "represents public consensus regarding expectations for Hawaii's future", nor the Koolau Poko Sustainable Communities Plan. I urge HMP to seriously reconsider its proposal for expansion and will actively encourage all of the appropriate entities and my representatives to reject this petition.

Sincerely,



Judith D. Lemus, Ph.D.

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helbert Hastert & Fee, Planners  
Representative Ken Ito, 48<sup>th</sup> District  
Honolulu City Council

P.S. I am also concerned about the loss of potential  
habitat for native Amakihi and Pueo birds.

October 8, 2008

Judith Lemus  
45-214 Puaili Koa  
Kaneohe, HI 96744

Dear Dr. Lemus:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 7, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am writing to express my deep concerns about the proposed expansion of the Hawaii Memorial Park into Conservation Land.

Response: We note your opposition to the Proposed Action.

2. Conservation land is just that — it is to be conserved as open space for future generations of Hawaii. SCI and HMP presumably knew that the land they acquired was zoned as Conservation Land and this recent attempt to reclassify 56 acres from its original intention appears to be a "bait and switch" [sic] tactic.

Response: The use of land is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. Uses for land must change over time to accommodate community needs.

3. There also appears to be insufficient justification for the residential development other than as a revenue-generating endeavor for HMP. With houses languishing on the market for months, at this time there is no clear need for new housing developments in the area, especially at the expense of Conservation Land.



Response: All landowners have the privilege of considering appropriate alternative uses for their property subject to the required land use approval process. It was appropriate for Hawaiian Memorial Park (HMP) to consider a consistent and modest extension of the existing residential land use surrounding its property. As you know, there are significant entitlement and development costs associated with this process. The opportunity to obtain a near term revenue source to help defray those costs is important to HMP. Nevertheless, the 20-lot residential subdivision has been eliminated from the development program by HMP, and the residential portion of the Proposed Action will not be built.

4. Furthermore, the grading and deforestation of a mountainous watershed into turf grass is generally not a good idea even during a stable climate, but is particularly shortsighted as Hawaii faces an uncertain period of climate change that could bring more destructive storms to the islands. There is little guarantee that the retention system planned for the site will be sufficient, and could likely contribute to the spread of mosquitoes and possibly mosquito-borne diseases.

Response: First, while the Petition Area is currently within the State Conservation District, it is not recognized as an area that contributes percolation for domestic water. Additionally, retention areas are the preferred method to control storm water runoff.

The City and County of Honolulu Department of Planning and Permitting (DPP) Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwa Watershed Total Maximum Daily Loads.

Retention areas are not permanent ponds or dams of water, and will be approved by the County DPP. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters, and includes a wide variety of individual design techniques that can be used in appropriate circumstances. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. Properly designed and maintained retention areas are not suitable habitat for mosquitoes.

Proper design for retention areas ensures that water does not remain longer than three days; mosquitoes cannot complete a breeding cycle in this short of a time period. The project will include a Drainage Maintenance Plan that spells out the monitoring and maintenance protocol for the retention areas. Overall, the maintenance measures undertaken to meet water quality goals will also act to ensure these retention areas do not become mosquito breeding habitats. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

5. The increased loading of pesticides, herbicides and fertilizers probably will also have a detrimental effect on the immediate watershed and ultimately on the marine resources (Kaneohe Bay cannot afford more environmental assaults), perhaps even on the ground water supply.

Response: HMP will work to ensure groundwater impacts are minimized. We would like to point out that HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides and herbicides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. It is probable that nearby residents contribute a much greater use of herbicides and pesticides than the cemetery. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

The turf areas are treated with slow release turf fertilizers twice a year; in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. Impacts on groundwater are expected to be minimal. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to UH's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application.

The proposed project is helping to improve the water quality of Kāwā Stream and ultimately Kaneohe Bay (see Section 6.4 of the EIS for a more detailed discussion). The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The retention system has been designed to capture all of the runoff generated by the daily rainfall

events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system.

6. Also troubling is the close proximity that this development will come to important cultural and historical sites, which will likely bring more traffic to these sites and contribute to their destruction.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. The development program for the project has been modified, and a cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'e'e Heiau has been included as part of the project. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be approximately 9.4 acres in size, and will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

7. The transformation of a naturalized mountain vista into a road-cut grassy thoroughfare is yet another reason this project is unappealing.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as

well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS, including a thorough review of the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

8. In summary, the proposed expansion of HMP does not conform to the Hawaii State Plan, which "represents public consensus regarding expectations for Hawaii's future", nor the Koolau Poko Sustainable Communities Plan. I urge HMP to seriously reconsider its proposal for expansion and will actively encourage all of the appropriate entities and my representatives to reject this petition.

Response: Section 3.1.1 of the EIS discusses and analyzes the impacts of the Proposed Action with respect to relevant Hawaii State Plan goals, objectives, policies, and priority guidelines. As discussed in the EIS, the Petitioner understands that the Proposed Project is not in conformance with the existing Koolau Poko Sustainable Communities Plan (SCP), and the project will require an amendment to the Koolau Poko SCP. While you have cited some language from the Hawaii State Plan which could be used as an argument against the project, there are many sections of the State Plan that support the project, and these are indicated in the EIS. Because of the very general nature of the language in the State Plan, this is not uncommon.

9. Also concerned about the loss of potential habitat for native Amakahi and Pueo birds.

Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area.

As noted in Section 4.8 of the EIS, the short-eared Owl or Pueo (*Asio flammeus sandwichensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible Pueo could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, and *Pueo*. There is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few Pueo that still exist on O'ahu would require.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Representative Ken Ito, 48<sup>th</sup> District  
Honolulu City Council

DEPARTMENT OF FACILITY MAINTENANCE  
**CITY AND COUNTY OF HONOLULU**  
1000 Ulukouia Street, Suite 215, Kapolei, Hawaii, 96707  
Phone: (808) 768-3243 • Fax: (808) 768-3381  
Website: www.honolulu.gov



MUFI HANNEMANN  
MAYOR

CRAIG I. NISHIMURA, P.E.  
DIRECTOR AND CHIEF ENGINEER  
GEORGE "KEN" MIYAMOTO  
DEPUTY DIRECTOR

IN REPLY REFER TO:  
DRM 08-579

July 11, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Draft Environmental Impact Statement (DEIS)  
Hawaiian Memorial Park Cemetery Expansion

Thank you for the opportunity to review and comment on the DEIS dated May 2008 for the proposed Hawaiian Memorial Cemetery Park Expansion project.

We have no comment to add to the document. It is our understanding that the project roadways, including the residential subdivision roadways, drainage system and storm water retention areas will be privately-owned and maintained and will not be dedicated to or maintained by the City.

Should you have any questions, please call Charles Pignataro of the Division of Road Maintenance, at 768-3697.

Sincerely,

  
Craig I. Nishimura, P.E.  
Director and Chief Engineer

c: Land Use Commission, State of Hawaii  
Helber Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Craig I. Nishimura, P.E.  
Director and Chief Engineer  
Department of Facility Maintenance  
1000 Ulukouia Street, Suite 215  
Kapolei, Hawaii 96707

Dear Mr. Nishimura:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 (DRM 08-579) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. We note that you have no comment to add to the document as the project roadways, drainage system and storm water retention areas will be privately-owned and maintained and will not be dedicated to or maintained by the City.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I have lived on Lipalu St. since  
1973. It is a great neighborhood.  
I am against any changes in this  
Street.*

*I do not want to see this  
area changed from its present  
Zoning Status of Conservative*

Sincerely,

Name: Stanley Wanelson

Address: 45-465 Lipalu St

City, State, Zip: HAWAII HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Stanley Wanelson  
45-465 Lipalu St.  
Kāne'ohe, HI 96744

Dear Mr. Wanelson:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am against any change to Lipalu Street and to the current conservation zoning.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners

*Scott Ezer*

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I'm concerned about increased noise, traffic, flooding, damage to flora & fauna + view planes resulting from the un-needed, invasive development. It will diminish the quality of life for Kaneohe residents so a big, international wealthy, powerful co. can get wealthier.*

*Hawaii is not like Texas & we value our environment which is so unique & fragile, Pollution, destruction of archeological sites will ruin this town if you are allowed to overturn our zoning,*

*Go away! Protect your oil wells instead of from our homes, serenity & lifestyle.*

Sincerely,



Name: Thomas Boaz

Address: 45-120 Moamahi Way

City, State, Zip KANE OHE HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Thomas Boaz  
45-120 Moamahi Way  
Kane'ohe, HI 96744

Dear Mr. Boaz:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kane'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I'm concerned about increased noise.

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final Environmental Impact Statement (EIS), and are summarized here. Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and



future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

2. Concerned about increased traffic.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project.

In regard to your immediate neighborhood, the Petitioner has decided to modify the Proposed Action by eliminating the 20-lot residential subdivision and the Lipalu Street extension from the development program. As a result, there are expected to be no impacts from traffic through your immediate neighborhood.

3. Concerned about flooding.

Response: As discussed in detail in Section 6.4 of the EIS, retention areas are proposed as the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

4. Concerned about damage to flora and fauna.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local

flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

In regard to Fauna, Section 4.8 of the EIS describes how the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kolea*, who forage in grassy areas with a good insect supply. The revegetation of 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Windward O'ahu.

5. Concerned about viewplanes.

Response: As described above, the Petitioner has decided to eliminate the proposed 20-lot subdivision from the development program and replace it with additional area for cemetery expansion. The Petition will also set aside 9.4 contiguous acres of the Petition Area for a cultural preserve to protect archaeological sites and communities of *laua'e* fern for gathering purposes. This area will remain intact and will not be developed except for a modest access road. A combination of these factors will combine to minimize visual impacts associated with the cemetery expansion.

Development of the Petition Area as a cemetery will not affect views of the Ko'olau Mountains or Kane'oh'e Bay. The appearance of the Petition Area will change, but the perception of this change will vary depending on where you are. In general, short-range views of the Petition Area will be moderated and obscured by the presence of existing and proposed vegetative buffers, and the difference in topography between the Petition Area and adjacent residential neighborhoods.



6. Concerned about destruction of archeological sites.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. To address concerns expressed about archaeological sites, HIMP has modified the development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that includes five archaeological sites and large areas of Iau'e fern that are used for gathering. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1350 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*My concern is the water. Only planning to retain additional runoff from new roads and lawns. Erosion and storm runoffs will add pollution to Kawa Stream and Kawahe Bay. I am afraid of the backlog of many houses, where the water will run into.*

*Makalo,*

Sincerely,

*Arlene B. Roderhurst*

Name: Arlene B. Roderhurst

Address: 45-418 Nakulua I 57

City, State, Zip Kaneohe, Hawaii 96744-2221

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Arlene B. Rodenhurst  
45-418 Nakululai St.  
Kāne ohe, HI 96744

Dear Ms. Rodenhurst:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne ohe, Oāhu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My concern is the water. Only planning to retain additional runoff from new roads and houses. I am afraid of the backyards of many homes where the water will run into.  
  
Response: First, we would like to let you know that Hawaiian Memorial Park (HMP) has decided to modify the project development program by eliminating the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. As discussed in detail in Section 6.4 of the Draft Environmental Impact Statement (EIS), retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

2. Erosion and storm runoff will add pollution to Kawa Stream and Kaneohe Bay.  
  
Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the



Ms. Arlene B. Rodenhurst  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned with the volume of traffic that will be flowing thru our community. I live on a very dangerous inter-section - Namoku & Mokuilele Streets. The stop sign on my corner is a blind section. On the left side there is a slight curve that blocks the view of on coming cars. I to the right is a curve until there a hill upon you. With this increase in volume I won't be able to get out of my driveway.*

Sincerely,

*Carol Liu*

Name: Carol Liu  
Address: 45-202 Namoku St.  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Carol Liu  
45-202 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Liu:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned with the volume of traffic that will be flowing through our community. I live on a very dangerous intersection, Namoku and Mokuilele Streets. With this increase in volume, I won't be able to get out of my driveway.

Response: We want to take this opportunity to inform you that Hawaiian Memorial Park has decided to modify the project development program and will eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

Your concerns about the current danger of your intersection and exiting from your driveway should be taken up with the City and County of Honolulu, Department of Transportation Services.



We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

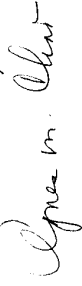
July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I live in Pihikona for 46 years.  
I would hate to see Hines and Mandelbaum  
on our beautiful Green Mountain. I  
look up there every day and see the  
Green forest. Makes me so happy that I  
live in beautiful Kaneohe. No Change Please.  
Love it the way it is

Sincerely,



Name: Agnes M. Char  
Address: 45-213 NAKULUAI PI.  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Agnes Char  
45-213 Nakulua Pl.  
Kāne'ōhe, HI 96744

Dear Ms. Char:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I would hate to see houses and mausoleum on our beautiful green mountain.

Response: As discussed in the Draft Environmental Impact Statement (EIS), Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10, Scenic and Visual Resources of the EIS and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Ms. Agnes Char  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.

2. No change please. Leave it the way it is.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My family and I moved to Kaneohe 10 years ago from Makakilo where the mountains and scenery are brown and dry. I am concerned that the draft EIS does not truly demonstrate the impact of the development to the beautiful Piloikoa area. I am also disappointed about the incomplete survey on archaeological sites (limited area surveyed) and the disregard of the recommendations made by the cultural survey. I recently learned of the underground streams below the Veteran's Cemetery and the experience of grave sites sinking. Have you considered in the EIS the impact of underground streams to the grave sites and run-off water? Please advise.

Sincerely, *Michaela Arume*

Name: Michaela Arume

Address: 45-409 Ohaha St.

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Michaela Arume  
45-409 Ohaha St.  
Kāne'ohe, HI 96744

Dear Ms. Arume:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned that Draft EIS does not truly demonstrate impact of the development to the area.  
Response: Following Chapter 343, Hawai'i Revised Statutes, an Environmental Impact Statement (EIS) is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment.
2. Disappointed that survey is incomplete and only a limited area was surveyed for archaeological sites.  
Response: We are not sure what in the Draft EIS led you to conclude the area surveyed for the Archaeological Inventory Survey was incomplete or that the survey itself is incomplete. The survey was of 66 acres (greater than the 56.5-acre Petition Area), and fieldwork consisted of a 100% coverage pedestrian inspection with systematic transects across the landscape with 16 to 33 foot-intervals between archaeologists. All historic properties encountered were recorded and documented with a written field description, site map, photographs, and located utilizing a Global Positioning System.
3. Disregard of recommendations by the cultural survey.  
Response: We are not sure what in the Draft EIS led you to believe we will be disregarding the recommendations of the Cultural Impact Assessment (CIA). Section 5.5.3 specifically states "The Petitioner will follow the

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

mitigation measures as recommended by the CIA to address potential adverse impacts of the Proposed Action on Hawaiian cultural beliefs, practices, and resources" (p. 5-9 of the Draft EIS). We would also like to inform you that Hawaiian Memorial Park (HMP) has modified the development program in by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of lau'au fern that can be used for gathering by hula practitioners and others.

4. I recently learned of the underground streams below the Veterans Cemetery and the experience of gravesites sinking. Have you considered in the EIS the impact of underground streams and runoff water?

Response: The ground-subside problems that have occurred at the Veteran's Cemetery have not occurred at HMP. Runoff and drainage are discussed in great detail in Section 6.4 of the EIS. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

We are very concerned about the traffic congestion which will occur if this drive layout proceeds. We are also concerned about pollution, safety of our community, and greatly impacting our quality of life.

Let's keep the country, country - PLEASE!!  
Too much development has already been permitted on Oahu!

We do not need a repeat of the flooding which has already occurred.  
It seems ridiculous to destroy vegetation only to replant trees later. We need the trees and the birds!

Sincerely,  
Also please respect the Hawaiian culture - no trees to move things around or bulldoze over.  
I thank you for reading our concerns.

Name: Richard & Estelle Hoag

Address: 45-108 Mikihika ST.

City, State, Zip: Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Richard and Estella Houg  
45-108 Mikihina St.  
Kāne'ohe, HI 96744



Dear Richard and Estella Houg:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We are very concerned about traffic congestion, pollution, and safety of our community.

Response: As discussed in detail in Section 6.1 of the Draft Environmental Impact Statement (EIS), Transportation, the traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, we want to let you know that Hawaiian Memorial Park (HMP) has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that would have served the new residences. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

Richard and Estella Hoag  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
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HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

2. Concerns about flooding

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

3. Concerns about the forest and birds.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

As discussed in Section 4.8 of the EIS, Fauna, the second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the



immediate, local populations of alien birds, this will provide new foraging space for the wintering Kolea, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pueo, and any of the alien bird species typically found in Windward Oahu. In addition, HMP has modified the development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that includes five archaeological sites and large areas of laua'e fern that are used by hula practitioners. This 9.4-acre area will be retained in its current "natural" state, except for a modest access road.

4. Please respect the Hawaiian culture.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. As discussed above, this includes the previously described cultural preserve.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1350 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*As a 35 yr. resident of Kaneohe, I am very opposed to any further development in our area. I am very concerned about increased traffic, noise, ~~etc~~ and our water quality. I feel strongly about preserving our natural resources, our forest, our watershed, our native plants & animals.*

*I have already witnessed the adverse affect of grading on our own mountainside. Our neighbors experienced tremendous increased flooding after an individual cleared some land above our street. I foresee the same happening to Pihikoa. Stop it!!*

Sincerely, Inez Kaneshiro

Name: Inez Kaneshiro  
Address: 45-119 Moakaka Place  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

October 8, 2008

Inez Kaneshiro  
45-119 Moakaka Place.  
Kāneʻohe, HI 96744

Dear Ms. Kaneshiro:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am very concerned about increased traffic, noise, and water quality.

Response: As discussed in detail in Section 6.1 of the Draft Environmental Impact Statement (EIS), Transportation, the traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, we want you to know that Hawaiian Memorial Park (HMP) has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that would have serviced these lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and are summarized in the paragraphs below.



Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

As discussed in Section 6.4 of the EIS, retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāneʻohe Bay. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP, both for appearance and water quality issues, as well as offsite liability.

2. I feel strongly about preserving our natural resources, our forest, watershed, native plants and animals.

Response: As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

Also, as discussed in Section 4.8 of the EIS, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Koiea*, who forage in grassy areas with a good insect supply. The revegetation of the 1.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Windward O'ahu.

3. I have already witnessed the adverse affect of grading on our own mountainside. Our neighbors experienced tremendous increased flooding.

Response: While we are unsure what grading of the mountainside you are referring to, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

In regard to your question about heavier rainfall over a longer period, there will eventually be storm events in excess of engineering design standards that will not be accommodated by the proposed retention areas. In that case, run-off will sheet flow across the property as it does currently.

It is important to understand the physical characteristics that could be influencing these events. The Pikoloa Tract 10 subdivision was approved by the City and County of Honolulu in 1964. As part of the subdivision, the vast majority of parcels along the eastern sides of Nāmoku and Ohāhā Streets are encumbered by an easement for slope and drainage purposes (Figure 18 of the Draft EIS). These parcels typically are level from the front property line toward the rear of the property, rendering from 1/3 to 1/2 of the property unbuildable because of the slope and the easement, even though the property is zoned for residential use.

The drainage system for these properties was designed as a series of interceptor ditches cut into the slope. These ditches were lined with concrete and extend across all parcels in this system, intending to direct sheet flow to underground storm drains, which eventually empty into Kāwā Stream. The responsibility to maintain these interceptor ditches was left to each individual property owner. As a consequence, there is a wide range of maintenance quality. Inspection of several homes indicated some owners keep their interceptor ditches free of silt, debris, and vegetation. Other property owners have not kept a maintenance protocol, and ditches are overgrown with trees, shrubs, and other vegetation, and are full of soil, incapable of performing their designed function. It is probable there are several factors contributing to flooding occurrences in this neighborhood:

Ms. Inez Kaneshiro  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 5

- (1) slope profile characteristics of each property; (2) design of the interceptor ditch system; (3) uneven maintenance protocol for the entire system.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have been a resident of the windward side for almost 50 years and it has <sup>been</sup> my pleasure bragging about the green mountains. I hope this tragedy of development will not spoil the beauty of "this side of the mountain" which is the Koolaus.

Traffic is already bad and I hope you will let us enjoy our country living.

The windward side is already have less water system and the quality of air is not conducive to our health.

I am not an educated person but I want the best for my family & the best for the future of

Sincerely,  
Anapao Palle Sam  
The windward people.

Name: Anapao Padilla Lee

Address: 45-316 Lehuakula St

City, State, Zip Kaneohe, HI 96764

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Amparo Padilla Lau  
45-316 Lehuuila St.  
Kāne'ohe, HI 96744

Dear Mrs. Padilla Lau:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I hope project will not spoil the beauty of the Koolau mountains.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several graphic figures.

We would like to point out that HMP has modified the Proposed Action in two significant ways that will affect views of the property: (1) the 20-lot residential subdivision has been deleted from the development program; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'eawa'e Heiau.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. Overall, no views of any mountains or ridges will be obstructed by the project.



2. Traffic is already bad.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, as discussed in #1 above, HMP has eliminated the 20-lot residential subdivision and the Lipalu Street extension from the development program. Consequently, no impacts are expected to traffic through your immediate neighborhood.

3. The windward side has poor water system and the quality of air is not conducive to our health.

Response: Windward O'ahu, where the Petition Area is located, receives sufficient precipitation to minimize the need for supplemental irrigation of landscaping. During dry hot periods, particularly during establishment of new landscaping, irrigation will be required. Non-potable water is preferred for irrigation of the cemetery expansion lawn areas by the Board of Water Supply.

Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impact to the quantity of ground and surface water flows." We would also add that because the residential subdivision has been deleted from the development program, no drinking water will be required for new dwellings.

We are confused about your claim that air quality in Windward O'ahu is not conducive to your health. Hawai'i enjoys some of the best air quality

within the United States (except areas exposed to the pollutants associated with the on-going volcanic episode on the Big Island). In September 2008, an air quality analysis was conducted for the project, and found that factors favoring good air quality include the vicinity of the Petition Area to good exposure to tradewinds, and ample open space.

Some short-term direct and indirect impacts on air quality could potentially occur due to project construction, including construction vehicle emissions and particulate emissions connected with clearing, site preparation work, and construction equipment and workers travelling to and from the Petition Area. Contractors will be required to comply with the State Department of Health air regulations to minimize such impacts.

Fugitive dust emissions from construction activities are difficult to estimate accurately because of their elusive nature of emission and because the potential for dust generation varies greatly depending upon the type of soil at the construction site, the amount and type of dirt-disturbing activity taking place, the moisture content of exposed soil in work areas, and the wind speed. Uncontrolled fugitive dust emissions from project construction would likely be somewhere near the level estimated by the U.S. EPA's rough estimate for uncontrolled fugitive dust emissions from construction activity of 1.2 tons per acre per month under conditions of "medium" activity, moderate soil silt content (30%), and precipitation/evaporation (P/E) index of 50. State of Hawaii Air Pollution Control Regulations prohibit visible emissions of fugitive dust from construction activities at the project property line. Thus, an effective dust control plan for the project construction phase will be prepared.

Adequate fugitive dust control can usually be accomplished by the establishment of a frequent watering program to keep bare-dirt surfaces in active construction areas from becoming significant sources of dust. On days without rainfall, construction areas will be watered at least twice during the workday to keep dust to a minimum. Open-bodied trucks will be covered at all times when in motion if they are transporting materials likely to give rise to airborne dust. Haul trucks tracking dirt onto paved streets from unpaved areas are oftentimes a significant source of dust in construction areas. Some means to alleviate this problem, such as tire washing or road cleaning, if appropriate, will be employed. Dust monitoring will be considered as a means to quantitatively evaluate the effectiveness of dust control measures.

On-site mobile and stationary construction equipment also will emit air pollutants from engine exhausts. The largest of this equipment is usually diesel-powered. Nitrogen oxides emissions from diesel engines can be

relatively high compared to gasoline powered equipment, but the standard for nitrogen dioxide is set on an annual basis and is not likely to be violated by short-term construction equipment emissions. Carbon monoxide emissions from diesel engines, on the other hand, are low and should be relatively insignificant compared to vehicular emissions on nearby roadways.

Indirectly, slow-moving construction vehicles on roadways leading to and from the project site could obstruct the normal flow of traffic to such an extent that overall vehicular emissions are increased. This impact can be mitigated by moving heavy construction equipment during periods of low traffic volume. Likewise, the schedules of commuting construction workers can be adjusted to avoid peak hours in the project vicinity. Air quality could be impacted additionally by fugitive dust from disturbance of dry exposed soil, and from increased vehicle emissions due to increases in traffic volume.

Potential operational period impacts of the Proposed Action on the surrounding area include increased air pollution from vehicular emissions. Any long-term impacts on air quality from traffic related to this project will likely be negligible. This impact is not expected to be significant, as there are no major sources of air pollutants associated cemetery uses.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Neal Nakamura  
45-149 Kuumukua Pl.  
Kāne'ohe, HI 96744

Dear Mr. Nakamura:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033-1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns about flooding caused by grading of the ridge and long term construction activities.

Response: As discussed in the Environmental Impact Statement (EIS), construction on the cemetery expansion will not be long term, as the project is broken into 3 phases. Construction for each phase will last approximately 6+ months.

We are uncertain which ridge you are referring to. The main Oneawa Hills ridge will not be graded or touched, as it is not within the Petition Area. Smaller ridges within the Petition Area will be graded. Any grading will have to be part of the grading permit, to be approved by Department of Planning and Permitting, Civil Engineering Branch.

2. Concerns about dust, noise, and heavy vehicle traffic associated with long term construction activity.

Response: Impacts from dust will be minimized by using several Best Management Practices such as watering, mulching, and temporary vegetation. Please refer to #1 for discussion of the project phases. A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS. Their findings are summarized in the following paragraphs. Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction,

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*The turbulence weather the past few years is cause for great concern over flooding caused by grading of the ridges and long term construction activity with associated dust, noise, and heavy vehicle traffic are very undesirable, unwanted aspects of this proposal.*

Sincerely,

Name: Neal Y Nakamura  
Address: 45-149 Kuumukua Pl  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Mr. Neal Nakamura  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

In regards to traffic, we want to let you know that Hawaiian Memorial Park has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

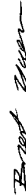
July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I HAVE CONCERNS OF LOSS OF FOREST, LOSS OF NATIVE BIRDS AND NATIVE INSECTS ANIMALS. ALSO THE NEED TO PROTECT THE NATIVE HAWAIIAN GATHERING SCENE (IN CURRENTLY ON LAND. I LIVE BELOW THE GRAVE YARD AND CONCERN ABOUT POSSIBLE FLOODING FROM STORM RUN OFF. IF YOU WOULD TO LIVE IN THE PIKOLAH AREA AND LOOK UP YOU TO WOULD ENJOY THE BEAUTY OF THE HILL SIDE. ALSO HEAR THE BIRDS SINGING EVERY MORNING.

Sincerely,



Name: Brent Yuen

Address: 45-355 LETHAULA ST.

City, State, Zip KANEHE HAWAII 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



October 8, 2008

Brent Yuen  
45-355 Lehuuila St.  
Kāne'ōhe, HI 96744



Dear Mr. Yuen:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033-1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I have concerns about the loss of forest.  
  
Response: As discussed in detail in Section 4.7 of the Environmental Impact Statement (EIS), Flora, the existing vegetation found in the Petition Area is characterized by the presence of non-native species. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.  
  
The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.
2. Concerns about loss of native birds.  
  
Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien

birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area.

3. Loss of native insects.

Response: A survey of native invertebrate resources for the Petition Area was conducted in July 2008 by Steven Lee Montgomery, Ph.D., and the following language has been added to the Section 4.8.1 of the EIS relating to arthropods: "The primary purpose of the survey was to determine the presence or absence in the Petition Area of any endemic or indigenous terrestrial invertebrates, especially any species with legal status under federal or state threatened and endangered species statutes.

The survey methodology included a general assessment of terrain and habitats after reviewing maps and prior reports. Surveying efforts were conducted by day and night to ensure a thorough survey. The property was traversed across all habitat types, alternately following established pathways to search for any native botanical resources and substitute host plant options for native invertebrates. The collection methods used were appropriate for terrestrial invertebrates for the terrain, botanical resources, and target species, and included: 1) host plant searches (visual inspection of resting sites and searching known feeding or breeding sites such as under dead bark); 2) use of sweep nets (a general method of censusing most flying and perching insects where a fine mesh net was swept across plants, leaf litter, etc. to sample any flying or perching insects); 3) visual observation (any visual evidence of arthropod presence or activity. Visual observations provide valuable evidence and are a cross check that extends the reach of sampling techniques); and 4) light sampling, which surveys insects active at night (using a bright light in front of a white cloth sheet).

The survey focused on finding any endemic and indigenous Hawaiian species. No attempt was made to collect or completely document the many common alien arthropod species present in the area. Three native species were encountered: the endemic bug *Trigonoptylus hawaiiensis*, the endemic Moss moth (*Eudonia* sp.); and the endemic small moth or micro-moth (*Mesolobos*). No native mollusks were observed and no invertebrate listed under either federal or state endangered species statuses was located. The extremely low level of native plants serving as arthropod hosts is most likely the reason for the absence of Hawaiian arthropods in the Petition Area." To Section 4.8.2, Probable Impacts, the following language was added:

"No Federal or state listed endangered or threatened invertebrate species were found in the Petition Area; nor were any rare native Hawaiian

invertebrate species observed. The few native Hawaiian invertebrates observed are widespread in distribution. The anticipated actions related to the Proposed Action are not expected to have a significant negative impact on an endemic or indigenous species. No part of the property is designated critical habitat for any threatened or endangered species."

4. Protection of Hawaiian gathering sites.

Response: The landowner is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point in time, attempts to have groups come forward and identify where they are gathering *laua'e* have been unsuccessful. As a result, in August 2008, we sent our botanical consultant back into the field to locate appropriate communities of the *laua'e* fern using Global Positioning System technology. As a result, the development program for the project has been modified to incorporate a 9.4-acre cultural preserve that will include areas where *laua'e* is plentiful.

5. Concerns of possible flooding from storm runoff.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

6. Beauty of the hillside view and hearing birds singing.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the

Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kōlea*, who forage in grassy areas with a good insect supply. Revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Windward O'ahu.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My concern is the volume of water that will come off the new expansion. My back yard floods to a depth of 2 inches when we have excessive rain such as every hurricane and storm that lasts a few days (such as the 40 days of rain in 2006). Fortunately my house doesn't flood because it is an inch higher than the water floods. How much more water will come down in volume after they clear the land? How much will be mud because the development isn't finished? Sincerely, If my home is damaged because of a direct result of the construction can I litigate for damages?

Name: Marco DiBartolomeo

Address: 45-218 Hikiwale St.

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Has anyone done a study about the volume of water that comes off the existing cemetery site versus the mountain wooded areas around it? What is the difference of the volume of water runoff?

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Marco DiBartolomeo  
45-218 Hikiwale St.  
Kailua, HI 96734

Dear Mr. DiBartolomeo:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My concern is the volume of water that will come off the new expansion. How much more water will come down in volume after they clear the land? Has anyone studied the difference in volume from existing cemetery site versus the mountain wooded area?

Response: The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). This translates into a volume of 84,450 cubic feet of stormwater. This volume of runoff will be controlled by a system of retention areas scattered throughout the project. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and will allow sediment to settle before water slowly percolates into the soil or evaporates.

The Preliminary Engineering Report completed for the project did examine the difference in volume from existing forest and the proposed cemetery expansion. Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing

rainfall runoff. The reference used was the City and County of Honolulu Department of Planning and Permitting's Rules Relating to Storm Drainage Standards of January 2000.

2. If my home is damaged because of a direct result of the construction can I litigate for damages?

Response: Hawaiian Memorial Park (HMP) will require appropriate insurance and indemnifications from contractors doing work with in the park for purposes of protecting HMP and adjacent residents, property owners, and public agencies.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

We have concerns that there will be many more mosquitoes hatching in the proposed catchment ponds. What will be done to address this? It seems that there is tremendous erosion to the hills presently how will cutting down trees help this situation Has anyone addressed the value of the property in the area as increasing or decreasing as a result of the development

Sincerely,

Andrew Johnson

Name:

P.O. Box 1355

Address:

City, State, Zip Keolu HI 96734

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Andrew Johnson  
PO Box 1355  
Kailua, HI 96734

Dear Mr. Johnson:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns that there will be more mosquitoes hatching in the proposed catchment ponds. What will be done to address this?

Response: Retention areas are included in the Draft Environmental Impact Statement (EIS) to control storm water runoff. They are not permanent ponds or dams of water, and will be reviewed and approved by the County Department of Planning and Permitting. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters, and includes a wide variety of individual design techniques that can be used in appropriate circumstances. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. Properly designed and maintained retention areas are not suitable habitat for mosquitoes.

Exact design criteria for the retention areas and appropriate substrate treatment will be determined after percolation tests are done on the soils. Proper design for retention areas ensures that water does not remain longer than three days; mosquitoes cannot complete a breeding cycle in this short of a time period. The project will include a Drainage Maintenance Plan that spells out the monitoring and maintenance protocol for the retention areas. Overall, the maintenance measures undertaken to meet water quality goals will also act to ensure these retention areas do not become mosquito breeding habitats.



No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

2. Concerns about erosion

Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

3. Has anyone addressed the impact of the project on property values?

Response: There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community and people have accepted them as neighbors. This is also the case for HMP. In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. On average, property values and home sale prices are not any lower for the Parkview neighborhood than for the Pikoioa neighborhood. Additionally, some studies that examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price.

Mr. Andrew Johnson  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 3

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I live near the development area and have seen both ma kahi & pu'o in my area - I'm sure that the brief observation of the area that we have would not be sufficient to see these birds a few hours, days, will not be enough time and how many of your observers have been around at dawn and dusk to see the pu'o??  
It's a remarkable sight and not one that should be easily taken away from our children.

Sincerely,

Name: Aileen M. Best

Address: 45-630 Kaala Pl.

City, State, Zip Kaunohi 45 96704

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Glen M. Root  
45-620 Koai'e Pl.  
Kāne'ohe, HI 96744

Dear Mr. Root:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 regarding the above-mentioned project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I live near the development area and have seen both amakihi and pueo in my area. I'm sure that the brief observation of the area that was done would not be sufficient to see these birds. How many of your observations have been around at dawn and dusk to see the pueo?

Response: As described in Section 4.8.1 and Appendix E of the Draft Environmental Impact Statement (EIS), the survey methodology for the avifauna and feral mammal survey of the Petition Area included a walkthrough of the site during early morning, late afternoon, and early evening hours when birds and mammals are more active and observable. The EIS does not dispute that these birds are possibly in the area, noting "although this species was not recorded during the present survey, it is possible that *Pueo* could occasionally forage in the area. The *O'ahu 'Amakihi* is seen in similar habitat on O'ahu and could possibly also occur at this site." (p. 4-21). The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, and *Pueo*. Additionally, there is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few *Pueo* that still exist on O'ahu would require.

Mr. Glen Root  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My concerns with your proposed developme  
#1 I do not feel that you and your company  
SCI will honor your promise that we  
would be allowed to gather ferns & plants  
#2 I do not feel that you and your  
Company, <sup>SCI</sup> are willing to work with the  
Community, how can you prove that you  
will honor your words.

Sincerely,

Name: Kathy A Seiple (KATS)  
Address: 914 Kainui Dr  
City, State, Zip KAILUA, HI 96734

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My concern is that you and your  
company SCI are not willing to  
respect our land, our animals and  
our people.  
How will you protect our environment  
from destruction, when you only see  
a money making opportunity.  
~~leave~~  
I'm concerned about flooding, how you  
will prevent this when you propose removing  
all the trees.

Sincerely,

Name: Kathy A. Seiple (Kats)  
Address: 914 Kainui Dr  
City, State, Zip Kailua, HI 96734

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Kathy Seiple  
914 Kainui Dr.  
Kailua, HI 96734

Dear Ms. Seiple:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohē, O'ahu, Hawai'i**

Thank you for your two letters dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in both your letters, followed by our response:

**Letter #1**

1. Concerns that people won't be allowed to gather ferns and plants, and that Petitioner is not willing to work with the community

Response: The landowner is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point, in time, we have been unsuccessful with our attempts to have groups come forward and identify where they are gathering lauā'e. In preparation for the Final Environmental Impact Statement (EIS), we instructed our botanist to conduct a GPS mapping project of the acres where lauā'e are plentiful. In an effort to protect these areas of lauā'e and archaeological sites in the area, Hawaiian Memorial Park has modified the project development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau.

**Letter #2**

1. Concern that not willing to respect our land, animals, or people.

Response: Following Chapter 343, Hawai'i Revised Statutes, an EIS is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and

Ms. Kathy Seiple  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2



propose measures to either avoid or minimize adverse impact to the environment.

2. Concerned about flooding, how will you prevent this when you propose removing all the trees?

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

We are not proposing to remove all of the trees. Some of the existing non-native forest will be changed to cemetery grounds with turf and over 300 trees, and 11.4 acres will be revegetated with appropriate native plant material. Additionally the 9.4-acre cultural preserve will remain intact and in its "natural" state, except for a modest access road. At full build-out, 51.7 acres of the Petition Area will remain in open space.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I have many concerns regarding the possible development and re-zoning of Hawaiian Memorial Expansion - many. First, I want to know WHY you do not address the current underwater stream concerns that affect our community (specifically Lupo St) in large storms that last longer than 1 hour? Then, if you still have not addressed this, why would you not address this and only address the "additional" runoff (and only based on a "10 year, 1 hour storm" - that is ridiculous - it is Kanaha - during the rainy season it runs for hours off and on...). I want to know how the current flood concerns and additional ones will be realistically addressed. I have many other concerns - how will you protect the Hawaiian-ists as well? I would like to know how this issue will be addressed.*

*Sincerely,*  
*Lisa K. Pimental-Dias*

Name: Lisa K. Pimental-Dias  
Address: 45-407 Lupo St.  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Lisa Pimental-Dias  
45-407 Lupo St.  
Kaneohe, HI 96744

Dear Ms. Pimental-Dias:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kaneohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Need to address current underwater stream concerns that affect nearby community, specifically Lupo St. in large storms that last longer than 1 hour.  
Response: We are not aware of an underwater stream near Lupo Street, and are unsure what underwater stream concerns you are referring to.
2. Why does the project only address the 'additional runoff based on the 10-year 1-hour storm'?  
Response: As stated in the Environmental Impact Statement (EIS), this is the engineering requirement for projects as set forth by the City and County of Honolulu Department of Planning and Permitting (DPP) Rules relating to Storm Drainage Standards of January 2000, which states that any increased runoff generated by a project be retained on-site for the duration of the 1-hour, 10-year storm event.

3. How will current flood concerns and additional ones be addressed?

Response: Discussion of increases in storm water attributable to the Proposed Action is included in detail in Section 6.4 of the EIS. Drainage, including a detailed description of on-site drainage facilities. Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle



before water slowly percolates into the soil or evaporates. It is important to note that prior to commencement of any construction activities, the Petitioner must submit a detailed drainage study to the DPP, which must indicate how any increases in storm water runoff for the county design storm event attributable to the development, will be retained on-site.

4. How will the Hawaiian sites be protected?

Response: We are pleased to let you know that HMP has modified the development program for the project by creating a 9.4-acre cultural preserve that includes five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau, and large areas of laua'e to be protected for hula practitioners and others who gather this plant. Subsequent to obtaining land use approvals, a Preservation Plan will be prepared for the historic and cultural resources in accordance with §13-277-3 of the Hawaii Administrative Rules.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

As a resident of Kneehoe / Pikoioa, since 1964, I have always enjoyed the beauty of the mountains. I feel what you & your company are proposing to do is nothing more stripping our land, our aina and turning it into sugarcane. We don't need to look at the mountains and see more homes & buildings. The loss of the trees, forest, wildlife and beauty will be gone forever! Don't turn our aina into something we'll never be able to enjoy.

Sincerely,

Danny Gomez

Name: Danny Gomez

Address: 45-395 Namoku St

City, State, Zip Kneehoe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

October 8, 2008

Danny Gomez  
45-395 Namoku St.  
Kāne'ohe, HI 96744

Dear Mr. Gomez:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1

Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns about loss of hillside view.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several graphic figures. We thought you should know that the 20-lot residential subdivision has been eliminated from the development program. This development program is referred to as the "Cemetery Only Alternative", which is now the Proposed Action. The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. In addition, a 9.4-acre cultural preserve has been created for archaeological sites and laua'e fern gathering. This area will retain the same look it currently has, as this area will not be altered except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.



2. Concerns about the loss of forest and wildlife.

Response: As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kolea, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pueo, and any of the alien bird species typically found in Windward O'ahu.

Mr. Danny Gomez  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 3

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have lived in Kawaeha (Pikeoia) area for over 30 years. I have seen water run off by lopo st going to river 3ft high. So planning to re-tail additional runoff from new roads & houses is not adequate will also add pollution to Kawaeha and Kawaeha bay which still needs clearing.

Planning for a 10 year 1 Hour storm is inadequate, since Kapuwahala had problems with run off water flooding that area.

Sincerely, *Alvin Case*

Name: Alvin Case

Address: 45-316 Kawaeha St

City, State, Zip Kawaeha HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Alvin Lau  
45-316 Lehuuila St.  
Kāne'ohe, HI 96744



Dear Mr. Lau:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns about additional runoff; planning for the 10-year 1-hour storm is inadequate.  
Response: The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). These standards are applied to all development on O'ahu.
2. Concerns about added pollution to Kawa Stream and Kāne'ohe Bay.

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwa Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will

Mr. Alvin Lau  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

capture all of the runoff generated by the daily rainfall events used to generate the Kāwa Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwa Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and water quality issues, as well as offsite liability.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Robert Tom  
45-110 Namoku St.  
Kāne'ohe, HI 96744

Dear Mr. Tom:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Drainage pipes near Lupo and Namoku streets not adequate to handle more water runoff during a heavy rain.

Response: As discussed in Section 6.4 of the Environmental Impact Statement (EIS), Drainage, the City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). This design requirement will help reduce impacts on neighboring drainage systems.

The engineering consultants for this project, SSFM International, reviewed drainage reports and drawings for the area around Hawaiian Memorial Park and made a similar observation about the neighboring drainage system. This finding is included in their report, which is attached to the EIS as Appendix C.

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*Drainage pipes at or near Lupo and Namoku Sts, are not adequate to handle more water runoffs during a heavy rain.*

Sincerely,



Name: Robert Tom  
Address: 45-110 Namoku St.  
City, State, Zip: Kaneohe, HI, 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



Mr. Robert Tom  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

We live right below the area you are planning to build behind your cemetery and believe crime rate will go up. Can you guarantee this will not happen.

I've seen the damage when the rain is heavy, with less trees I am sure this will happen.

The traffic in our area will increase and make it dangerous for our children.

I also believe it will impact the address of our area with out all the trees you plan to dig up.

Sincerely,

*Palmer O. Suter*

Name: Palmer O. Suter

Address: 45-427 Ohaha St.

City, State, Zip: Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners



October 8, 2008

Valerie Tsutsumi  
45-427 Ohaha St.  
Kāne'ohe, HI 96744



Dear Ms. Tsutsumi:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Believe crime rate will go up. Can you guarantee this will not happen?  
  
Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.  
  
Hawaiian Memorial Park (HMP) is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.
2. I've seen the damage when the rain is heavy, with less trees I am sure this will worsen.  
  
Response: It is important to understand that of the total 56.5-acre Petition Area, only 4.8 acres (8.5%) will be converted to impervious surfaces. Approximately 30 acres will be converted to cemetery use, leaving approximately 21 acres in a vegetated non-cemetery open space condition, including 9.4 acres that will be set aside to preserve archaeological sites and communities of laua'e fern. In this context, a

forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. Plus, hundreds of new trees will be planted in the new cemetery area. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates.

3. The traffic in our area will increase and make it dangerous for our children.  
  
Response: As discussed in detail in Section 6.1 of the Environmental Impact Statement (EIS), Transportation, the traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project.  
  
In regard to your immediate neighborhood, the Petitioner has decided to modify the Proposed Action by eliminating the 20-lot residential subdivision and the Lipalu Street extension from the development program. As a result, there are expected to be no impacts from traffic through your immediate neighborhood.
4. I also believe the project will impact the coolness of our area without all the trees you plan to dig up.  
  
Response: The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed HMP expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.  
  
Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study

Ms. Valerie Tsutsumi  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned that their development will compromise the health and welfare of the residents of the existing neighborhood as well as residents of the proposed new homes. I envision damage to property due to land erosion - both for the lower-lying, older neighborhood and the proposed new homes and the cemetery buildings and plots. It is ~~disgraceful~~ disgraceful and morally criminal to build over a <sup>native</sup> cultural complex. Shame on SCL.*

Sincerely,

Name: Kay Mendes

Address: 45-431 ~~45-441~~ Waiwala Pl.

City, State, Zip Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Kay Mendes  
45-431 Waiwai Pl.  
Kāne'ohe, HI 96744

Dear Ms. Mendes:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am very concerned about health and welfare of residents of existing neighborhood and future residents.  
  
Response: Following Chapter 343, Hawai'i Revised Statutes, an Environmental Impact Statement (EIS) is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. Several aspects of health and welfare of residents is included as part of the analysis of the EIS.
2. Concerns about land erosion for both existing and future proposed homes, cemetery plots and buildings.  
  
Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the



grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. In terms of proposed homes, we would like to let you know that Hawaiian Memorial Park (HMP) has modified the development program for the project and eliminated the 20-lot residential subdivision and the Lipalu Street extension that would have serviced those lots.

3. Concern about native cultural complex.

Response: The statements about these sites being part of a whole complex are well taken. As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the AIS and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, HMP has modified the development program in a second important manner by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The cultural preserve will be left in its current "natural" condition except for a modest access road.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Karen and Manuel Vidinha  
45-468 Lipalu St.  
Kāne'ohe, HI 96744

Dear Karen and Manuel Vidinha:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about traffic and that more traffic will mean more danger for our children and grandchildren.

Response: As discussed in detail in Section 6.1 of the Draft Environmental Impact Statement (EIS), Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, Hawaiian Memorial Park (HMP) has decided to modify the project development program, and the 20-lot residential subdivision and the Lipalu Street extension to service these lots will be abandoned. Therefore, there are expected to be no impacts from traffic through your immediate neighborhood.

2. Concerned about flooding and runoff that already exists.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*We don't want our road to become a major roadway from when  
I am concerned about traffic. We've already had  
flooding and storm drain covers flying in the air. We  
live on Lipalu St. When we purchased our home 38-39 yrs. ago, it was  
because we didn't have to worry about traffic.  
This was a dead end and cul-de-sac. We had opportunity to buy  
else where but felt this was a perfect place to bring up our  
family. We already have run off from the mountain & did a lot  
to collect it. We've seen runs on our fence & we have a  
lot of birds that are just beautiful. Please don't decrease  
our beautiful mountain and community. I'm afraid more traffic  
will mean more danger for our children & grandchildren. Right  
now it's so cool with all our huge trees on mountain & every  
we a lot of shade & protection from storms. ~~the weather is perfect part~~  
of our land ~~is~~ is mountain. We don't want the grassy area next to  
Sincerely, us, which will give us no privacy which we now enjoy.  
Manuel Vidinha We don't want any vandalism/land crime. We've had  
Karen Vidinha a good neighbor hood & hope it stays this way.*

Name: KAREN & MANUEL VIDINHA

Address: 45-468 LIPALU ST.

City, State, Zip KANE'OHĒ, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

exposure to these events. It is important to understand the physical characteristics that could be influencing these events. The Pikoioa Tract 10 subdivision was approved by the City and County of Honolulu in 1964. As part of the subdivision, the vast majority of parcels along the eastern sides of Nāmoku and Ōhāna Streets are encumbered by an easement for slope and drainage purposes (Figure 18 of the EIS). These parcels typically are level from the front property line toward the rear of the property, rendering from 1/3 to 1/2 of the property unbuildable because of the slope and the easement, even though the property is zoned for residential use.

The drainage system for these properties was designed as a series of interceptor ditches cut into the slope. These ditches were lined with concrete and extend across all parcels in this system, intending to direct sheet flow to underground storm drains, which eventually empty into Kāwā Stream. The responsibility to maintain these interceptor ditches was left to each individual property owner. As a consequence, there is a wide range of maintenance quality. Inspection of several homes indicated some owners keep their interceptor ditches free of silt, debris, and vegetation. Other property owners have not kept a maintenance protocol, and ditches are overgrown with trees, shrubs, and other vegetation, and are full of soil, incapable of performing their designed function. It is probable there are several factors contributing to flooding occurrences in this neighborhood: (1) slope profile characteristics of each property; (2) design of the interceptor ditch system; (3) uneven maintenance protocol for the entire system.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). As discussed in Section 6.4 of the EIS, retention areas are the preferred method to control storm runoff. The retention areas will retain storm water that will then percolate into the soil and/or evaporate, and allow sediment to settle, instead of reaching drainage ways, streams, and Kane ōhe Bay. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

3. We've seen owls on our fence and we have a lot of birds that are just beautiful.

Response: As discussed in Section 4.8 of the EIS, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kolea, who forage in grassy areas with a good insect supply.

Also, as noted in the EIS, Section 4.8, the short-eared Owl or *Pueo* (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible *Pueo* could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *Oahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Windward Oahu. There is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few *Pueo* that still exist on Oahu would require.

4. Right now it's so cool with all our large trees on mountain giving us a lot of shade and protection from storms.

Response: The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed cemetery expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.

Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

All told, when the cemetery is at full build-out, 51.7 acres (91.5%) of the 56.5-acre Petition Area will remain in open space. 29.5 acres will be devoted to burial areas and will be planted with over 300 new trees. 20.9 acres will either be revegetated or remain in existing forest habitat.

5. We don't want the graveyard next to us which will give us no privacy.

Response: As described in Section 4.10 of the EIS, a buffer of at least 50 feet will be maintained between the new cemetery and existing residential homes. In many areas, this will be over 150 feet. There will more privacy and buffering between the proposed cemetery and homes in your neighborhood than currently exists between the residential homes. In addition, HMP has modified the project development program by eliminating the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. Additional traffic on Lipalu Street will therefore be avoided.

6. We don't want any vandalism and crime.

Response: It is understandable that you do not want vandalism and crime. HMP does not wish for this either. There is not expected to be an increase in crime with the Proposed Action. According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate

through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

William N. Rodenhurst  
45-418 Nakulua Pl.  
Kāne'ohe, HI 96744

Dear Mr. Rodenhurst:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My main concern is the water that is needed for daily use when the project is completed. The pressure to supply this area is already low and I can see it getting lower.

Response: The Petitioner has decided to eliminate the 20-lot residential subdivision from the development program, and the need for drinking water for domestic purposes will also be eliminated. The need for irrigation water still exists, and options are discussed in Section 6.2.2 of the Draft Environmental Impact Statement (EIS). First choice is on-site wells owned and operated by the Petitioner. Second choice would be to use the Board of Water Supply domestic system. It should be noted that in a typical year, very little supplemental irrigation will be required for the cemetery landscape areas, especially after plant material and turf has been established.

Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*My main concern is the water that is needed for daily use when this project is completed. The pressure to supply this area is already low and I can see it getting lower. It also will be an eye sore for anybody that is driving over to the windward side. I have lived in the Pikoike area of since July 1967 and have seen a lot of runoff of water from the many streams that come through the area. Where will that go, it will always be with us. Mother nature never waits for anybody. Mahalo*

Sincerely,



Name: William N. Rodenhurst

Address: 45-418 NAKULUA ST

City, State, Zip KANEHOE HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

2. The project will also be an eyesore for anybody that is driving over to the Windward side.

Response: While the Petition Area will be visible from some long-range viewpoints approaching Kāne ohe, the overall appearance of the property will still be dominated by the green colors of open space and hundreds of new trees which will be planted as landscape treatment. The borders of the cemetery with existing neighbors will be maintained with existing vegetation and supplemented with additional native and indigenous plants in transition to the cemetery.

Further, the Proposed Action has been modified to incorporate a 9.4-acre cultural preserve into the plan, which sets aside an area to protect archaeological sites and communities of the lauau fern for gathering purposes. We believe that with the elimination of the residential subdivision, the addition of the 9.4-acre cultural preserve, and the generous landscaping element of the plan, the overall appearance of the Petition Area will be a positive experience.

3. I have seen a lot of runoff from the many storms that come through the area. Where will that go?

Response: Retention areas are proposed as the preferred method to control runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). Stormwater that is not collected by the retention areas will flow downhill, following the topography.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have several concerns about the proposed 20 year project of HMP or SCI. This is my neighbor hood and the EIS does not properly cover my concerns. Pikoiloa is a beautiful natural valley of conservation land. SCI upon purchase knew that it was zoned for conservation. It should remain conservation land for future generations. There are many significant archeological sites that stress that this area was once a significant village. There is a remain untouched, not paved around. There is a fantastic population of forest birds who sometimes frequent my yard. If you cut the forest, the birds will be gone. The EIS says the view from my house Sincerely, impacted, it will impact the view from my house. My street, all over the neighborhood even from H-3. Do the Right thing!

Name: Carol Fontanive

Address: 45-155 Unaha Pl.

City, State, Zip Kaneohe HI 96714

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Carol Fontanive  
45-155 Unaha Pl.  
Kāne'ohe, HI 96744

Dear Ms. Fontanive:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. SCI upon purchase knew the land was zoned conservation and it should remain conservation for future generations.  
Response: Oftentimes, uses for land must change over time to accommodate needed community services. Landowners have a right to ask for a review of their land use status, as provided by State and County land use laws.
2. There are many significant archeological sites that show this area was once a significant village. These sites should remain untouched, not paved around.  
Response: The statements about these sites being related are well taken. These sites are indeed a component of the present landscape, but whether they were in use at the same time in an integrated community is yet to be determined and would require extensive further study in addition to that included in the scope for the inventory survey.

As noted in the Draft Environmental Impact Statement (EIS), the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the historic sites in the vicinity of the Kawā'ewa e Heiau are part of a complex of cultural sites, not



discrete sites. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, the program for the Concept Plan has been modified, and the project will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the *laua'e* fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

3. There is a fantastic population of forest birds. If you cut the forest, the birds will be gone.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Ko'lea*, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihī*, *Pueo*, and any of the alien bird species typically found in Windward Oahu.

4. The EIS says the views will not be impacted, it will impact the view from my house, my street, all over the neighborhood, and H-3.

Response: Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS, including from the H-3 freeway. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. The Petition Area and associated cemetery are visible from the H-3 freeway, although as a small portion of the overall viewshed which is predominately one of residential neighborhoods with the Oneawa Hills as a backdrop. Additionally this view is seen for only a matter of seconds while travelling at 55 miles per hour in a car. Nevertheless, the Petition Area and project are visible from this vantage point.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Ruth Hirai  
45-175 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Hirai:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Some of my concerns are possible flooding.

Response: As discussed in detail in the Environmental Impact Statement (EIS), Section 6.4, retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

2. Concerned about affect of the visual beauty of Kaneohe.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures.

We should also point out that HMP has modified the Proposed Action in two significant changes that will affect views of the property: (1) the 20-lot residential subdivision has been deleted from the development program;

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I just attended my first SaveKaneohe.org meeting and found it informative. Please send me a copy of the EIS so that I may be better informed.*

*Some of my concerns are possible flooding, affect of the travel beauty of Kaneohe, and traffic and noise that will result with the expansion of HMP. The recent flood that resulted after the rains is worrisome. Further development of the hillside may cause additional flooding. As I drive to the windward side, via H3, Likelike Highway, or the Pali, it is relaxing and beautiful to see the town of Kaneohe or the ocean beyond Palua. Further development of HMP will impact this view. As I live in a main thoroughfare through our community Sincerely, further development will add to the view, traffic, and pollution of our subdivision.*

*Ruth Hirai*  
Name: Ruth Hirai Please stop your plans to expand HMP.  
Address: 45-175 Namoku St.  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'ewa'e Heiau.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. Overall, no views of any mountains or ridges will be obstructed by the project.

3. Concerned about traffic.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, as discussed in #2 above, HMP has eliminated the 20-lot subdivision from the development program. As a result, the Lipalu Street extension has also been eliminated. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

4. Concerned about noise and pollution.

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and are summarized below. Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds

of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Donna Rodenhurst  
PO Box 5422  
Kāne'ohe, HI 96744

Dear Ms. Rodenhurst:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Having only two 1x1 digs for 56.6 acres does not prove anything. More needs to be done.

Response: The State Historic Preservation Division (SHPD) has commented on the Archaeological Inventory Survey prepared for the project, and the necessity for and locations of further subsurface testing will be determined by closely working with SHPD as the project moves forward.

2. Runoff from new roads and houses causes alarm for flooding, pollution from storm runoff.

Response: First, we want you to know that Hawaiian Memorial Park (HMP) has decided to modify the project development program by (1) eliminating the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots; and (2) creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau and areas where the laua'e fern is plentiful. These actions result in a project where only 4.8 acres (8.5%) of the 56.5-acre Petition Area will be converted to impervious surface. The remaining 51.7 acres (91.5%) will be a combination of landscaped turf and over 300 new trees, and revegetated and existing forest.

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

HERE ARE A FEW CONCERNS I HAVE WITH THE DEVELOPMENT OF HAWAIIAN MEMORIAL:

- HAVING ONLY TWO 1x1 DIGS FOR 56.6 ACRES DOES NOT PROVE ANYTHING, MORE NEEDS TO BE DONE.
- RUNOFFS FROM THE NEW ROADS: HOUSES CAUSES ALARM FOR FLOODING, POLLUTION FROM STORM RUNOFF. HOW CAN YOU GUARANTEE IT WON'T SINCE OUR WEATHER CAN VARY? REMEMBER THE 40 DAYS OF RAIN?
- BUILDING THIS GIVES HUGE CONCERN TO INCREASE CRIME. THIS WILL GIVE ACCESS TO OUR YARDS/HOUSES AND A QUICK GET AWAY.
- YOU NEED TO RESPECT OUR CULTURE WITH OUR WAYS. JUST GIVING ACCESS TO PICK LAUAE ~~WAS~~ DOESN'T MAKE UP FOR ALL THE FOREST YOU ARE KNOCKING DOWN.

Sincerely, *Keep Kanoehe Country, I don't want to see every inch developed!*  
Donna Rodenhurst  
Mahele, Donna Rodenhurst

Name: Donna Rodenhurst  
Address: P.O. Box 5422  
City, State, Zip: Kāne'ohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

As discussed in detail in the Environmental Impact Statement (EIS), retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters.

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

3. Concern to increase in crime and easy access to yards and houses and a quick getaway.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu. HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

4. Need to respect culture; just giving access to pick laua'e doesn't make up for all the forest you are knocking down.

Response: As discussed in #2 above, HMP is clearly aware of the need to recognize traditional gathering rights on the property. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites. We also draw your attention to our

proposed landscape plan (300 new trees, 11.4 acres of revegetated open space) and the 51.7 acres of open space once the project is complete.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

John W. Kapiko Jr.  
45-520 Nakulua St.  
Kāne'ōhe, HI 96744

Dear Mr. Kapiko:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Kāne'ōhe is the last remaining area that is not impeded with traffic.

Response: As discussed in detail in Section 6.1 of the Environmental Impact Statement (EIS), Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. We would like to let you know that Hawaiian Memorial Park has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service those lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*PLEASE REMOVE AND AS. EVERYTHING IN  
KANE OHE AREA IS THE LAST REMAINING  
AREA THAT IS NOT IMPEDED WITH TRAFFIC  
PROBLEMS AND YOU ARE GOING TO DESTROY THE  
AREA BECAUSE OF GREEDY DEVELOPERS AND FROM  
THE MAINLAND WHO DON'T GIVE A DAMN ABOUT  
ANYTHING EXCEPT FOR THE ALMIGHTY DOLLAR!  
THE HAWAIIANS WERE RIGHT ABOUT THE  
MISSIONARIES. THE DEVELOPERS ARE DOING THE SAME.  
LOOK UP AND PRAY TO GOD. WHEN YOU LOOK DOWN  
YOUR LAND WILL BE GONE!!*

Sincerely,

Name: JOHN W. KAPIKO JR.

Address: 45-520 NAKULUA ST.

City, State, Zip KANE'ŌHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Mr. John W. Kapiko Jr.  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I'm concerned about possible roadwork  
onto Pahaia Nani property when I die. The area  
over from Pahaia Nani which means "Surrounded  
by Beauty." I'd like to keep it that way.*

Sincerely, *William C. Vinet, Jr.*

Name: WILLIAM C. VINET, JR.

Address: 45-090 NAMOKUO ST, HPL 1215

City, State, Zip: Kaunohi, HI 96744-5316

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

William C. Vinet, Jr.  
45-090 Narmoku St. Apt. 1215  
Kāne'ohe, HI 96744



Dear Mr. Vinet:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about a possible landslide onto Pohai Nani property, where I live.  
Response: We do not believe there is a possibility of a landslide onto Pohai Nani property as a result of development on Hawaiian Memorial Park property. A report on rockfall hazards and slope stability was prepared for the Draft Environmental Impact Statement (EIS), and was attached as Appendix B. The slope stability analysis determined that there is no apparent potential for hazards to the Petition Area that may be associated with slope stability. In addition, Pohai Nani is not in a direct downslope direction of any of the areas to be developed.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

*Scott Ezer*

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*My wife and I live on the 10th Floor  
at Pohai Nani - "Surrounded by Beauty".  
The view of the mountains, unobstructed,  
is certainly a major reason we moved  
here from Kailua.*

*If you succeed in building a cluster  
of houses on the hill to our south,  
you will deprive us of a source of  
pleasure we have counted on - a nature  
view at it's best. We strongly think  
conservation on land should not be changed.  
Just so you can make extra bucks!*

Sincerely,

*Robert C. Hockaday*

Name: Robert C. Hockaday / Martha F. Hockaday

Address: 45-090 Narmoku St #1004

City, State, Zip Kāne'ohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Robert C. and Martha F. Hockaday  
45-090 Namoku St. #1004  
Kāne'ohe, HI 96744

Dear Mr. and Mrs. Hockaday:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We live in Pohai Nani. The project will deprive us of a view of the mountains and nature at its best.

**Response:** The view from Pohai Nani is not a public view, and while the project will change the view from Pohai Nani, the view will still be predominately one of green open space one. We would like to tell you that Hawaiian Memorial Park has modified the development program by eliminating the 20-lot residential subdivision and adding 9.4-acre cultural preserve east of Kawāewa'e Heiau. The cultural preserve will remain intact, except for a modest access road.

The cemetery expansion will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area. Also, the area near Pohai Nani is in Phase 3 of the development, and will not be developed for 10-15 years.

2. We strongly think conservation land should not be changed.

**Response:** We note your opposition to the Proposed Action.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Mr. & Mrs. Hockaday  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have three questions for you: 1. Can you assure me that the development you are proposing will not despoil the environment that we at Pohai Nani and all the other home owners living in this area will no longer be able to enjoy this beautiful place?  
2. I am a Kupuna, and we Hawaiians are taught to respect and honor our sacred sites; can you assure me that we will have access to unchanged cultural sites and that no Hawaiian burials will be disturbed by your development?  
3. The native plants and trails that are found in this area indicate that we Hawaiians still use this area as a cultural site; can you assure me that you can really restore the unique flora that you would be destroying?

Sincerely, Eleanor Lindo

Name: Eleanor Lindo  
Address: 45-090 Namoku St. #612  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Eleanora Lindo  
45-090 Namoku St. #612  
Kāne'ohe, HI 96744

Dear Ms. Lindo:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Can you assure me that the development will not despoil the environment?  
Response: Following Chapter 343, Hawaii'i Revised Statutes, an Environmental Impact Statement (EIS) is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. An EIS was prepared for the project, and the Petitioner will follow all mitigation measures to ensure there is no overall significant impact associated with the project.
2. Can you assure me that we will have access to unchanged cultural sites and that no Hawaiian burials will be disturbed by your development?  
Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites. In this context, we want to let you know that Hawaiian Memorial Park (HMP) has decided to modify the development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau.

The landowner is clearly aware of the need to recognize traditional gathering rights on the property. The cultural preserve that will be created will also include significant areas where the lau'e fern is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

No human burials have been documented within the Petition Area, and CIA contributors did not specifically mention knowledge of *imi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. Access arrangements will be documented as part of the Preservation Plan that will be prepared for the property at a later date.

3. The native plants and trails that are found in this area indicate that we Hawaiians still use this area as a cultural site. Can you assure me that you can really restore the unique flora that you would be destroying?

Response: The areas of lau'e will be protected within a cultural preserve, as discussed in the answer to Question #2 above. Also, as discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat, and is not unique. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. This includes the lau'e plant which is gathered by hula practitioners. This species was introduced to Hawai'i after contact, and has been adopted by practitioners to replace a similar, less abundant species. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

We have coordinated with the Department of Land and Natural Resources (DLNR) Na Ala Hele Trail and Access Program on the appropriate

approach to the recreational trail that appears to traverse part of the Petition Area. DLNR has confirmed that this is not an ancient trail. HMP has no obligation to maintain or provide amenities for the recreational trail, but will certainly work to reasonably accommodate official hiking trails as long as respect for our families is shown.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

In regard to Section 4.8 of the EIS, Fauna, the short-eared Owl or *Pueo* (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible *Pueo* could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, *Pueo*, and any of the alien bird species typically found in Windward O'ahu.

3. The loss of trees and plants bring with it a great potential for runoff.

Response: Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by

the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu DPP's Rules Relating to Storm Drainage Standards of January 2000. We would like to point out that only 4.8 acres (8.5%) of the total 56.5-acre Petition Area will be changed to an impervious surface. The balance of the Petition Area will be in open space, with 9.4 acres remaining in their present state.

4. Support leaving Mahinui as conservation land. Please think of other alternatives and solutions to your problem.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Virginia S. Naquin  
45-090 Namoku St.  
Kāne'ohe, HI 96744



Dear Ms. Naquin:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Hawaii's resources are finite. Regulation is vital for the essentials of water and energy as this State population grows. The stress on traffic and public facilities is already a critical strain on this Island. Conservation means much more than what you see. Water supply, sources and distribution are vital.
- Response: We agree that Hawaii's resources are finite and need protection. Nevertheless, it is essential that we plan for the future, which includes an increased population with a significant increase in the percentage of our residents who will become elderly in the next 20+ years. Part of the planning includes anticipation of the facilities and services necessary to support interment and inurnment of family members in the future. The certitude of the need for these facilities cannot be ignored.

The Petitioner has concluded through the Environmental Impact Statement (EIS) analysis that the project development program will be modified, and the 20-lot residential subdivision and the Lipalu Street extension to service these lots will be abandoned. Therefore, there are expected to be no impacts from traffic through your immediate neighborhood. Likewise, impacts to public facilities are expected to be minimal. Use of energy-efficient lighting will be employed whenever possible, but the project is not expected to require much lighting, either indoor or outdoor. The mausoleums will be outdoor structures, and the proposed restroom will have a skylight so that no electrical lighting is required. Since the cemetery closes at dusk, the only lighting necessary will be for limited security lighting, which if utilized, will be energy efficient.

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Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

With a base in Texas, you may not recognize the great need and value of Hawaii's land conservation program. Our resources are finite. Regulation is vital for the essentials of water and energy as this State population grows. The stress on traffic and public facilities is already a critical strain on this Island.

Conservation means much more than what you see. Water supply, sources and distribution are vital. There are far better sites for houses.

Do what you wish with the acreage you already control. Please abandon the housing project on the conservation land Mahinui hillside with remnants of Hawaii's past, and centuries of old growth that support its birds and small creatures to maintain nature's pattern.

Sincerely, *Virginia S. Naquin*  
Virginia S. Naquin

45-090 Namoku St.  
Kāne'ohe, HI 96744

Sincerely,

Name: *Virginia S. Naquin*

Address: \_\_\_\_\_

City, State, Zip \_\_\_\_\_

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

July 16, 2008

There will be no need for new potable water sources for the project, as the project will be a cemetery expansion only. The water need for non-potable irrigation water still exists, and options for irrigation water are discussed in the Draft EIS in Section 6.2.2.

Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

2. There are far better sites for houses. Do what you wish with the acreage you already control. Please abandon the housing project on the conservation land Mahinui hillsides with remnants of Hawaii's past, and centuries of old growth that support its birds and small creatures to maintain nature's pattern.

Response: We note your opposition to the Proposed Action. As noted above, the project will not include the residential portion.

We would like to clear up a misconception you have concerning the vegetation found on the project site. Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants, and the vegetation found on-site is not considered "old-growth". The trees are not native, they grow quickly as most invasive species do. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area.

As noted in the EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. In this context, the project will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewate Heiau, and several large communities of Iaua'e fern, which are gathered by local hula.

As discussed in Section 4.8 of the EIS, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kofoea*, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Almakihi*, *Pueo*, and any of the alien bird species typically found in Windward O'ahu. At full build out of the project, 51.7 acres (91.5%) of the Petition Area will remain in open space.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*As a past honoree & resident living adjacent to H.M. for over 61 years, I adamantly protest & object to your proposal to change our "land use" and "beyond your boundaries" to develop & use our precious land only for the greed & financial gain of your developers & developers.*

*Honolulu does not need further development. We are saturated with homes, cars, pollution — you name it! We Hawaiian Memorial in such financial distress that the above proposal is forthcoming? Please reply,*

Sincerely,

Name: Virginia Jordan  
Address: 451 CPD Lane, Apt 805  
City, State, Zip: Honolulu, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Virginia Jordan  
45-090 Namoku St. Apt. 805  
Kāne'ōhe, HI 96744

Dear Ms. Jordan:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Protest and object to project.

Response: We note your opposition to the Proposed Action.

2. Kāne'ōhe does not need further development. We are saturated with homes, cars and pollution.

Response: Hawaiian Memorial Park (HMP) has decided to modify the project development program and will eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. Consequently, there are expected to be no impacts from traffic associated with the cemetery expansion in your neighborhood.

3. Is Hawaiian Memorial Park in such financial distress that they must do the project?

Response: As discussed in Section 1.8 of the Environmental Impact Statement (EIS), the Need for Action, HMP anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial services in Hawai'i is a very real community service, and is in fact rising. Hawai'i's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial and with the expected increase in numbers of burials associated with Hawai'i's aging



Ms. Virginia Jordan  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawaii, and will have significantly constrained inventory resources over the next five years. In order to continue to provide this service to the community, HMP must expand its ability to accommodate both casketed burials and niches.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I feel that they really should not extend land to build the cemetery bigger, because I know that I wouldn't want my children not to be able to see the mountains or the beautiful green land. Also it would be terrible when there are storms with heavy rains. Everywhere would be flooded more. So it would be destroying the homes of many people so please, do not extend the memorial people

Sincerely,

Name: Kimberly Imamura Kaneohe Elementary 5<sup>th</sup> grader  
Address: 4535 Nakuia St. 11 years old

City, State, Zip Kaneohe Hawaii 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Kimberly Imamura  
45-335 Nakulua St.  
Kāne'ohe, HI 96744

Dear Ms. Imamura:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I feel that they really should not build the cemetery bigger.

Response: We note your opposition to the Proposed Action. As discussed in the Environmental Impact Statement (EIS), Section 1.8, the Need for Action, Hawaiian Memorial Park (HMP) anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial space in Hawaii is a very real community requirement, and is in fact increasing. Hawaii's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial and with the expected increase in numbers of burials associated with Hawaii's aging population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawaii, and will have significantly constrained inventory resources over the next five years. In order to continue to provide this service to the community, HMP must expand its ability to accommodate both casketed burials and niches.

2. I want my children to be able to see the mountains and beautiful green land.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS,



Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

As discussed in Section 4.7 of the EIS, Flora, the proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

3. Concern about storms and heavy rains and flooding destroying homes.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event,

Ms. Kimberly Imamura  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 3

and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwa Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am very concerned about changing conservation land to any other use. Conservation land protects the beauty of our island. The beautiful views are shared by all. Changing the landscape, taking away part of the mountain and putting in any structures weakens its purpose. Conservation land should not be shipped away. Land should stay conservation.*

Sincerely,  
*Jane H. Breed*

Name: Jane H. Breed

Address: 45-090-K Nanoku #4

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Irene H. Breed  
45-090-K Namoku St.  
Kāne'ohe, HI 96744



Dear Ms. Breed:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned about changing conservation land to any other use. Conservation land should stay conservation.  
Response: The land use district designations are not cast in stone. Hawai'i Administrative Rules Title 15 Chapter 15, Land Use Commission Rules, lays out the requirements for how to petition the Land Use Commission for a boundary amendment. Over time, uses for land change to accommodate community services.
2. I am concerned about changing our view that is shared by all.

Response: As discussed in the Draft Environmental Impact Statement (EIS), Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

Ms. Irene Breed  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Robin Okubo  
45-090 Namoku St. #1106  
Kāne'ohe, HI 96744

Dear Robin Okubo:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. What do you plan to do to protect and preserve the project area; nature needs to be preserved.

Response: An Environmental Impact Statement (EIS) is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. The Petitioner will follow all mitigation measures to ensure there is no overall significant impact associated with the project. Some specific actions include: revegetation of 11.4 acres with native and indigenous plants; changing the development program to create a 9.4-acre cultural preserve for historic sites and laua'e fern; and planting of over 300 new trees on the new cemetery area. Hawaiian Memorial Park has a vested interest in creating and maintaining a pleasing and peaceful environment.

2. Against project.

Response: We note your opposition to the Proposed Action.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

DO WHATEVER IS NECESSARY TO PRESERVE  
HAWAIIAN IN KANEHOE FOR FUTURE GENERATIONS!  
BEAUTIFUL! WHAT DO YOU PLAN TO DO TO PROTECT PRESERVE  
THE MOST BEAUTIFUL AREA ON OAHU? PLEASE DO NOT PUT  
"PROFIT" + JES FIRST. DO THE RIGHT THING FOR  
KANEHOE RESIDENTS NOW + FOR THE FUTURE!  
WE HAVE GLOBAL WARMING NOW TO CONTEND  
WITH - PRESERVE NATURE, NOT DESTROY  
THIS BEAUTIFUL AREA!  
I HAVE LIVED IN MANY PARTS OF THE WORLD  
AND HAWAII, KANEHOE IS PARADISE! DO YOUR  
BEST + DO THE RIGHT THING - KEEP KANEHOE  
COUNTRY! LET US KNOW YOUR HONEST AND  
SINCERE FEELINGS!  
Sincerely,  
Robin Okubo

Name: Robin Okubo

Address: 45-090 NAMOKU ST #1106

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Robin Okubo  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I wish to live here without  
altering the environment - I wish to  
retain the peaceful beauty above all.*

Sincerely,

Name: Helbert Hastert  
Address: 45-010 Nalani St  
City, State, Zip Kaneohe, Hawaii 96844

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Eleanor Nagamoto  
45-090 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Nagamoto:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008. We note that you have no comments related to the Proposed Action. Nevertheless, your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*Polani Nani was built approximately  
44 years ago as a quiet and secure  
community for Senior Citizens to  
live and their final years a  
successful and beautiful atmosphere.  
I had your project will be destroyed  
justifying a housing, area conservation  
land???*

Sincerely,

Name: *April S. Colon*

Address: *Namoku St*

City, State, Zip *Kaneohe, HI 96744*

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners





Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Muriel E. Coleman  
45-090 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Coleman:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project will destroy the peaceful and beautiful atmosphere of Pohai Nani.

Response: In terms of proximity to Pohai Nani, we can report that Hawaiian Memorial Park (HMP) has decided to modify the development program by eliminating the 20-lot residential subdivision and the Lipalu Street extension. The plan has also been modified by adding a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The cultural preserve will remain in its current "natural" state, except for a modest access road. The overall site will also be buffered from existing residents by a minimum 50-foot area that will remain in the existing vegetation, and a further transition zone to be revegetated with native and indigenous species.

Overall, the appearance of the cemetery will be of green open space with a bounty of trees (over 300 new trees on the cemetery proper) and other "natural" areas left intact. In total, only 4.8 acres of the proposed cemetery will be "developed" with roads (4.5 acres) or buildings (0.3 acres). These physical qualities and the quiet ambience of the cemetery should have minimal impact on Pohai Nani. We also note that the area closest to Pohai Nani is in Phase 3 of the expansion program, and may not occur for ±10 years after land use approvals are obtained.

Ms. Muriel Coleman  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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2. How do you justify a housing area on conservation land

Response: All landowners have the privilege of considering appropriate alternative uses for their property subject to the required land use approval process. It was appropriate for Hawaiian Memorial Park (HMP) to consider a consistent and modest extension of the existing residential land use surrounding its property. As you know, there are significant entitlement and development costs associated with this process. The opportunity to obtain a near term revenue source to help defray those costs is important to HMP. Nevertheless, as described in #1 above, the residential portion of the Proposed Action will not be built.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

7-11-08  
my concern is the problem with erosion & storm runoff. Also there is the problem flooding. It is wrong to destroy the beautiful forest behind the cemetery + behind

Pohai Nani  
I would like to add that loss of the forest area will contribute to flooding. *Allen Breed*

P.S. Pohai Nani means "Surrounded by Beauty".

Sincerely,

Name: Allen Breed  
Address: 45090 Namokust Apt K  
City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

7-15-08  
Have you taken into consideration how this project will impact on the ~~suburbs~~ pollution of Kaneohe Bay.

This will increase the runoff that already is carrying chemicals to Kaura Stream. i.e. the increase in fertilizers.  
also there is more runoff ~~also~~ lots more, with the grass you will plant than there ever was with the trees (which will be cut).

Sincerely,

Name: Allen E. Breed  
Address: 45090 Namokust, Apt K  
City, State, Zip Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Allen Breed  
45-090 Namoku St. Apt. K  
Kāne'ohe, HI 96744

Dear Mr. Breed:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letters dated July 11, 2008 and July 15, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in both your letters, followed by our response:

1. My concern is the problem with erosion and storm runoff.

Response: As discussed in detail in Section 4.3.3 of the Draft Environmental Impact Statement (EIS), temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

Mr. Allen Breed  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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Retention areas are the preferred method to control storm water runoff. Retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

2. Also there is the problem flooding. It is wrong to destroy the forest behind Pohai Nani. Loss of forest area will contribute to flooding.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events, as indicated in our answer to #1 above.

We would also like to let you know that HMP has modified the project development program with two important adjustments: (1) the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots will be eliminated; and (2) creation of a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa ewa e Heiau, as well as large areas where the laua e fern is plentiful. This cultural preserve will remain intact, in its "natural" state except for a modest access road. This means that only 4.8 acres (8.5%) of the 56.5-acre Petition Area will be converted to impervious surface. The remaining 51.7 acres will remain in open space, in a combination of turf/trees and revegetated and existing forest.

3. Projects impacts on pollution to Kāne'ohe Bay.

Response: The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

4. Runoff to Kawa Stream especially increase in fertilizers.

Response: HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

The turf areas are treated with slow release turf fertilizers twice a year; in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. Impacts on groundwater are expected to be minimal. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to University of Hawaii's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application. Finally, the retention areas discussed above will function to filter Nitrogen and Phosphorous before it leaches.

5. More runoff with grass than with trees.

Response: Runoff is affected by the ability of the ground surface and soils to absorb rainfall and have this moisture percolate through the soils. Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu Department of Planning and Permitting's Rules Relating to Storm Drainage Standards of January 2000.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Hana Fries  
45-090 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Fries:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I feel the project is completely disruptive to the whole community- in every way, water, trees, animals, etc.

Response: The intent of an Environmental Impact Statement (EIS) is to disclose the anticipated impacts of the Proposed Action, and to offer mitigation for those items where significant impact is anticipated. We believe we have disclosed and mitigated for any impacts that might be associated with the project.

Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the Draft EIS, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

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Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I attended a meeting of the  
K. J. C. regarding the expansion and  
feel it is completely disruptive to  
the whole community - in every way -  
water, trees, animals, etc.*

Sincerely,

Name: Hana Fries  
Address: 45-090 Namoku St.  
City, State, Zip: Kaunohelo Hawaii 96713-96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Ms. Hana Fryes  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

As discussed in Section 4.8 of the EIS, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pūeo, and any of the alien bird species typically found in Windward O'ahu.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Keva ditch was in construction for the past year and a half. The construction noise each morning was more than I could bear. Please no more construction in our well contained small neighborhood.

Along Mahulehu, traffic is getting bad. I don't need more traffic congestion.

I wake up each morning and see the beautiful mountains. I don't want to wake up to see a mess at least not in my backyard.

Timber year development? Way to long, that is. If everything is approved, which I hope will not.

Sincerely,  
Leslie Tom

Name: LESLIE TOM

Address: 45-323 Lehuula St

City, State, Zip Kaneohe, HI 96744-2322

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Leslie Tom  
45-323 Lehuuila St.  
Kāne'ohe, HI 96744



Dear Ms. Tom:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Kawa ditch was in construction for the past year and a half. The construction noise each morning was more than I could bear. Please no more construction.

Response: We note your opposition to the Proposed Action.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final Environmental Impact Statement (EIS), and summarized below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

2. Traffic is bad along Mokulele.

Response: As discussed in detail in Section 6.1 of the Draft EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In regard to traffic on Mokulele, the Petitioner has decided to eliminate the 20-lot residential subdivision and the Lipalu Street extension from the development program. As a consequence, there are not expected to be any impacts from traffic through your immediate neighborhood.

3. I don't want to wake up to see a mausoleum, at least not in my backyard.

Response: Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape

with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Where the roots of the mausoleums are visible, they are a minor element of the viewshed. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.

4. 20 year development is too long.

Response: Development will not be occurring for 20 years non stop. The project is broken into three phases. Construction for phases will last approximately six months.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

First of all I am greatly concerned that there will be a tremendous loss of the forest and native Hawaiian plants that as well as exposure of the remains and any Hawaiian ancestor remains that may be there on the property. Secondly I am concerned about flooding due to storms that will only increase already exist and will increase with any compaction of the land by grading and by erosion. This has to be stopped!! It will affect all of us and our future generations.

Sincerely,



Name: Tina Makainai

Address: 45-213 Nokolui Pl

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners



October 8, 2008

Tina Makainai  
45-213 Nakulua Pl.  
Kāne'ohe, HI 96744

Dear Ms. Makainai:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am greatly concerned that there will be loss of forest and native Hawaiian plants and birds.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the Draft Environmental Impact Statement (EIS), Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second



growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pūeo, and any of the alien bird species typically found in Windward O'ahu.

2. Concern about exposure of the heiaus and any Hawaiian ancestor remains that may be on the property.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment (CIA) to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. To further this goal, the Petitioner has modified the Proposed Action by creating a 9.4-acre cultural preserve that will include five archaeological sites and large communities of *Iaua'e* fern for gathering purposes. This corridor will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

No human burials have been documented within the Petition Area, and CIA contributors did not specifically mention knowledge of *iwi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities.

3. I am concerned about flooding due to rainstorms that already exist and will increase with any grading, digging, and erosion.

Response: As discussed in detail in Section 6.4 of the EIS, retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

Prior to any ground disturbing activities, a grading and drainage plan will be reviewed by both the DPP and the State Department of Health and must include specific construction period and operational best management practices to prevent impacts related to erosion and flooding.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am against the expansion of Hawaiian Memorial Park, Petai Nani and the home they are planning to build for many reasons.

Hawaiian Memorial besides taking away a part of our Eo system. If you don't acquire this land how long before you abandon, bankrupt or just stop maintaining? When no more money can be made what will you do? Be honest. I have dealt with Hawaiian Memorial before and was pissed off with the answer I received. As far as I'm concerned you're out their just to make money off the dead.

As for Petai Nani if you ~~are~~ are only going to except the rich, no thank you. Will you except the poor? What percentage?

As for the home, for the rich, affordable? What do you consider affordable? I can't afford higher land taxes.

Sincerely,

Glen Maxwell

Name: Glen Maxwell

Address: 45-338 Mokulele Dr.

City, State, Zip Kaneohe, Hawaii 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Diane Maxwell  
45-338 Mokulele Dr.  
Kāne'ohe, HI 96744

Dear Ms. Maxwell:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am against the project.

Response: We note your opposition to the Proposed Action.

2. If you don't acquire this land, how long before you abandon, bankrupt or just stop maintaining?

Response: We believe you must misunderstand the project. The land is already owned by Hawaiian Memorial Life Plan, Ltd. and the Proposed Action is to reclassify approximately 56.5 acres of land from the State Land Use Conservation District to the Urban District to expand the acreage of the existing Hawaiian Memorial Park (HMP) Cemetery.

The existing HMP Cemetery will not be abandoned. If the project does not move forward, it will result in reduced supply and selection of interment choices available to the general public. This means that Hawai'i families will have to find alternative locations to inter loved ones and assumes that there is other space available for cemetery use elsewhere on O'ahu, or that other cemeteries will be developed in other locations. If burial space is developed elsewhere on O'ahu to accommodate projected demand, potential impacts similar to those anticipated as a result of the Proposed Action will be expected at other sites.

Ms. Diane Maxwell  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

3. Homes will be only for the rich or affordable; what do you consider affordable? Can't afford higher land taxes.

Response: We would like to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots.

Also, the project is not expected to affect property taxes for the surrounding neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Capt. Lawrence K.W. Smith III  
45-206 Namoku St.  
Kāne'ohe, HI 96744

Dear Capt. Smith:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We are very fortunate to have a beautiful, serene place like Hawaiian Memorial.  
Response: Thank you for recognizing the beauty and serenity of the existing Hawaiian Memorial Park (HMP).
2. Conservation Land is that way for a reason.

Response: The State Land Use Commission, pursuant to Chapter 205, Hawai'i Revised Statutes, has classified all lands in the State of Hawai'i into one of four land use districts: (1) Conservation; (2) Agricultural; (3) Urban; and (4) Rural. These designations were part of the process that created the State Land Use Commission, and their classification of all land in Hawai'i in 1969. There is no record of specific reasons that the Petition Area was initially designated as Conservation Land. It is probable that a large factor affecting its designation was the fact that the property was a large tract of open space.

Land use is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other.

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford: ITS VERY DIS-HEARTENING THAT A SENSITIVE SUBJECT LIKE THE PARKING AND CARE OF SOMEONES REMAINS CAN BRING ABOUT SUCH AN-ADVERSE RESPONSE FROM A TIGHT-KNIT COMMUNITY. WE ARE VERY FORTUNATE TO HAVE A BEAUTIFUL, SERENE PLACE LIKE HAWAIIAN MEMORIAL. BUT LETS KEEP IN MIND THAT WITH THAT SERENITY AND ITS PRE-PLANNED LINES WERE DRAWN IN THE SAND THAT YOU CANNOT CROSS. CONSERVATION LAND IS THAT WAY FOR A REASON. THE SUBJECT MATTER THAT IS PRESENTED BY THE TEXAS COMPANY SHOWS BLATANTLY AND CLEARLY A DISREGARD FOR OUR NEIGHBORHOOD. IVE WORKED IN THE MACHINE INDUSTRY FOR 30+ YEARS. ~~THE~~ DEGRADATION OF LAND AND SEA "COMES ON DAY, WHO RE-THINK THIS."

Sincerely,

*Lawrence K.W. Smith III*

Name: LAWRENCE K.W. SMITH III

Address: 45-206 NAMOKU ST.

City, State, Zip KANE'OEHE / HI. 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

3. EIS shows disregard for our neighborhood.

Response: We do not believe we have shown disregard for the surrounding neighborhood. As discussed in Section 11.2 of the Environmental Impact Statement (EIS), the applicant has participated in several types of community outreach and meetings. In January 2007, the applicant distributed letters to over 250 residents living within 300 feet of the Petition Area and to other residents in the region to invite them to attend community outreach meetings held in January and February of 2007. The applicant made a presentation at these meetings in an effort to communicate directly with HMP's neighbors and community leaders about the long-term master plan for the cemetery. The meetings gave attendees the opportunity to view the proposed plan and ask questions about the project in the context of the actual site. Additionally, the meetings provided the opportunity to receive input from the community regarding the cemetery's early planning processes and to establish contact persons for subsequent points during the project's duration. In July 2007, a facilitated meeting was held to address any additional concerns related to the project. This meeting was attended by the Petitioner, the preparer of this Draft EIS, and a community group (Hui O Pikoiloa) representative as well as nearly 200 other attendants.

Beginning in March 2007, project representatives appeared before the Kaneohe Neighborhood Board (No. 30) to answer questions that had been raised as a result of the community meetings hosted by the applicant in January and February 2007. On a monthly basis, as necessary, project representatives have attended neighborhood board meetings to keep the board informed about the progress of the project. In addition, a sub-committee has been created specifically for the HMP Expansion project, and project representatives have given presentations at and attended these monthly meetings.

During the community outreach, community members have raised questions on a variety of subject areas, including: viewplanes; flooding; traffic impacts; security; potable water sources; historic and cultural resources; and project alternatives. The EIS is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment. This includes all of the concerns that community members have raised during the meetings.

In large measure, feedback from the community has resulted in two significant changes to the project development program that will appear in the Final EIS: (1) elimination of the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots; (2) creation of a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau, as well as large areas where the laua'e fern is found.

4. There is a direct correlation between the influx of degradation of land and sea.

Response: We agree that activities occurring on the land can impact the sea. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kawa Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawa Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

WE ARE TODAY AGAINST THE  
HAWAIIAN MEMORIAL DUE TO THE INCREASED  
FLOODING + LAND EROSION IT WILL  
CAUSE. GO BACK TO TEXAS  
THEY GOT HOTS OF LAND THERE.

Sincerely,



Name:

Ty L. Hooper

Address:

45-158 NAMOKU ST.

City, State, Zip

DANVILLE, HI, 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Ty Hooper  
45-158 Namoku St.  
Kāne'ohe, HI 96744

Dear Mr. Hooper

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Against project due to the increase in flooding and land erosion it will cause.

Response: As discussed in detail in Section 6.4 of the Draft Environmental Impact Statement, (EIS), retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The drainage plan will be designed to these standards which apply to all new development on O'ahu.

As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion

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Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Mr. Ty Hooper  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*'O Kānōi na Kāūmealani lāua 'o Kāmōā au. He 'ēhua  
ā'u kēiki a nōho mākei mākou me Kāwē'ōhe. He wahi pāne  
ka wahi āu e noho'ō nei e 'ālai ai. He pono iā e mālama  
a waiho pono iā mā heiau a me he wahi nōho nūe iā e  
nā kapane o ke au i hola.*

*I am extremely concern with the destruction of the heia  
and other culturally significant sites. Heiau are extremely sacred  
to our native people and should be preserved for the generations  
to come. Furthermore, the proposed plan will negatively impact  
the iwi that will most likely be found on the land. As a  
corporation dealing with human burial and re-entrance, I know  
you understand the humanity issue that must be afforded  
to the ancient sites and the remains that rest there.*

Sincerely,

Name: Kānōi Walk

Address: 45-359 Nakulu'āi St.

City, State, Zip Kāwē'ōhe, Hawaii 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Kānōi Walk  
45-359 Nakulu'āi St.  
Kāwē'ōhe, HI 96744

Dear Mr. Walk:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāwē'ōhe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am extremely concerned with the destruction of the heiau and other culturally significant sites.

Response: It is unfortunate that you are under the misconception that Kawa'ewa'e Heiau will be destroyed. It is the intent of the project to protect and preserve the significant historical sites found in and near the Petition Area. As noted in the Draft Environmental Impact Statement (EIS), the Hawaiian Memorial Park (HMP) will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, HMP has modified the development program and will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of the Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

2. The proposed plan will negatively impact the iwi that will most likely be found on the land.

Response: We would like to point out that no human burials have been documented within the Petition Area, and Cultural Impact Assessment



Mr. Kananōi Walk  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

contributors did not specifically mention knowledge of *iwi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any inadvertent cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. A cultural and archaeological monitor will observe all grading and excavation activities to provide verification that cultural and archaeological finds have been protected.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*Hawaiian Memorial Park expansion will increase  
the traffic on Obola st. and removing the forest  
behind my house on Ohaha Pl. will eliminate  
the habitat for the beautiful singing kama hou  
On moon lit nights I can see the pueo and  
flying to the trees behind my house. You expansion  
will take away the things that make Kama Hou special.*

Sincerely, Jesse Davis

Name: JESSE DAVIS

Address: 45-173 OHAHA PL

City, State, Zip KAAIHOHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Jesse Reavis  
45-173 Ohaha Pl.  
Kāne'ohe, HI 96744

Dear Mr. Reavis:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project will increase traffic on Ohaha Street.

Response: We would like to inform you that Hawaiian Memorial Park (HMP) has decided to modify the project development program and will eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

2. Removing the forest will eliminate habitat for birds and pueo.

Response: As discussed in Section 4.8 of the Environmental Impact Statement (EIS), Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area.

Also as noted in Section 4.8, the short-eared Owl or *Pueo* (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible *Pueo* could occasionally forage in the area as it forages in grasslands,

Mr. Jesse Reavis  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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agricultural fields, and pastures as well as in upland forested habitat. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, *Pueo*, and any of the alien bird species typically found in Windward O'ahu. There is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few *Pueo* that still exist on O'ahu would require. In addition, the proposed landscape plan calls for over 300 new trees to be planted on the new cemetery area. Further, HMP has decided to modify the project in a second important manner; a 9.4-acre cultural preserve will be created that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau and areas where the laua'e fern is plentiful. All told, 51.7 acres (91.5%) of the 56.5-acre Petition Area will be left in open space

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Gary Reavis  
46-318 Haiku Rd. #3  
Kāne'ohe, HI 96744

Dear Mr. Reavis:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned of possibility of storm runoff and erosion.

Response: As discussed in Section 4.6 of the Draft Environmental Impact Statement (EIS), retention areas are the preferred method to control storm water runoff. The retention areas hold storm water and will allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned of possibility storm run off & Erosion,  
And the loss of the forest. What about pollution in Kaweowe Bay.  
Less forest mean more noise, Pikoiloa doesn't need more  
traffic.*

Sincerely,

*Gary Reavis*

Name: Gary Reavis

Address: 46-318 HAIKU RD #3

City, State, Zip KAWEOHE HI. 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

2. Loss of forest.

Response: As discussed in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. To replace the non-native forest, the cemetery area will be landscaped with turf, and 11.4 acres will be revegetated with site-appropriate native and Polynesian-introduced plants. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will be supplemented with in hundreds of new trees, which should create a better landscape appearance for the expansion area. We would also like to point out that Hawaiian Memorial Park (HMP) has modified the development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The preserve will remain intact in its "natural" state except for a modest access road.

3. Pollution to Kāne'ōhe Bay.

Response: The method of retention areas for storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus(TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. Because no additional runoff will enter Kāwā Stream, this equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne'ōhe Bay. No one has a greater vested interest in the proper design and

maintenance of these retention areas than HMP; both for appearance and water quality issues.

4. Less forest means more noise.

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and are summarized in the following paragraphs.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

5. Pikoioa doesn't need more traffic.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The

Mr. Gary Reavis  
Hawaiian Memorial Park Cemetery Expansion Project  
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October 8, 2008  
Page 4

LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, HMP will modify the development program for the project in another way by eliminating the 20-lot residential subdivision and the Lipalu Street extension which was to service the residential lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am concerned with the loss of our wild life and our Hawaiian remains. I am also worried with the increase of traffic on the Waialeale road to visit my family. How will you as a local be able to destroy land that could educate our keiki and future generations to come? How will you replace vegetation that has been growing for centuries? Even with the replacement of greenery it will never be the same as the original land. It will never be the same for the creatures that were here before us. And by destroying Hawaiian remains ~~we~~ you think are insignificant you will be destroying apart of history.

Sincerely,



Name: Gene Williams

Address: 150 Hamakua St. #720

City, State, Zip: Kailua, HI, 96734

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

October 8, 2008

Gena Williams  
150 Hamakua St. #720  
Kailua, HI 96734

Dear Ms. Williams:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned with the loss of wildlife.

Response: As discussed in Section 4.8 of the Draft Environmental Impact Statement (EIS), Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kōlea*, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *Oʻahu* 'Amakihi, *Pueo*, and any of the alien bird species typically found in Windward Oʻahu. In addition, 300 new trees are proposed as part of the landscape plan for the project, which will provide additional habitat. And finally, Hawaiian Memorial Park (HMP) has decided to modify the development program by establishing a 9.4-acre cultural preserve east of Kawaʻewaʻe Heiau. This cultural preserve will also include significant areas where the *lauae* fern is found, to provide future supply for those who gather this plant.



2. I am concerned with loss of Hawaiian remains.

Response: We would like to point out that no human burials have been documented within the Petition Area, and Cultural Impact Assessment contributors did not specifically mention knowledge of *ivi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any inadvertent cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. A cultural and archaeological monitor will observe all grading and excavation activities to provide verification that cultural and archaeological finds have been protected.

3. I am worried about the increase in traffic.

Response: Although cemeteries typically have long usage periods of 40 to 50 years, overall visitor traffic generally remains stable over time because the frequency of visits by family or friends to a deceased's grave site or columbarium niche decline over the years as family members grow older or move away. As new areas of a cemetery are opened for new burials or columbarium buildings, visitor traffic shifts to the newer areas of the cemetery and visitor traffic slowly declines in the older areas of the cemetery.

As discussed in detail in Section 6.1 of the Draft EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions are expected to be the same in the future with or without the project.

We would also like to let you know that HMP has modified the development program in another important manner by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service the subdivision. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

4. How will you replace vegetation that has been growing for centuries?

Response: We would like to clear up a misconception you have concerning the vegetation found on the Project Site. Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants and has not been growing for centuries. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Vegetation that had been growing for centuries in Hawaii would consist of large koa and *ohi'a lehua* trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am greatly concerned about your desire to expand your cemetery to the Petii Koni Retreat home in Kaula.

I live just below Petii Koni on Niihau Plateau and have lived here for 42 years. I love the beauty of this area and I definitely would not like to see a cemetery or more homes on our beautiful green mountainside. Your project was a great idea but as the following:

1. Erosion of runoff + possible flooding
2. Quality of our ground water + streams from insecticides
3. Impact on ground water + streams from insecticides
4. Burial of water and native Hawaiian heilige
5. Just don't want to see a cemetery or more homes on this area

Please leave our beautiful Kaula as it is now.

Name: Mary Ann

Address: 45-241 Hikiwale Place

City, State, Zip Kaneohe, HI 96746

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Myrina Arume  
45-241 Hikiwale Pl.  
Kāne'ohe, HI 96744

Dear Ms. Arume:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I love the beauty of the area and would not like to see a cemetery or more homes on our beautiful green mountainside.

Response: The impacts on view planes from the project are described in Section 4.10 of the Draft Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. We would like to point out that Hawaiian Memorial Park (HMP) has modified the project development program in two significant ways that will affect views of the property: (1) the 20-lot residential subdivision has been deleted from the development program; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'ewa e Heiau.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. Overall, no views of any mountains or ridges will be obstructed by the project.



2. Concerns of erosion and runoff and possible flooding.

Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

Retention areas are the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kawa Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawa Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

Final drainage and grading plans must be reviewed and approved by the City and County of Honolulu Department of Planning and Permitting and the State Department of Health.



3. Quality of groundwater from decaying bodies.

Response: There is no evidence that Hawaiian Memorial Park (HMP) has contributed to groundwater problems or that the natural decomposition of casketed interments has or will have any impact on groundwater resources. Formaldehyde is one of the most common chemicals used in America for an incredible number of products and materials (most commonly furniture manufacture). Its use in modern embalming methods is in very small diluted quantities. It is a biodegradable organic compound which decomposes when exposed. It is important to remember that every non cremated interment is placed in a casket and a concrete outer burial container with a sealed top or lid to allow a stable burial environment both for compaction of the soil around the grave and for exposure to the elements.

4. Impact on groundwater and streams from insecticides and pesticides.

Response: HMP will work to ensure groundwater impacts are minimized. HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides and herbicides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

The turf areas are treated with slow release turf fertilizers twice a year; in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. Impacts on groundwater are expected to be minimal. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to UH's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application.

Also please refer to the answer to Question #2 above for discussion of retention areas and impacts to streams.

5. Interfering with native Hawaiian heiau.

Response: As noted in the Draft EIS, HMP will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the historic sites in the vicinity of the Kawa'ewa'e Heiau are part of a complex of cultural sites. As mentioned in #1 above, HMP will create a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites. HMP supports the long-range protection of Kawa'ewa'e Heiau and looks forward to completing discussions with groups responsible for its care.

6. Do not want to see a cemetery or more homes in this area.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Dudley Dias  
45-473 Lipalu St.  
Kāne'ohe, HI 96744

Dear Mr. Dias:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Hawaiian culture has suffered due to development. There are too many Hawaiian cultural sites on this given location to isolate them individually to protect them properly they need to be seen as a whole unit within the natural setting of the existing environment.

Response: The statements about these sites being part of a whole complex are well taken. As noted in the Draft Environmental Impact Statement (EIS), the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, Hawaiian Memorial Park (HMP) has modified the development program with the establishment of a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. No development, except for a modest access road, will occur in this area. This culture preserve will also include significant areas where the laua e fern is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

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Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Hawaiian culture has suffered due to development and the plans to UP grade this country will only further the devastation of the existing Hawaiian history what little there is left: example H-3 Facility. There are too many Hawaiian cultural sites on the given location to isolate them individually to protect them properly is to encompass them as one whole with within the natural setting of the existing environment. I wonder if the many Hawaiian group out there know the devastation which is about to happen to their culture. P.S. Activists do Vote

Sincerely,

Dudley Dias

Name: Dudley Dias  
Address: 45-473 Lipalu St  
City, State, Zip Kaunohi Kāne'ohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

2. Do the Hawaiian groups out there know about the plans of the project

Response: In order to address the effects the proposed development activity may have on Native Hawaiian practices, culture, and traditions, a Cultural Impact Assessment (CIA) was prepared for the Hawaiian Memorial Park Expansion Area in 2008. The study findings are summarized in Section 5.5 of the Draft EIS and the full report is included as Appendix G. The purpose of the CIA was to evaluate potential impacts to cultural practices as a result of the Proposed Action. Methods for the report included research of historical documents, maps and existing archaeological information, in addition to community consultations and "talk-story" sessions with people who have knowledge of the Kane one *ahupua'a*.

During preparation of the CIA, efforts were made to contact Hawaiian cultural organizations, government agencies, and individuals who might have knowledge of or concerns about traditional cultural practices specifically related to the Petition Area. Names of potential community contacts came from the State Historic Preservation Division, Office of Hawaiian Affairs, O'ahu Island Burial Council, and members of the community organizations who maintain the Kawai'ewa e Heiau. In the conduct of the CIA, 32 individuals were contacted as possible leads, 27 people responded and 10 *kūpuna* and/or *kama'āina* were interviewed for more in-depth contributions. A list of individuals consulted, their affiliations, and comments is found in the full CIA report (Appendix G).

HMP is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division. HMP will follow the mitigation measures as recommended by the CIA to address potential adverse impacts of the Proposed Action on Hawaiian cultural beliefs, practices, and resources.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Susan McBride  
45-487 Lipalu St.  
Kāne'ohe, HI 96744

Dear Ms. McBride:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned with the additional traffic coming up and down Lipalu St.  
Response: In regard to traffic, Hawaiian Memorial Park (HMP) has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that would have serviced these lots. Consequently, there will be no traffic impacts on Lipalu Street.
2. Concerned about the ability for people to come down from the cemetery and easily be able to break into the houses backing the area.  
Response: According to the Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned with the additional traffic coming up & down Lipalu St.*

*Also the ability for people to come down from the cemetery & easily be able to break into the houses backing the area.*

*Just in all destroying a beautiful peaceful tranquil area - that is anawahi land*

Sincerely,

Name: Susan C. McBride

Address: 45-487 Lipalu St

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

3. Destroying a beautiful peaceful tranquil area that is conservation land.

Response: We note your opposition to the Proposed Action. We believe that the tranquility of the area will continue, as cemeteries are peaceful open spaces. Additionally, the proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the existing residential uses will keep the sense of open space and lush vegetation. Landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the cemetery expansion area.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

CONCERNED WITH THEIR RUNNING -  
TO LOWER HOMES THAT ARE EXISTING -  
ALSO TRAFFIC THROUGH EXISTING -  
NEIGHBORHOODS.

Sincerely,

Name: GARRETT STORIER  
Address: 415-480 LIPALU ST.  
City, State, Zip FAHY FOLLE HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Gregg Stoyer  
45-487 Lipalu St.  
Kāne'ohe, HI 96744

Dear Mr. Stoyer:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about the water runoff to lower homes that are existing.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. As discussed in Section 6.4 of the Environmental Impact Statement (EIS), retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

2. Concerned about traffic through existing neighborhood.

Response: We would like to let you know that Hawaiian Memorial Park

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Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Mr. Gregg Stoyer  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service the subdivision. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Margaret Silva  
45-201 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Silva:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My concern is traffic which is really bad now.

Response: As discussed in detail in Section 6.1 of the Environmental Impact Statement (EIS), Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, we want you to know that Hawaiian Memorial Park (HMP) has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

2. Flooding.

Response: As discussed in Section 6.4 of the EIS, retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates.

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July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am very concerned about this development. My concern is traffic which is really bad now. also flooding. We have had flooding in the past. Its really sad. I think that our forest will be gone. And what about all the birds in the area. This is just the tip of the ice berg. Please don't ruin our mountains!*

Sincerely,

*Margaret Silva*

Name: Margaret Silva

Address: 45-201 Namoku St

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

3. Loss of forest.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area. Finally, HMP will modify the development program in another way by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The cultural preserve will be left in its current "natural" condition except for a modest access road.

4. Loss of birds.

Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of

concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation of 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pūeo, and any of the alien bird species typically found in Windward O'ahu.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTER & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Melva Kujubu  
45-486 Lipalu Pl.  
Kāne'ohe, HI 96744

Dear Ms. Kujubu:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Construction traffic on Lipalu St. will be unbearable and will ruin the street.  
Response: There are expected to be no impacts from traffic through your immediate neighborhood, as the Petitioner has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension.
2. Concern about dust.  
Response: Impacts from dust will be minimized by using several Best Management Practices such as watering, mulching, and temporary vegetation.
3. The forest cools the area and the serenity of the mountain is priceless.  
Response: The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed cemetery expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I live on Lipalu St. If it is going to take a short period to develop (20 yrs +?) the construction traffic on Lipalu will be so unbearable and dust affecting people with a chronic. Besides this, the construction equipment going up + down will damage our street. We love the forest as it cools the area and the serenity of the mountain is priceless.*

*Please keep the area safe for me and future generations to come.*

Sincerely,

*Melva Kujubu*

Name: Melva Kujubu  
Address: 45-486 Lipalu St  
City, State, Zip: Kaunohae HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

groupings of trees.

Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

The area will continue to have a serene lush appearance. The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

Another modification to the development program is the creation of a 9.4-acre cultural preserve east of Kawaewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

4. Please keep the area as it is.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I have been living in the  
Pikoi loa area since 1964.  
I chose this area because  
of the lush green hillside  
in the back of my home.  
Please do not destroy what  
I have enjoyed all these years.  
I would like to continue to  
enjoy it for a very long time*

Sincerely,

Name: J Yazaki  
Address: 45-174 Lipalu Pl  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

J. Yazaki  
45-174 Lipalu Pl,  
Kāne'ohe, HI 96744

Dear J. Yazaki:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I chose this area to live because of the lush green hillside in the back of my home. Please do not destroy what I have enjoyed all these years.  
Response: As described in the Draft Environmental Impact Statement (EIS), the proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in the Draft EIS, Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, and as a result of many comment letters we received during the public review period for the EIS, the project development program has been modified. The 20-foot residential subdivision and the Lipalu Street extension have been deleted from the development program and the Cemetery Only alternative has

been selected as the development to be considered by the State Land Use Commission. For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am thoroughly against the plans to develop our neighborhood into homes, etc. I would not enjoy the noise, loss of "country-like living, etc. I really did not the ideal(s) presented to us at our mtg - regarding the loss of forestry, our birds, plants - My children would not like to live here if this were the case for our buying - This home 45 years ago. Our home - at the present time - has a beautiful view of the Koolau mountains and Kaneohe Bay - What will happen now!! Auwe!!

Sincerely,  
Malet Kaili

Name: Violet Kaili

Address: 45-175 Lipalu Place

City, State, Zip Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Violet Kaili  
45-175 Lipalu Pl,  
Kāne'ohe, HI 96744



Dear Ms. Kaili:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Against the plans of the project.  
Response: We note your opposition to the project.
2. Noise  
Response: A noise review for the Proposed Action was conducted in 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final Environmental Impact Statement (EIS), and are summarized below.

Their findings conclude that temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions."

3. Loss of forest, birds, and plants

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

Also, in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kolea*, who forage in grassy areas with a good insect supply. The revegetation of 11.4 acres of the Petition Area with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Winward O'ahu. In addition, the landscape design for the project calls for over 300 new trees on the property, which will provide additional habitat for birds.

4. Our home has beautiful views of the Ko'olau mountains and Kāne'ōhe Bay. What will happen now?

Response: We also would like to point out that the Petitioner has decided to eliminate the proposed 20-lot subdivision from the development program and replace it with additional area for cemetery expansion. The Petition will also set aside 9.4 contiguous acres of the Petition Area for a cultural preserve to protect archaeological sites and communities of fauā'ferm for gathering purposes. This area will remain intact and will not be developed except for a modest access road. A combination of these factors will combine to minimize visual impacts associated with the cemetery expansion.

Development of the Petition Area as a cemetery will not affect views of the Ko'olau Mountains or Kāne'ōhe Bay. The appearance of the Petition Area will change, but the perception of this change will vary depending on where you are. In general, short-range views of the Petition Area will be moderated and obscured by the presence of existing and proposed vegetative buffers, and the difference in topography between the Petition Area and adjacent residential neighborhoods.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have lived in Kāne'ōhe for over 50 years and have sadly seen the degradation done by developers. The Bay has been negatively impacted by run off from areas that have been graded and denuded of trees. There is no way you can alter the land and not impact underground water supplies and prevent above ground erosion. Other than land/water impact the visual impact of large mausoleums would be dreadful. Can you guarantee a responsible footprint?

Name: Mary Louise O'Brien

Address: 44-686 Kāne'ōhe Pl.

City, State, Zip: Kāne'ōhe HI 96744

Cc: Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

P.S. I have been known developer to keep their promise of minimal impact.

October 8, 2008

Mary Louise O'Brien  
444-686 Kahunani Pl.  
Kāne'ōhe, HI 96744

Dear Ms. O'Brien:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Impacts to Kāne'ōhe Bay from runoff.

Response: The proposed project is helping to improve the water quality of Kāwā Stream and ultimately Kāne'ōhe Bay (see Section 6.4 of the EIS for a more detailed discussion). The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used



to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

2. Impacts to underground water supplies.

Response: Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft Environmental Impact Statement (EIS), CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

3. Above ground erosion.

Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

4. Visual impacts of large mausoleums.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.

5. Can you guarantee a responsible footprint?

Response: It is our intent for the project to have a responsible footprint. Following Chapter 343, Hawaii Revised Statutes, an EIS is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to the environment.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*As an avid hiker who has hiked to the top of oneawa hills numerous times, I am appalled at the destruction you are about to do to this beautiful environment after you make these alterations to the HM cemetery. The trees & plants & fauna will be adversely impacted. In addition the view of oneawa hills - a beautiful sight - will be degraded. I am opposed to further expansion & development of this cemetery.*

*Don't Do it!*

Sincerely,

*PS Can hikers Ileana R Jones  
hike anytime or need permission to hike  
up the Mt?*

Name: Dennis R. Jones  
Address: 45-210 Nakulua Pl  
City, State, Zip \_\_\_\_\_

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Dennis Jones  
45-240 Nakulua Pl.  
Kāne'ohe, HI 96744

Dear Mr. Jones:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

- 1. Adverse impacts to trees, plants and fauna.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the Environmental Impact Statement (EIS), Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second

growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Koalea*, who forage in grassy areas with a good insect supply. The revegetation effort will include a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *Oahu 'Amakihi* and *Pueo*.

2. The view of Oneawa hills will be degraded.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Another section of the Petition Area has been set aside as a 9.4-acre cultural preserve, which will remain in its "natural" state except for a modest access road, and will retain the same appearance it currently has. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

3. Can hikers hike anytime or need permission to hike up the mountain?

Response: Recreational trail use through private property such as the Petition Area will be reasonably accommodated as long as respect is shown for our families and the features of the cemetery. We have coordinated with Department of Land and Natural Resources, Na Ala Hele

Trail and Access Program on the appropriate treatment approach to the trail that appears to traverse part of the Petition Area. HMP has no obligation to maintain or provide amenities for the trail.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

AS A CULTURAL PRACTITIONER  
THIS GOES AGAINST ALL MORELS -  
RUIN AN OLD CULTURAL CEMETERY  
TO BUILD A NEW CEMETERY AND  
LAND HOMES WE WONT BE ABLE AFFORD!  
SEWER, RUNOFF - IT WILL AFFECT  
THE STREAM'S KANEHOHE BAY.  
"PLAN" - IT STINKS!

Sincerely, Rev Richard Bermudez

Name: REV RICHARD BERMUDEZ

Address: 1314 KUUNA ST

City, State, Zip KAILUA HI

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Rev. Richard Bermudez  
1314 Kuuna St.  
Kailua, HI 96734

Dear Rev. Bermudez:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033-1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

- 1. Concerns about erosion and storm runoff during construction and once project is completed.

Response: As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

Retention areas are the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain



on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

2. Understand there will be a 5,000 square foot catchment near our home. How can you assure me this will not turn into Kaloiko Dam?

Response: As discussed in the EIS, retention areas retain storm water that then percolates into the soil and/or evaporates. They are not permanent ponds or dams of water, and will be reviewed and approved by the County DPP. The areas will be scattered throughout the cemetery and will be designed in a manner that allows them to blend in with the landscaped cemetery grounds. They will be mowable turf grass or will be vegetated with native and ornamental grasses. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and nuisance issues, as well as offsite liability.

3. Concerned about safety and crime as cemetery creates an easy access for burglars and criminals.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

4. Concerned about increase in traffic.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections

studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, we would like to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service those lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

5. Lack of concern for cultural heiau.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, HMP has modified the development program for the project in a second important manner and will create a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau. The cultural preserve will include five archaeological sites and large areas where the laua'e fern grows to provide future supply for those who gather this plant, to provide future supply for those who gather this plant.

Additionally, subsequent to land use approvals, an Archaeological Preservation Plan will be prepared. All of the issues related to access and the preserve area will be dealt with in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division

6. Native plants and birds.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth

forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kohea*, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, and *Pueo*. In addition, the 9.4-acre cultural preserve will remain intact in its "natural" state except for a modest access road.

7. Please stop project.

Response: We note your opposition to the proposed action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I strongly feel it is not in the best interest for this project because of many reasons.

The main reason is flooding causing property & threat to life. I have first hand witnessed this when the newer "Pikolen was developed.

Living on Natuluni St with one of the main gutters for water, I saw it overflow and gutters almost to my house up the driveway. My father fighting the debris to unclog the gutter and ~~many~~ many times slipping at the edge dangerously and almost caught in the gutter if it were not for the help of a neighbor!

Another reason is the beauty of these hills that I grew up with since I still live in Kaneohe and important reason why I still live in Kaneohe and did not move into the city after getting married with "a city boy". Many more reasons to list. Please Sincerely, *Jamie Imamura*

Name: Jamie Imamura

Address: 45-335 Nukulua'i St

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Janice Imamura  
45-335 Nakuluai Pl.  
Kāne'ōhe, HI 96744

Dear Ms. Imamura:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I strongly feel it is not in the best interest for this project. The main reason is flooding causing property and threat to life. I have first hand witnessed this when the 'newer' Pikoioa was developed.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Section 4.6 of the Draft Environmental Impact Statement (EIS) discusses the flood hazards in the Petition Area as well as the surrounding neighborhood. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The proposed retention system for the project has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality

Ms. Janice Imamura  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2



issues, as well as offsite liability.

2. The beauty of the hills that I grew up with are an important reason to live in Kāne'ōhe.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*This project is one of several other developments currently under review in Kaneohe. The cumulative effect of all these developments (the cemetery one being the most important) has been totally overlooked and will have an even bigger impact on the environment and traffic than presented. This is like ~~the~~ the tree that licks the forest. Historic remains should not be overlooked as there is already few historic sites. The patrimony needs to be wisely preserved for future generations.*

Sincerely,

*N. Martinot*

Name: Nicolas Martinot

Address: 45-620 Koale Place

City, State, Zip KANE OHE HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Nicolas Martinot  
45-620 Koale Pl.  
Kāne'ohe, HI 96744

Dear Mr. Martinot:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project is one of several other developments currently under review in Kāne'ohe. The cumulative effect of all of these developments has been totally overlooked and will have an even bigger impact on the environment and traffic than presented.  
Response: Cumulative impacts are discussed in Chapter 7.0 of the Environmental Impact Statement (EIS).
2. Historic remains should not be overlooked as there is already few historic sites. They need to be preserved.  
Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the historic sites in the vicinity of the Kawa'ewa'e Heiau are part of a complex of cultural sites, not discrete sites. In this context, we would like to point out that Hawaiian Memorial Park will modify the development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. This 9.4-acre area will remain intact in its current "natural" state, except for a modest access road.

Mr. Nicolas Martinot  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*My concerns are the impact ~~of~~ the Koolau aquifer. If drilling for wells to supply water for homes, treatment + irrigation were to occur. No aquifer would ~~be~~ the not be replenished and able to sustain ~~the~~ fresh water. existing area of the increased demand for the heiaus and in addition, the cultural areas of the heiaus and other Hawaiian artifacts should not be disturbed or ~~prevented~~ access ~~impacted~~.*

*Increased crime comes with development of any sort.*

*These concerns are of importance to our neighborhood and family -*

Sincerely,

Name: Pomai Victoria

Address: 45-174 Lipelu Pl.

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Pomai Uchibori  
45-174 Lipalu Pl.  
Kāne'ōhe, HI 96744

Dear Pomai Uchibori:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My concerns are the impact to the Koolau aquifer. If drilling for wells to supply water for homes, restrooms, and irrigation were to occur, the aquifer would not be replenished and able to sustain the existing area.

Response: We would like to point out that Hawaiian Memorial Park (HMP) has modified the development program for the project by eliminating the 20-lot residential subdivision. As a result, these homes will not be built and no domestic water will be needed for them. In regard to irrigation water, HMP's preference is to develop on-site wells. If on-site wells are not viable, only then would HMP use the domestic supply offered by the Board of Water Supply.

Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulates special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, Hawai'i Administrative Rules. According to the comment letter from CWRM for the Draft Environmental Impact Statement (EIS), CWRM does "not anticipate any impacts to the quantity of ground and surface water flows" as a result of the proposed project.

Pomai Uchibori  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2



2. The cultural areas of the heiaus and other Hawaiian artifacts should not be disturbed.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. In this regard, HMP has modified the project in another important manner by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that includes five archaeological sites and large areas of the laua'e fern. This cultural preserve will be designed in careful consideration of archaeological site boundaries and in relationship to contiguous sites.

3. Increased crime comes with development of any sort.

Response: According to the Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu. HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*My concerns are to protect Hawaiian areas  
as a complex protect historic sites. As a child  
growing up in this area all my life visiting  
these historic areas and learning from them. His  
made me who I am today, to respect the land.  
To open these areas up in the open may  
not be the right thing to do. Maunakea  
Windukemi!*

Sincerely,

Name: Darrin Yazaki  
Address: 45-174 Lipalu Pl.  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Darrin Yazaki  
45-174 Lipalu Pl.  
Kaneohe, HI 96744

Dear Mr. Yazaki:

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

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. My concerns are to protect Hawaiian areas as a complex of historic sites.  
Response: The statements about these sites being part of a whole complex are well taken, and Hawaiian Memorial Park (HMP) has modified the development program for the project with the creation of a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.
2. To open these areas up in the open may not be the right thing to do, meaning vandalism.  
Response: Please refer to response to Question #1 above for discussion of the cultural preserve that will be created. Subsequent to land use approvals, we are required to prepare an Archaeological Preservation Plan. All of the issues related to protection of the sites will be addressed in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division.



Mr. Darrin Yazaki  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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In addition, HMP is very concerned about proper security within the project area for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*As residents of Kaneohe for 44 years  
we are very concerned that the impact  
of this project to our ~~neighborhood~~ neighborhood  
will be negative. It will obstruct our  
view of the mountains and create more  
traffic & noise. We are also concerned  
about drainage & air quality.*

Sincerely,



Name: Stanley Kewehame

Address: 45-472 Naekelewa St

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Stanley Kawakami  
45-472 Nahuluai St.  
Kāne'ohe, HI 96744

Dear Mr. Kawakami:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project will obstruct view of the mountains.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several graphic figures.

We would like to point out that HMP has modified the Proposed Action in two significant ways that will affect views of the property: (1) the 20-lot residential subdivision has been deleted from the development program; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'eawa'e Heiau.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. Overall, no views of any mountains or ridges will be obstructed by the project.



2. Project will create more traffic and noise.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, as discussed in #1 above, HMP has eliminated the 20-lot subdivision from the development program. As a result, the Lipalu Street extension has also been eliminated. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and summarized below. Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

3. Concerned about drainage.

Response: As discussed in Section 6.4 of the EIS, retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). Final drainage and grading plans must be reviewed and approved by DPP and the State DOH.

4. Concerned about air quality.

Response: Hawai'i enjoys some of the best air quality within the United States (except areas exposed to the pollutants associated with the ongoing volcanic episode on the Big Island). In September 2008, an air quality analysis was conducted for the project, and found that factors favoring good air quality include the vicinity of the Petition Area to good exposure to tradewinds, and ample open space.

Some short-term direct and indirect impacts on air quality could potentially occur due to project construction, including construction vehicle emissions and particulate emissions connected with clearing, site preparation work, and construction equipment and workers travelling to and from the Petition Area. Contractors will be required to comply with the State Department of Health air regulations to minimize such impacts.

Fugitive dust emissions from construction activities are difficult to estimate accurately because of their elusive nature of emission and because the potential for dust generation varies greatly depending upon the type of soil at the construction site, the amount and type of dirt-disturbing activity taking place, the moisture content of exposed soil in work areas, and the wind speed. Uncontrolled fugitive dust emissions from project construction would likely be somewhere near the level estimated by the U.S. EPA's rough estimate for uncontrolled fugitive dust emissions from construction activity of 1.2 tons per acre per month under conditions of "medium" activity, moderate soil silt content (30%), and precipitation/evaporation (P/E) index of 50. State of Hawai'i Air Pollution Control Regulations prohibit visible emissions of fugitive dust from construction

activities at the project property line. Thus, an effective dust control plan for the project construction phase will be prepared.

Adequate fugitive dust control can usually be accomplished by the establishment of a frequent watering program to keep bare-dirt surfaces in active construction areas from becoming significant sources of dust. On days without rainfall, construction areas will be watered at least twice during the workday to keep dust to a minimum. Open-bodied trucks will be covered at all times when in motion if they are transporting materials likely to give rise to airborne dust. Haul trucks tracking dirt onto paved streets from unpaved areas are oftentimes a significant source of dust in construction areas. Some means to alleviate this problem, such as tire washing or road cleaning, if appropriate, will be employed. Dust monitoring will be considered as a means to quantitatively evaluate the effectiveness of dust control measures.

On-site mobile and stationary construction equipment also will emit air pollutants from engine exhausts. The largest of this equipment is usually diesel-powered. Nitrogen oxides emissions from diesel engines can be relatively high compared to gasoline powered equipment, but the standard for nitrogen dioxide is set on an annual basis and is not likely to be violated by short-term construction equipment emissions. Carbon monoxide emissions from diesel engines, on the other hand, are low and should be relatively insignificant compared to vehicular emissions on nearby roadways.

Indirectly, slow-moving construction vehicles on roadways leading to and from the project site could obstruct the normal flow of traffic to such an extent that overall vehicular emissions are increased. This impact can be mitigated by moving heavy construction equipment during periods of low traffic volume. Likewise, the schedules of commuting construction workers can be adjusted to avoid peak hours in the project vicinity. Air quality could be impacted additionally by fugitive dust from disturbance of dry exposed soil, and from increased vehicle emissions due to increases in traffic volume.

Potential operational period impacts of the Proposed Action on the surrounding area include increased air pollution from vehicular emissions. Any long-term impacts on air quality from traffic related to this project will likely be negligible. This impact is not expected to be significant, as there are no major sources of air pollutants associated cemetery uses.

Mr. Stanley Kawakami  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 5

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*Am concerned about the erosion storm runoff & the possible flooding to our property. We'll miss the singing of the birds that wake us up in the morning.*

Sincerely,

Name: Wilbur Amy Tanaka  
Address: 45-144 Namakee St.  
City, State, Zip: Kaunakakai, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

October 8, 2008

Wilbur and Amy Tanaka  
45-144 Namoku St.  
Kāne'ohe, HI 96744

Dear Mr. and Mrs. Tanaka:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We're concerned about the erosion and storm runoff.

Response: As discussed in Section 4.3.3 of the Environmental Impact Statement (EIS), temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).



Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and water quality issues, as well as offsite liability.

2. Concerned about possible flooding of our property.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Please refer to the answer to #1 above for information about the retention areas to be used in the project.

3. Loss of singing of the birds.

Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Almakihi, Pūeo, and any of the alien bird species typically found in Windward O'ahu.

In addition, the design plan for the expanded cemetery calls for the planting of over 300 new trees throughout the cemetery, which will provide additional habitat for birds.

Wilbur and Amy Tanaka  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 3

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am a 50 year resident of Kaneohe. I've seen Kaneohe Bay ruined by years of construction run-off. In spite of assurances by Hwa. Mem. Park develop. to the contrary, I foresee more pollution & run-off from construction over the next 10-20 years if HMP is allowed to move forward w/ their proposed plans.

There is not enough space on their sheet for me to express lots of other environmental, cultural, visual, psychological impact - all negative that I see coming from their proposed project. Please do NOT allow HMP to move forward w/ their

Sincerely, Wesley H. Urada

Name: Wesley H. Urada  
Address: 45-314 Koa Kahiko Street  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners



October 8, 2008

Wesley Urada  
45-314 Koa Kahiko St.  
Kāne'ohe, HI 96744

Dear Mr. Urada:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about pollution and runoff from construction over the next 10-20 years, especially Kāne'ohe Bay.

Response: As discussed in Section 6.4 of the Environmental Impact Statement (EIS), retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed project is helping to improve the water quality of Kāwā Stream and ultimately Kāne'ohe Bay. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and water quality

Mr. Wesley Urada  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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issues, as well as offsite liability.

2. Environmental, cultural, visual, psychological impacts.

Response: The EIS discloses and discusses environmental, cultural, and visual impacts. Following Chapter 343, Hawai'i Revised Statutes, the EIS is intended to disclose and provide information on all known or potential effects that the Proposed Action may have on the physical and socio-economic environment, as well as public facilities and services, and propose measures to either avoid or minimize adverse impact to all types of the environment.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned that any grading of the hill side above the cemetery will destroy the only remaining forested area in Kaneohe. I have lived in Kaneohe for over 48 years and I have seen the open space replaced by development - not always desirable. Your proposal should not take place in the Conservation District.*

Sincerely,

Name: Rom Duran  
Address: 45-601 Hoomailie St  
City, State, Zip Kaneohe

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Rom Duran  
45-601 Hoomailie St.  
Kaneohe, HI 96744

Dear Mr. Duran:

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

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned that any grading of the hillside above the cemetery will destroy the only remaining forest area in Kaneohe.  
Response: We acknowledge your concern, but do not believe that the Petition Area is the only remaining forest area in Kaneohe. In fact, the Proposed Action will leave over 60% of the affected parcel untouched, within the State Conservation District. As a footnote, the area is comprised primarily of introduced non-native plants and animals. As discussed in detail in the Environmental Impact Statement (EIS), Section 4.7, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area. In addition, Hawaiian Memorial Park has modified the development program for the project by creating a 9.4-acre cultural preserve east of Kawa ewa'e Heiau



Mr. Rom Duran  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

that encompasses five archaeological sites and large areas of lauau fern that can be used for gathering by hula practitioners and others. The cultural preserve will be left in its current "natural" condition except for a modest access road.

2. Your proposal should not take place in the Conservation District.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*One of my concerns is the size of the Mausoleums (3800 sq ft) and how they could crush the foliage during flooding. I am also wondering what the pool catchments are for. The flooding is incredible in this area.*

Sincerely, *Bob Jarvis*

Name: *George R Jarvis*  
Address: *45-170 Ohala Pl*  
City, State, Zip: *Kaunoipe, HI 96744*

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helbert, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Betty Jo Harris  
45-170 Ohaha Pl.  
Kāne'ohe, HI 96744

Dear Ms. Harris:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. One of my concerns is the size of the mausoleums and how they could crush the hillside during flooding.  
  
Response: The design of the mausoleums will take into account all topography and drainage of the area so that the mausoleums will pose no danger to the cemetery or the hillside. A structural engineer and a soils engineer will assist the architect to design these buildings, which must meet County building codes.
2. I am also wondering what the pool catchments are for.  
  
Response: Retention areas are the preferred method to control runoff. They will retain storm water that will then percolate into the soil and/or evaporate, and allow sediment to settle instead of reaching drainage ways, streams, and Kāne'ohe Bay. They are not permanent ponds or pools of water. The areas will be scattered throughout the cemetery and will be designed in a manner that allows them to blend in with the landscaped cemetery grounds.

Ms. Betty Jo Harris  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned about many things regarding this project, but will only address 2 at this time -*

- 1) The quality of water for existing homes due to tampering with the natural environment as well as adding actual grave sites and where the water supply is in relation to grave sites.*
- 2) I am convinced the crime rate would increase in the area due to ~~loss~~ more access to the existing homes. We are already seeing an increase of crime in Hawaii and I am concerned about the safety and well being of people who have lived in this area for decades. As I mentioned, there are much more concerns, but those will be addressed at another time.*

*Cheryl Reavis*

Name: Cheryl Reavis

Address: 46-318 Hauiki Rd #3

City, State, Zip: Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Cheryl Reavis  
46-318 Haiku Rd. #3  
Kāne'ohe, HI 96744

Dear Ms. Reavis:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned with the quality of water for existing homes due to tampering with environment and putting gravesites near water supply.  
Response: There is no evidence that Hawaiian Memorial Park (HMP) has contributed to groundwater problems or that the natural decomposition of casketed interments has or will have any impact on groundwater resources. In addition, we have contacted the Board of Water Supply and they have requirements related to cemeteries and ground water resources in the event that a cemetery is close to a well used for drinking water. In the case of HMP, there are no drinking water sources beneath the property, nor are there any wells used for drinking purposes in the vicinity.
2. I am convinced the crime rate will increase in the area due to more access to the existing homes. We are seeing an increase of crime in Hawaii and I am concerned about the safety and well being of people who have lived in this area for decades.  
Response: We understand your concern about the safety and well being of your family and neighbors. HMP is also very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

Ms. Cheryl Reavis  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I AM CONCERNED ABOUT THE RETENTION POND THAT WILL BE BUILT ABOVE MY HOUSE. I DON'T THINK THAT THE CALCULATIONS FOR ADDITIONAL RUNOFF OR THE 10 YEAR ONE HOUR STORM IS ADEQUATE. ALSO THE INCREASE IN CONSTRUCTION TRAFFIC, NOISE, DUST & INCONVENIENCE OVER A PERIOD OF 20 YEARS IS WAY OUT OF CONTROL. AND I THINK THAT ALL THE HISTORIC SITES, SOME OF THEM PRE CONTACT SHOULD BE KEPT AS ONE COMPLEX.

LEAVE MAHINUI AS IS

Sincerely,



Name: KARL REAVIS

Address: 45-422 OHAHA ST.

City, State, Zip KANEHOHE, HI. 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Karl Reavis  
45-422 Ohaha St.  
Kāne'ohe, HI 96744

Dear Mr. Reavis:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned about the retention pond that will be built above my house.  
  
Response: As discussed in the Draft Environmental Impact Statement (EIS), Section 6.4, retention areas retain storm water that will then percolate into the soil and/or evaporate, and allow sediment to settle, instead of reaching drainage ways, streams, and Kāne'ohe Bay. They are not permanent ponds or dams of water, and will be reviewed and approved by the County Department of Planning and Permitting (DPP) before construction and grading can begin.
2. Calculations for additional runoff or the 10 year 1 hour storm are not adequate.  
  
Response: The City and County of Honolulu DPP relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). These are the laws that apply to all development on O'ahu.
3. Increase in construction traffic.  
  
Response: As discussed in detail in Section 6.1 of the Draft EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service

(LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, Hawaiian Memorial Park (HMP) has decided to modify the project development program, and the 20-lot residential subdivision and the Lipalu Street extension to service these lots will be abandoned. Therefore, there are expected to be no impacts from traffic through your immediate neighborhood.

4. Increase in noise.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and are summarized in the paragraphs below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

5. Increased dust.

Response: Impacts from dust will be minimized by using several Best Management Practices such as watering, mulching, and temporary vegetation.

6. All historic sites should be kept as one complex.

Response: The statements about these sites being part of a whole complex are well taken. As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the historic sites in the vicinity of the Kawa'ewa'e Heiau are part of a complex of cultural sites, not discrete sites. In this context, HMP has also modified the development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laue fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I'm very against the Expansion of the Hawaiian Memorial Cemetery Expansion due to the following reasons.

1) The flooding problem existing presently where we have a heavy rainfall, the drainage overflow.

2) When all the trees are cut down that serves as a protection from the water coming down, and all the chemical sprays that Hawaiian Memorial uses, it will do more damage. 3) The traffic will worsen and the time that will come to our community. Please leave our peaceful community as it is.

Name: ~~SCOTT EZER~~ TEOPORA REAVIS

Address: 45-123 OIAHANA PL

City, State, Zip KANEIHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



October 8, 2008

Leonora Reavis  
45-173 Ohaha Pl.  
Kāne'ohe, HI 96744

Dear Ms. Reavis:



**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I'm very against the expansion of the cemetery.  
Response: We note your opposition to the Proposed Action.
2. Flooding problems already exist when we have a heavy rainfall  
Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. As discussed in Section 6.4 of the Draft Environmental Impact Statement (EIS), retention areas are the preferred method to control runoff.  
The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

3. Cutting down the trees that serve as protection from runoff.  
Response: Runoff is affected by the ability of the ground surface and soils to absorb rainfall and have this moisture percolate through the soil.

Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu DPP's Rules Relating to Storm Drainage Standards of January 2000. To replace the non-native forest that currently exists on site, approximately 29.5 acres will be turf and 11.4 acres will be revegetated with appropriate native plant material. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area. In total, only 4.8 acres (8.7%) of the 56.5-acre Petition Area will be converted to an impervious surface. The remaining 91.5% of the Petition Area will either be landscaped with a combination of turf and trees, or will be a forested environment.

4. Concern of chemicals sprayed by cemetery.

Response: We would like to point out that Hawaiian Memorial Park (HMP) does not operate like a golf course, and does not manage its turf grass as a golf course does. Herbicides/fungicides and pesticides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

5. The traffic will worsen.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street

Mrs. Leonora Reavis  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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extension that was intended to service those lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

6. Crime will come to our community.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I WOULD LIKE TO SEE THAT THE "10 PONDS" THAT ARE DESIGNED FOR THE HAWAIIAN MEMORIAL PARK EXPANSION BE APPROVED BY THE ARMY CORP OF ENGINEERS SO THAT THESE WATER CATCHMENT OR "RESERVOIRS" DON'T FAIL AND FLOOD THE EXISTING NEIGHBORHOOD BELOW. I DON'T WANT THE SAME SITUATION HAPPEN IN KANEHEHE THAT HAPPENED IN ANAHOLO, KAUAI.

Sincerely,

Name: Dan Williams  
Address: 45-155 UNAAHE PLACE  
City, State, Zip KANEHEHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Dan Williams  
45-155 Unahe Pl.  
Kāne'ohe, HI 96744



Dear Mr. Williams:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I would like to see that the 10 ponds that are designed for the project be approved by the Army Corps of Engineers so that these water catchment reservoirs don't fail and flood the existing neighborhood below. I don't want the same situation to happen as did on Kauai.

Response: The United States Army Corps of Engineers can only "approve" projects that are determined to be within the purview of their jurisdiction and determined to be navigable waters of the United States. This is not the case for this project. Retention areas will retain storm water that will then percolate into the soil and or evaporate, and allow sediment to settle, instead of reaching drainage ways, streams, and Kāne'ohe Bay. They are not permanent ponds or dams of water, and are approved by the County Department of Planning and Permitting. The areas will be scattered throughout the cemetery and will be designed in a manner that allows them to blend in with the landscaped cemetery grounds. They will be mowable turf grass or will be vegetated with native and ornamental grasses. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and nuisance issues, as well as offsite liability.

Mr. Dan Williams  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am very concerned & opposed to this development, it totally goes against the windward Oahu community plan. Your EIS study is flawed and I am insulted that it states that the visual impact of the development is minimal. One of the biggest issues is your lack of attention with promises nothing but trouble. This promises up to 20 yrs of pollution (air, noise, & nuisance) and it is unacceptable. The Kaneohe hillside is also a cultural treasure and opening it up to the public will not make it more secure. I am opposed to this 150% and will do all I can to stop it.

Sincerely,

Name: Angel Lemus  
Address: 45-214 Puali Koa Pl  
City, State, Zip Kaneohe, Hawaii 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Angel Lemus  
45-214 Puali Koa Pl.  
Kaneohe, HI 96744

Dear Ms. Lemus:

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

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project goes against the Windward Oahu Community Plan.

Response: We believe you are referring to the Ko'olau Poko Sustainable Communities Plan (SCP). As discussed in the Draft Environmental Impact Statement (EIS), the Petitioner understands that the Proposed Project is not in conformance with the existing Ko'olau Poko SCP, and the project will require an amendment to the Ko'olau Poko SCP. Section 3.2.2, Ko'olau Poko SCP, of the EIS explains the conformance with the SCP and potential options for this amendment.

2. Visual impacts will not be minimal.

Response: Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision and the Lipalu Street extension to service these lots from the development program.



For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

3. One of the biggest issues is the lack of water runoff containment.

Response: Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting (DPP) Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The proposed retention system has been developed to satisfy the DPP's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

4. Project will bring 20 years of pollution and noise.

Response: Construction will not be 20 years long, as the project is broken into three phases. Construction for each phase will last approximately six months.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS and summarized in the paragraphs below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess

of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

5. Kāneʻohe hillside is a cultural treasure and opening it up to the public will not make it more secure.

Response: Subsequent to land use approvals, HMP is required to prepare an Archaeological Preservation Plan. All of the issues related to protection of the sites will be addressed in this plan. HMP is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division.

In addition, HMP is concerned about proper security within the project area for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

6. Opposed to project.

Response: Your opposition to the Proposed Action is noted.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford: I am of Hawaiian Ancestry opposing your development plan for HMPC.

- ① I oppose possible access by the general public to the existing cultural sites and Heiau Complex. How will you regulate public gatherings?
- ② The quality of life for residents bordering your proposed development will allow criminals easy access to backyards for theft and maybe property damage. How will you address this probability? Public safety needs to be addressed.
- ③ Loss of Kawa Stream due to dry-up water won't feed Kaneohe Bay's ocean life. Many fishermen will have their livelihoods affected.
- ④ Known underground streams are not addressed in the EIS. Already the Veteran Cemetery have sinking graves by 18 inches. What precautions do you plan to prevent other parts of the proposed cemetery from sinking?
- ⑤ Open Space is a key view plane for Kaneohe. Homes on the slopes of the mountain will ~~be~~ be ruined.

Sincerely,

Paulette A. Tam

Name: Paulette A. Tam

Address: 45-611 Paholei St.

City, State, Zip Kaneohe HI 96744 - 1861

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Paulette A. Tam  
45-611 Paholei St.  
Kāne'ohe, HI 96744



Dear Ms. Tam:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I oppose possible access by the general public to the existing cultural sites and Heiau complex. How will you regulate public gatherings?

Response: We note your opposition to the general public having access to the archaeological sites. As noted in the Draft Environmental Impact Statement (EIS), the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites. In this context, the project program has been modified and Hawaiian Memorial Park (HMP) will establish a 9.4-acre cultural preserve that encompasses five archaeological sites and large areas of *laua'e* fern that are gathered by hula practitioners, within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This preserve area will be left in its current "natural" state except for a modest access road, and will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

Public gatherings will not be regulated, but it should be noted that the project is not going to change access that already exists. Also, subsequent to land use approvals, an Archaeological Preservation Plan will be prepared. All of the issues related to access and the cultural preserve will be dealt with in this plan. The landowner is committed to

working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by the State Historic Preservation Division.

2. The project will allow criminals easy access to backyards for theft and property damage.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

3. Loss of Kawa Stream due to dry-up water won't feed Kāne'ohe Bay's ocean life. Many fishermen will have their livelihoods affected.

Response: Under present conditions, Kāwā Stream is an intermittent stream. It has also been identified as an impaired waterway by the U.S. Environmental Protection Agency (EPA). Working with the State Department of Health, EPA has established guidelines to reduce pollutants that reach Kāwā Stream, and ultimately Kāne'ohe Bay.

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters.

The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. Because no additional runoff will enter Kāwā Stream, this equates to a net

reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability. In addition, HMP will participate in a water quality monitoring program to measure stream flow and water quality to ensure the future health of Kawā Stream and Kāne'ōhe Bay.

4. Known underground streams are not addressed in the EIS. The Veterans Cemetery has sinking graves. What precautions do you plan to prevent other parts of the cemetery from sinking?

Response: The ground-subsidence problems that have occurred at the Veteran's Cemetery have not occurred at HMP.

5. Open space is a key view plane for Kāne'ōhe.

Response: In addition to the creation of the 9.4-acre cultural preserve, the development program has been modified to eliminate the 20-lot residential subdivision and the Lipalu Street extension. Consequently, only 4.8 acres (8.5%) of the total 56.5-acre Petition Area will be converted to impervious surfaces. The remainder of the property will be left in open space, with 9.4 acres retained in their current "natural" condition. Therefore, the proposed cemetery space will continue to be an open space viewplane for Kāne'ōhe.

6. I oppose all development plans for Hawaiian Memorial Park Cemetery.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Barbara Duran  
45-601 Ho'omaile St.  
Kāne'ohe, HI 96744

Dear Ms. Duran:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am greatly concerned about the destruction of the view planes this development will bring. It will be visible from as far away as the tunnels, and everywhere in Kāne'ohe.

Response: Hawaiian Memorial Park has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS, including from the H-3 freeway. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am greatly concerned about the destruction of the view plane. It this development will bring. It will be visible from as far away as the tunnels, and from virtually everywhere in Kāne'ohe. Also, the loss of that many trees - their bird population, their cooling effect and their beauty - will be a horrible loss for our community.*

Sincerely,

*Barbara Duran*

Name: Barbara Duran

Address: 45-601 Ho'omaile St

City, State, Zip: Kāne'ohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners



The Petition Area and associated cemetery are visible from the H-3 freeway, although as a small portion of the overall viewshed which is predominately one of residential neighborhoods with the Oneawa Hills as a backdrop. Additionally this view is one that is seen for only a matter of seconds while travelling at 55 miles per hour in a car. Nevertheless, the Petition Area and project are visible from this vantage point.

2. Concern about the loss of that many trees and birds as well as the cooling effects from the trees.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants, as discussed in detail in Section 4.7 of the EIS, Flora. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area.

The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed HMP expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.

Research on the impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

1330 Maunakea Street  
Honolulu, Hawaii 96813

Helber Hastert & Fee  
Planners, Inc.

Dear Mr. Morford:

*I am against any expansion of Hawaiian Memorial Park as proposed by Service Corporation International in their attempt to reclassify 56 acres of conservation land above the Pipikalan Subdivision.*

*Any proposed expansion project would increase the chances of flooding and damage to the Kawa Stream watershed. I am further concerned of a increase in motor vehicle traffic on Mokulele Drive as a result of the proposed expansion project by Service Corporation International.*

*I am against any attempt to build additional housing subdivisions in the Pipikalan area, which is already congested, and would destroy the watershed and greatly alter water runoff.*

Sincerely,

Name: John D. Bennett  
Address: 45-340 Mokulele Dr.  
City, State, Zip Kaneohe, HI 96744-2245

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

John D. Bennett  
45-340 Mokulele Dr.  
Kāne'ohe, HI 96744

Dear Mr. Bennett:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am against any expansion of Hawaiian Memorial Park.

Response: We note your opposition to the Proposed Action.

2. Project will increase the changes of flooding and damage to the Kawa Stream watershed, altering water runoff.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. As discussed in detail in Section 6.4 of the Draft Environmental Impact Statement (EIS), retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily



Mr. John Bennett  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

3. I am further concerned of an increase in motor vehicle traffic on Mokulele Dr.

Response: We would like to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service the subdivision. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am a resident at Polahi Nani Retirement Community within the view of the proposed developments. We do not regard Polahi Nani as "surrounded by beauty". We do not consider large homes + motorways as part of that picture. We will be very disappointed. Of course within the 20 year development period all of us will die. Many of us, + certainly we, would rather be scattered in an ocean or a forest than a self-course type cemetery. We have a market of aging hippies - they want anything but conventional cemetery lots - develop a forested cemetery that doesn't dominate the view.*

Sincerely,

Name: John W. Boggs  
Address: 45-090 Naupaka St. #912  
City, State, Zip: Kaunohi HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Jo An W. Boggs  
45-090 Namoku St. #912  
Kāne'ohe, HI 96744

Dear Ms. Boggs:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am a resident of Pohai Nani with a full view of the proposed development and do not want to view large homes and mortuaries.

**Response:** The view from Pohai Nani is not a public view, and while the project will change the view from Pohai Nani, the view will still be predominately one of green open space one. We would like to tell you that Hawaiian Memorial Park has modified the development program by eliminating the 20-lot residential subdivision and adding 9.4-acre cultural preserve east of Kawā'ewa'e Heiau. The cultural preserve will remain intact, except for a modest access road.

The cemetery expansion will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area. Also, the area near Pohai Nani is in Phase 3 of the development, and will not be developed for 10-15 years.

Ms. JoAn Boggs  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

2. Many of us, including me, would rather be scattered in an ocean or forest and not buried in a golf-course type cemetery. Look into the market of the now aging hippies, they want anything but the conventional cemetery lots. Develop a forested cemetery that doesn't desecrate the view.

**Response:** The Environmental Impact Statement (EIS) documents the rise in preference for cremation over casketed burials during the last 20 years. However, the change in preference seems to have leveled off recently. Even with a majority of preference for cremation, the number of burials will continue to increase as the population ages, with ever-increasing numbers in older age cohorts.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I do not represent Pohai Pani,  
I am a resident living in a  
cottage on the "Campus". I'd be  
interested in the traffic pattern  
of cars and trucks into the housing  
lots for sale, where will this traffic  
exit? Will it be through the Hawaiian  
Park grounds?*

Sincerely,

*Jee Vuillemot*

Name: ANNIE LEE VUILLEMOT

Address: Cottage "J", 45-090 Namoku St.

City, State, Zip: KANEHOHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Annie Lee Vuillemot  
Cottage "J" 45-090 Namoku St.  
Kane ohe, HI 96744

Dear Ms. Vuillemot:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kane ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I'm interested in the traffic pattern of cars and trucks into the housing lots for sale. Where will this traffic exit?

Response: We want to take this opportunity to inform you that Hawaiian Memorial Park has decided to modify the project development program and will eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

*Scott Ezer*

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

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Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am not only opposed  
to every aspect of this development  
plan*

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Jacklyn Flame  
45-090 Namoku St.  
Kāne'ohe, HI 96744

Dear Ms. Flame:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am violently opposed to the project.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

*Outraged*  
Sincerely,

HELBER HASTERT & FEE, Planners

*Scott Ezer*

Scott Ezer  
Principal

Name: *Jacklyn Flame*  
Address: *45-090 Namoku St.*

City, State, Zip: *Kāne'ohe HI 96744*

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I am a resident living on the 10<sup>th</sup> floor with a wonderful view of the hills & valley leading up to the present HMP. Your proposed plan will devastate a large portion of this land leading to loss of habitat, drainage & pesticide into the streams and bay, and using valuable water which is in short supply. How can you justify this action in view of our need to protect our environment, support sustainable future?

Sincerely,

James E. Drobbaugh

Name: James E. Drobbaugh  
Address: 45-090 Namoku St. # 1015  
City, State, Zip Honolulu, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

James E. Drobbaugh  
45-090 Namoku St. #1015  
Kāne'ohe, HI 96744

Dear Mr. Drobbaugh:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Your proposed plan will devastate a large portion of land leading to loss of habitat, drainage, and pesticides into the streams and Bay.

Response: As discussed in the Environmental Impact Statement (EIS) in Section 4.8, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to other open space will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pūeo, and any of the alien bird species typically found in Windward O'ahu. In addition, over 300 new trees are proposed as part of the overall landscape plan for the project.

We would also like to let you know that Hawaiian Memorial Park (HMP) has modified the development program by establishing a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that includes five archaeological sites





and significant areas of the laua'e fern used by hula practitioners. All told, only 4.8 acres (8.7%) of the project area will be converted to impervious uses.

Drainage will be managed by a series of on-site retention areas. Section 6.4 of the EIS discusses in detail the retention areas that are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

We would like to point out that HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

2. Project will use valuable water which is in short supply.

Response: Options for irrigation water are discussed in the Draft EIS in Section 6.2.2. The primary option for irrigation water will be to develop on-site wells above groundwater that is not used for domestic supply. Domestic water will only be used if on-site wells are not productive. In addition to establishing a 9.4-acre cultural preserve, HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that was intended to service the subdivision. Consequently, the need for potable water will be greatly reduced. Irrigation water will still be required for the cemetery.

Water conservation measures will be explored, where possible, such as the use of waterless urinals and other water reduction techniques. The proposed project will include revegetation with appropriate adaptive native and indigenous species. Some adaptive Polynesian-introduced plants may be used as well, all of which will require little watering once established. It should be noted that in a typical year, very little supplemental irrigation will be required for the cemetery landscape areas, especially after plant material and turf has been established after a "grow-in" period of several months. For the watering that will be needed, the cemetery's irrigation system will employ weather-based "smart" evapotranspiration controllers. In addition, the project will incorporate exfiltration systems under the roadways to maximize infiltration under the pavement.

3. How can you justify this action in view of our need to protect our environment?

Response: As discussed in the EIS, Section 1.8, the Need for Action, Hawaiian Memorial Park (HMP) anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial space in Hawai'i is a very real community service, and is in fact rising. Hawai'i's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial and with the expected increase in numbers of burials associated with Hawai'i's aging population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawai'i, and will have significantly constrained inventory resources over the next five years. In

Mr. James Dronbaugh  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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order to continue to provide this service to the community, HMP must expand its ability to accommodate both casketed burials and niches.

We also believe HMP's approach to land management, the retention of 91% of the project in pervious open space, and the aggressive approach to landscaping and drainage are responsible conservation practices.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Why do you have to expand? It is big enough already.  
What are you going to do to my street? How are  
you going to keep me safe when I ride  
my bike? Please don't expand.

Sincerely, *Carissa Yoshimori*

Name: Carissa Yoshimori

Address: 45-464 Lipala St.

City, State, Zip Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Carissa Yoshimori  
45-464 Lipalu St.  
Kāne'ohe, HI 96744

Dear Ms. Yoshimori:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Why do you have to expand?

Response: It is essential that we plan for the future, which includes an increased population with a significant increase in the percentage of our residents who will become elderly in the next 20+ years. Part of the planning includes anticipation of the facilities and services necessary to support interment and inurement of family members in the future. The certitude of the need for these facilities cannot be ignored, and the cemetery expansion will meet this need.

2. How are you going to keep me safe when I ride my bike?

Response: Hawaiian Memorial Park has decided to eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service those lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

3. Please don't expand.

Response: We note your opposition to the project.

Ms. Carissa Yoshimori  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I am concerned about  
possible flooding from storm runoff  
and cutting down the forests and  
plant life  
also spoiling our view - we're supposed  
to be "Surrounded by Beauty" - not a lot  
of more housing.*

Sincerely,

Name: Jean Wittmaack  
Address: 45-090 Namoku Pl. #807  
City, State, Zip Honolulu, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Jean Wittmaack  
45-090 Namoku St. #807  
Kāne'ohe, HI 96744

Dear Ms. Wittmaack:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I am concerned about flooding from storm runoff and cutting down forests and plant life.

Response: As discussed in Section 6.4 of the Environmental Impact Statement (EIS), retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

The City and County of Honolulu Department of Planning and Permitting (DPP) Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The proposed retention system has been developed to satisfy the DPP's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.



Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area.

2. I am concerned about spoiling our view: we're supposed to be surrounded by beauty, not a lot more housing.

Response: After considering many of the comments received during the public review period for the EIS, HMP has decided to amend the development program for the project by eliminating the 20-lot residential subdivision.

HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*Please see explain the following:*

1. Why was the land in question made a conservation area??
2. Has the need for conserving this land decreased since the population of Kaneohe has grown?
3. Isn't conserving our most precious natural resource more important than a larger cemetery?

Sincerely,

*Elizabeth A. Porter*

Name: \_\_\_\_\_  
 Address: 45-090 Namoku St. #606  
 City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
 Dan Davidson, Land Use Commission, State of Hawaii  
 Helber, Hastert and Fee, Planners

*P.S. Doubt the Hi. Memorial rethink their land use + make better use of what they have?*

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Elizabeth A. Porter  
45-090 Namoku St. #606  
Kāne'ohe, HI 96744

Dear Ms. Porter:

Draft Environmental Impact Statement  
 Hawaiian Memorial Park Cemetery Expansion  
 TMK (1) 4-5-033:1  
 Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Why was the land in question made a conservation area?

Response: As discussed in Section 3.1.3 of the Environmental Impact Statement (EIS), the State Land Use Commission, pursuant to Chapter 205, HRS, has classified all lands in the State of Hawai'i into one of four land use districts: (1) Conservation; (2) Agricultural; (3) Urban; and (4) Rural. These designations were part of the process that created the State Land Use Commission, and their classification of all land in Hawai'i in 1969. There is no record of specific reasons that the Petition Area was initially designated as Conservation Land. It is probable that a large factor affecting its designation was the fact that the property was a large tract of open space.

2. Has the need for conserving this land decreased since the population of Kāne'ohe has grown? Isn't conserving natural resources more important than a larger cemetery? Shouldn't Hawaiian Memorial Park rethink their land use and make better use of what they have?

Response: The use of land is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
 Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com



Ms. Elizabeth Porter  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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We agree that conserving Hawai'i's natural resources is important. Nevertheless, it is essential that we plan for the future, which includes an increased population with a significant increase in the percentage of our residents who will become elderly in the next 20+ years. Part of the planning includes anticipation of the facilities and services necessary to support interment and inurement of family members in the future. The certitude of the need for these facilities cannot be ignored.

As discussed in Section 1.8 of the EIS, the Need for Action, Hawaiian Memorial Park (HMP) anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial services in Hawai'i is a very real community service, and is in fact rising. Hawai'i's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial and with the expected increase in numbers of burials associated with Hawai'i's aging population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawai'i, and will have significantly constrained inventory resources over the next five years. In order to continue to provide this service to the community, HMP must expand its ability to accommodate both casketed burials and niches.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTER & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Pohai Nani is a place of beauty. We would hate to have you spoil it with your future plans. It would be a terrible mistake to build all those houses next to us. You are not thinking of the water supply and the effect it would have on animals and birds in that section. Please don't do it!!

Sincerely,

Name: Mary E. Graves  
Address: 45-096 Napoaka St. Apt. 613  
City, State, Zip: Kaneohe, HI. 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Haster and Fee, Planners

October 8, 2008

Mary E. Graves  
45-090 Namoku St. Apt. 613  
Kāne'ohe, HI 96744



Dear Ms. Graves:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Pohai Nani is a place of beauty. We would hate to have you spoil it with your future plans.  
Response: We note your opposition to the Proposed Action.
2. You are not thinking of the water supply and the effect it would have on animals and birds.  
Response: The demand for drinking water will be reduced significantly because Hawaiian Memorial Park (HMP) has modified the project development program by eliminating the 20-lot residential subdivision. The need for irrigation water still exists, and options for irrigation water are discussed in Section 6.2.2 of the Draft Environmental Impact Statement (EIS). The primary option for irrigation water is to develop an on-site well. Since groundwater in the area does not provide domestic supply, there would be no impact to the domestic water supply available via the Board of Water Supply. Only if an on-site irrigation well is not feasible would domestic water be used for irrigation.

Impacts to groundwater resources are not anticipated. Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also

regulates special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Koala*, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, *Pueo*, and any of the alien bird species typically found in Windward O'ahu.

In addition, the landscape plan for the project calls for over 300 new trees. Finally, HMP has modified the development program by creating a 9.4-acre cultural preserve east of Kawaewa e Heiau that encompasses five archaeological sites and large areas of *laua'e* fern that can be used for gathering by hula practitioners and others. The cultural preserve will be left in its current "natural" condition except for a modest access road.



Ms. Mary Graves  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*The whole project is not needed or wanted here. The cutting down of trees should be against the law. Also a mainland group coming here to make money off the people of Paroike should be against the law also. You will ruin the area around our home, Pōkai Nani! Please take your project some where else.*

*Jenine K. Karama Martin*

Sincerely,

Name: Katharine Martin

Address: 4500 Maunakea St. #512

City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Katherine Martin  
45-090 Namoku St. #512  
Kāne'ohe, HI 96744

Dear Ms. Martin:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 16, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Project is not needed or wanted here. You will ruin area around Pohai Nani.

Response: We note your opposition to the Proposed Action.

2. Cutting down trees should be against the law.

Response: We note your belief that cutting down trees should be against the law, but in fact this is not the case. The cutting of trees is governed by Revised Ordinances of Honolulu Section 14-14.2A, which dictates the requirements when applying for a grubbing permit. A grubbing permit will be obtained for the project and all requirements will be followed to ensure minimal impacts from the removal of the trees.

Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. To replace the non-native forest, the proposed project will include revegetation of approximately 11.4 acres with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area.

Ms. Katherine Martin  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*I have recently been made aware that there is a movement to make some drastic changes on the hillside where the Hawaiian Memorial Park is located.*

*I am a member of the core team called Peleae Nani and have lived here in Peleae for over seven years. I chose to retire here because of its distance from a larger and more populated population knowing that the land around it would be more separate from more buildings. In addition to the protection of the cemetery there is also the Hawaiian Heiau and the probable iwi burials. At least, I hope so.*

*I should your people still be successful in your endeavor to build on the hillside, the land will first be cleared of all those trees, filled and partially leveled. There will be ground water run-off from roads and less planting - less protection for the Heiau and iwi.*

*I do not look forward to more housing on this conservation land and given the opportunity I will certainly vote against it.*

Sincerely,

Name: Marguerite S. Peach #408

Address: 45-090 Namoku St.

City, State, Zip Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Marguerite S. Peach  
45-090 Namoku St. #408  
Kāne'ohe, HI 96744

Dear Ms. Peach:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concern about Hawaiian heiau and the probable iwi burials.

Response: As discussed in the Environmental Impact Statement (EIS), no human burials have been documented within the Petition Area, and CIA contributors did not specifically mention knowledge of iwi kūpuna in the area. Those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. Access arrangements will be documented as part of the Preservation Plan that will be prepared for the property at a later date.

In regard to heiau, the Kawa'ewa e Heiau is not located within the Petition Area and will remain untouched. In regard to other sites, Hawaiian Memorial Park (HMP) will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful

consideration of site boundaries and in relationship to contiguous sites, and will remain in its current "natural" condition except for a modest access road.

- Hillside will be cleared of trees and filled and partially leveled.

Response: As discussed in Section 4.7 of the EIS, the proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area. Grading will change some elevations on the property, but it will not be leveled.

- There will be ground water runoff from roads.

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates.

Impacts to groundwater resources are not anticipated. Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

- Less plantings or protection for the Hawaiian birds.

Response: As discussed in Section 4.8 of the EIS, Fauna, the proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence

of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kolea, who forage in grassy areas with a good insect supply. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pueo, and any of the alien bird species typically found in Windward O'ahu.

- I do not look forward to more housing on the conservation land and given the opportunity I will vote against it.

Response: We note your opposition to the Proposed Action. We would like to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lupalu Street extension. Therefore more housing will not be built as part of the cemetery expansion project.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

In reference to your proposed extension of Hawaiian Memorial, I have seen your design assumptions in the E.I.S. I live in Pohai Nani an adjacent property to your proposals. This past rainy season there was flooding of roads in the low lying areas. If a 100 year storm can occur back to back, surely a 10 year storm is most inadequate don't you think? Are you willing to raise and upgrade existing roads to mitigate the problem?

Are you prepared to increase the ponding capacity of designated areas and increase as necessary?

Overall, I disagree with your E.I.S. state we of "No appreciable impact anticipated"

Sincerely,  
Tha G. Wai

Name: MR THA G. WAI

Address: 45-090 NAMOKU STREET, API# 607

City, State, Zip KANEHOE, HAWAII 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Tha G. Wai  
45-090 Namoku St. #607  
Kāne'ohe, HI 96744

Dear Mr. Wai:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The past rainy season there was flooding of roads in the low lying areas. If a 100 year storm can occur back to back, surely the 10-year storm is most inadequate. Willing to raise and upgrade the existing roads to mitigate the problem?

Response: As discussed in the Environmental Impact Statement (EIS), retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). There are certainly no guarantees when it comes to anticipating the occurrence of intense storms. We can respond to the requirements of civil engineer design as they pertain to the City and County of Honolulu.

2. Area you prepared to increase the ponding capacity of designated areas as necessary?

Response: Please refer to the answer to Question #1 above for a discussion of the retention areas.

Mr. Tha Wai  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

3. I disagree with your EIS statement of no appreciable impacts anticipated.  
Response: We note your opposition to the conclusion of no appreciable impacts anticipated.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

*No! No!! and No!!! to those who  
come from the Mainland and want to  
rip up a piece of our small island here in  
Kaneohe when they have a lot more room back  
where they came from. They - and their plans  
are not needed - or wanted - here.*

Sincerely,

Name: Elizabeth S. Marr  
Address: 45-090 Maunakea St. # 415  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Elizabeth S. Marr  
45-090 Namoku St. #415  
Kāne'ohe, HI 96744

Dear Ms. Marr:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Against project.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final Environmental Impact Statement.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My main concern is ONE question:  
Will you hear the cries & outrage of  
the people from this neighborhood  
and community and all across  
this island regarding the HMP  
expansion??  
What we propose is based on truth,  
facts, history and what's best for  
us and our beloved island -  
please open your ears and hearts  
and really hear what we are

Sincerely,

Name: Cher Leavis  
Address: 45-472 Chaka St.  
City, State, Zip: Kaneohe 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

passionately saying in defense of what is the right thing to do for our beloved mountainside, which is zoned CONSERVATION LAND - WE WANT IT TO STAY THAT WAY - we love Hawaii and desire to preserve what we have left, unlike SCI who has a different agenda - FOLLOW THE \$\$\$ - they are determined to force their way into our back yards and we are absolutely against it! FOR GOOD REASON!

please answer my question - will you listen to us???

STOP THE EXPANSION!

WE WILL RESIST TILL THE END!  
Jay, whose side are you on??  
Why are you buying into this???

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Char Reavis  
45-422 Ohaha St.  
Kāne'ohe, HI 96744

Dear Char Reavis:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Oppose the project.

Response: We note your opposition to the proposed action, and that you do not have any comments on the Draft Environmental Impact Statement (EIS). Nevertheless, your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission





July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

~~Hi~~ 'O wai o Jamie lei vaiauhēe laimāne  
wale. 'O wai ke keiki o ka 'ohana laimāne.

Noho au ma Keapuka ma Kaneohe i kōnō ā pau.  
e nāe I'm against your proposed plan and  
would like you to answer a few questions:

- ① How will you <sup>plan to</sup> protect those cultural sites ~~that~~ that you'll leave exposed?
- ② ~~The gathering~~ Gathering for traditional practices ~~and~~ can not be put on a time scheduled as one who practices gathering ~~in~~ must have →

Sincerely,

*JAMIE*

Name: Jamie Wale

Address: 45-35A Nakuwai St.

City, State, Zip: Kaneohe, Hawaii 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

access to traditional plants when the time  
calls for it, how do you plan to accommodate  
an every changing schedule? ~~Access to~~ How  
will encourage growth of plants and herbs  
if you take down the shelter for it?

④ My mana'o is, we, as keiki of this  
~~land~~ land have kuleana to preserve  
and these proposals you have go  
completely against it.

Lastly ④, How do you plan to not overwhelm  
the loko 'Ia Waiakua, its already faced  
Such pollution from the Bay ~~Area~~ Views golf  
course and neighborhood, how will your  
golf course and added runoff and waste  
not affect? (which happens to be <sup>another important</sup>  
cultural site?)

October 8, 2008

Jamie Walk  
45-359 Nakululai St.  
Kāne'ōhe, HI 96744

Dear Mr. Walk:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Against proposed plan.

Response: We note your opposition to the proposed action.

2. Gathering for traditional practices can not be put on a time schedule; how do you plan to accommodate an ever changing schedule?

Response: The landowner is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point in time, we have been unsuccessful with our attempts to have groups come forward and identify where they are gathering lau'ae. However, to honor a commitment to provide for these rights, Hawaiian Memorial Park (HMP) will be revising the Environmental Impact Statement (EIS) to incorporate a 9.4-acre cultural preserve area that will include areas where lau'ae is plentiful as well as encompass five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This cultural preserve area will remain intact in its current "natural" state, except for a modest access road. A Preservation Plan must be prepared for the cultural preserve, which must be approved by the State Historic Preservation Division. Issues that deal with access to the area will be covered in the Preservation Plan.



Mr. Jamie Walk  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

3. How will we encourage growth of plants and herbs when the shelter trees are taken down?

Response: Please see answer to Question #2 above that describes the cultural preserve area to be established.

4. How do we plan to not overwhelm Loko lam Waikahia, which is already faced with such pollution? How will your golf course and added runoff and waste not affect this important cultural site?

Response: First of all, we would like to point out that the project is not a golf course, but an expansion of the HMP Cemetery. Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne'ōhe Bay. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP, both for appearance and water quality issues, as well as offsite liability.

Mr. Jamie Walk  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I live on Oahu bt I am very concerned about erosion & storm runoff into our back yard. When the cemetery is under construction and completed. I understand there will be a catchment (a 5000 sq ft one) near our home. What / how can you assure me that this will not turn into a Kotoko Dam. I have a young child & a large group of family & friends that I do not want to be hurt from the trickle down effect of this project. I am also very concerned about the safety of my family & home. The cemetery creates an easy access for burglars & criminals. My home is my home! I Sincerely, want to feel safe there. →

*Wendi Takagawa*

Name: WENDI TAKAGAWA

Address: 45-400 OHAHA BT

City, State, Zip KANELOHE, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

I am concerned about the increase in traffic in the area. Just in crime.  
I am concerned about the lack of concern for our cultural heaath, native plants & birds.  
Please stop this project.

Thank you.

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Wendi Nakagawa  
45-420 Ohaha St.  
Kāne'ohe, HI 96744

Dear Ms. Nakagawa:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns about erosion and storm runoff during construction and once project is completed.

Response: As discussed in Section 4.3.3 of the Environmental Impact Statement (EIS), temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates.



2. Understand there will be a 5,000 square foot catchment near our home. How can you assure me this will not turn into Kaloko Dam?

Response: Retention areas are not permanent ponds or dams of water. They are designed to allow stormwater to infiltrate into the soil and evaporate. The areas will be scattered throughout the cemetery and will be designed in a manner that allows them to blend in with the landscaped cemetery grounds. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and nuisance issues, as well as offsite liability.

3. Concerned about safety and crime as cemetery creates an easy access for burglars and criminals.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

4. Concerned about increase in traffic.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of a Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In addition, the Petitioner has modified the Proposed Action by eliminating the 20-lot residential subdivision and the Lipalu Street extension from the

development program. As a result, there are expected to be no impacts from traffic through your immediate neighborhood.

5. Lack of concern for cultural heiau.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawā'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The project will preserve all significant archaeological sites within or near the Petition Area through the establishment of a cultural preserve area. This preserve will be 9.4 acres, and will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

6. Native plants and birds.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 88% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Kōlea, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native

Ms. Wendie Nakagawa  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 4

and Polynesian-introduced plants could provide habitat for a number of  
avian species including the Oahu Amakihi and Pueo.

7. Please stop project.

Response: We note your opposition to the proposed action.

We appreciate your participation in this review process. Your letter and this  
response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

My name is Ernest K. Makainai and  
have been a resident here in Pikoiloa for  
most of my life. With many developments  
here on the beautiful windward side and  
all the increase in traffic, I am saddened  
that Hawaiian memorial park would even  
think of expanding the park into now consecrated  
land. My family opposes this expansion because  
of many credible reasons - removal of native plants,  
trees, heavy rains that may wash dirt into Kaneohe  
bay where the bay is finally repairing itself, Hawaii  
burial grounds being interrupted by heavy equipment -  
Sincerely, "Continue on other side" →

*Ernest K. Makainai*

Name: Ernest Kalani Makainai

Address: 45-213 Makua, HI

City, State, Zip Kaneohe, HI, 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

And many native birds that may reside there as well as native insects & other indigenous living things that may be there that no one has ever really studied on. And of course, the many more increase in traffic that will be coming in and going out. Mr. Morford, I hope you will take this letter as not just a one persons view, but a whole community view.

Malama Ke Aina, e

Take care the land and it will take care you.

Malama pono

*Ernest G Makainai*

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Ernest Kalani Makainai  
45-213 Nakuluai St.  
Kāne'ohe, HI 96744

Dear Mr. Makainai:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Oppose the project because of removal of native plants and trees.

Response: We would like to clear up a misconception you have concerning the vegetation found on the Petition Area. Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in Section 4.7 of the Environmental Impact Statement (EIS), Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic. The landscape approach for the project calls for revegetation of 11.4 acres with a native and indigenous plant palette, along with the planting of over 300 new trees, most of which will be native or indigenous.

2. Heavy rains may wash dirt into Kāne'ohe Bay.

Response: Retention areas are included in the Concept Plan to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized



as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. In fact, a net reduction is expected of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne ōhe Bay. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park; both for appearance and water quality issues.

3. Hawaiian burial grounds being interrupted by heavy equipment

Response: As noted in the EIS, no human burials have been documented within the Petition Area, and Cultural Impact Assessment (CIA) contributors did not specifically mention knowledge of *iwi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities.

As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the CIA to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. In this context, Hawaiian Memorial Park (HMP) has modified the development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931, areas where the concentration of laua'e fern are found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites, and will be retained in its current "natural" state, except for a modest access road.

4. Many native birds that may reside there, as well as native insects and other indigenous living things.

Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kolea*, who forage in grassy areas with a good insect supply. The revegetation of the 10.6 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, and *Pueo*.

A survey of native invertebrate resources for the Petition Area was conducted in August 2008 by Steven Lee Montgomery, Ph.D. Survey results have been added to Section 4.8.1 of the Final EIS and are summarized below.

The primary purpose of the survey was to determine the presence or absence in the Petition Area of any endemic or indigenous terrestrial invertebrates, especially any species with legal status under federal or state threatened and endangered species statutes.

The survey methodology included a general assessment of terrain and habitats after reviewing maps and prior reports. Surveying efforts were conducted by day and night to ensure a thorough survey. The property was traversed across all habitat types, alternately following established pathways to search for any native botanical resources and substitute host plant options for native invertebrates. The collection methods used were appropriate for terrestrial invertebrates for the terrain, botanical resources, and target species, and included: 1) host plant searches (visual inspection of resting sites and searching known feeding or breeding sites such as under dead bark); 2) use of sweep nets (a general method of censusing most flying and perching insects where a fine mesh net was swept across



plants, leaf litter, etc. to sample any flying or perching insects); 3) visual observation (any visual evidence of arthropod presence or activity. Visual observations provide valuable evidence and are a cross check that extends the reach of sampling techniques); and 4) light sampling, which surveys insects active at night (using a bright light in front of a white cloth sheet).

The survey focused on finding any endemic and indigenous Hawaiian species. No attempt was made to collect or completely document the many common alien arthropod species present in the area. Three native species were encountered: the endemic bug *Trigonotylus hawaiiensis*, the endemic Moss moth (*Eudonia* sp.); and the endemic small moth or micro-moth (*Mesotobes*). No native mollusks were observed and no invertebrate listed under either federal or state endangered species statues was located. The extremely low level of native plants serving as arthropod hosts is most likely the reason for the absence of Hawaiian arthropods in the Petition Area.

To Section 4.8.2, Probable Impacts, the following language was added:

"No Federal or state listed endangered or threatened invertebrate species were found in the Petition Area; nor were any rare native Hawaiian invertebrate species observed. The few native Hawaiian invertebrates observed are widespread in distribution. The anticipated actions related to the Proposed Action are not expected to have a significant negative impact on an endemic or indigenous species. No part of the property is designated critical habitat for any threatened or endangered species."

5. Increase in traffic that will be coming in and going out.

Response: As discussed in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. However, HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street

extension that was to service these lots. Consequently, there are expected to be no impacts from traffic through the immediate neighborhood.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

As the Vice President of the Poha Nani Hui (resident members) I am concerned about the 20 homes to be built, resulting in the removal of most of the trees. We have a tranquil area now which will be affected by new noise. It appears that those lots & homes represent a windfall profit for Services Corp Intl and have nothing to do with running a cemetery.

Sincerely,

Name: Henry Lijedahl  
Address: 45-090 Namoku St # 1010  
City, State, Zip: Kaunohi, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Henry Lijedahl  
45-090 Namoku St. Apt. 1010  
Kaunohi, HI 96744

Dear Mr. Lijedahl:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kaunohi, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about the 20 homes to be built, resulting in the removal of most of the trees.

Response: As discussed in Section 4.7 of the Environmental Impact Statement (EIS), Flora, to replace the existing non-native forest, approximately 29.5 acres will be landscaped as part of the cemetery grounds with turf and scattered groupings of trees, and 11.4 acres will be revegetated with appropriate native plant material. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area. Hawaiian Memorial Park (HMP) has decided to eliminate the 20-lot residential subdivision and the Lipalu Street extension intended to service those lots. Instead, HMP will move forward with Alternative III, "Cemetery Only" as the preferred alternative and the Proposed Action.

2. Pohai Nani area is tranquil and will be affected by new noise.

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS and are summarized in the following paragraphs.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

3. Don't see the relationship with residential and cemetery uses.

Response: All landowners have the privilege of considering appropriate alternative uses for their property subject to the required land use approval process. It was appropriate for Hawaiian Memorial Park (HMP) to consider a consistent and modest extension of the existing residential land use surrounding its property. As you know, there are significant entitlement and development costs associated with this process. The opportunity to obtain a near term revenue source to help defray those costs is important to HMP. Nevertheless, as indicated above, the Petitioner has concluded through the EIS analysis that the 20-lot residential subdivision will not be constructed.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I'm deeply concerned and saddened that you're considering expanding Hawn Memorial Park. I've grown up in Kaneohe and have enjoyed the hillside that is my backyard. My concerns are the additional runoff from the homes and graveyard. All these years we have never had a problem with flooding. My children are upset at the fact that you will be tearing into the hillside. You will be taking away the forest and habitat of the wildlife. All your thinking about is making money for yourself. And not thinking about the Kaneohe community.

Sincerely,

→over

Name: Cindy DiBartolomeo  
Address: 45-218 Hikiwake St.  
City, State, Zip: Kaneohe HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

\* With this expansion there would be more traffic and congestion. The crime rate will increase and I would no longer feel safe in our neighborhood. I love the fact that our neighborhood is quiet. With the construction, 10 to 20 years of it, is too long. And not needed. If you are the largest International Cemetery, why expand. We Don't we rent the plots for 80 years ~~anyway~~? Why expand. All it comes down to is more money for you and your company. I work and live in Kaneohe. I look at the hillside everyday and I enjoy it. Maybe you should ~~live~~ live in Kaneohe and take a look at the hillside. ~~And~~ And enjoy.

October 8, 2008

Cindy DiBartolomeo  
45-218 Hikiwale St.  
Kāne'ohe, HI 96744

Dear Mrs. DiBartolomeo:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 11, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerns about the additional runoff from the homes and graveyard.

Response: The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

As a result of many comments received during the Draft Environmental Impact Statement (EIS) public comment period, the development program has been revised, and the 20-lot residential subdivision and the

associated road network, have been eliminated. Consequently the stormwater associated with the entire project has been reduced by 50%.

2. Loss of forest and habitat of wildlife.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering Ko'lea, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakihi, Pueo, and any of the alien bird species typically found in Windward O'ahu.

3. Increase in traffic and congestion.

Response: Although cemeteries typically have long usage periods of 40



to 50 years, overall visitor traffic generally remains stable over time because the frequency of visits by family or friends to a deceased's final resting place decline over the years as family members grow older or move away.

As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience.

The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. There are expected to be no impacts from traffic through the immediate neighborhood, as discussed in #1 above, the residential subdivision and the Lipalu Street extension have been eliminated from the development program.

4. Crime rate will increase.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

5. Noise

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS and are summarized below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

6. Rent plots for 80 years, why is expansion needed?

Response: HMP is a perpetual care cemetery. The grounds will be maintained in perpetuity. By contract, a person is interred forever at HMP, unless the family chooses to disinter to another cemetery. As discussed in Section 1.8 of the EIS, the Need for Action, HMP anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial services in Hawaii is a very real community service, and is in fact increasing. Hawaii's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial, and with the expected increase in numbers of burials associated with Hawaii's aging population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawaii, and will have significantly constrained inventory resources over the next five years. In order to continue to provide this service to the community, HMP must expand its ability to accommodate both casketed burials and niches.

7. Views of the hillside.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. As discussed in #1 above, HMP has modified the Proposed Action to include the Cemetery Only Alternative. The Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 11, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Regarding the proposed expansion of Hawaiian Memorial Park Cemetery, I am concerned about:  
Loss of forested area that holds water to feed our acquirers, controls run off and is home to many birds and insects. I personally have walked the ridge, visited the hee'au, and hiked throughout. I believe there is a strong possibility that endangered amakihi, Pueo, and seabirds may be present. The ancient historical sites should be preserved as a complex, not just as individual sites. (over) →

Sincerely,

Name: Patricia Gardner  
Address: 45-227 Koa Kahiko St  
City, State, Zip: Kaneohe, HI 96744

Cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

1111 - JULY 11, 2008  
Concerns (continued)

I believe the expansion will destroy the views that currently ~~exist~~ exist. I believe the expansion will ~~create~~ create problematic runoff and potential flooding. I'm worried about the impact of a new well on Kawa Stream.

The planning for a 10 year - 1 hour storm is ridiculously insufficient. The two 1x1 meter archeological digs were not<sup>a</sup> sufficient sample for a 56 acre parcel.

Above all, the precedence of ~~urban~~ rezoning conservation land for "urban" use is wrong. I believe that HMP only has their own greedy self interests at heart and have no regard for the Pikoioa neighborhood community.

Patricia Gardner  
45-227 Koa Kahiko St  
Kaneohe HI 96744

July 23, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Park  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford,

Regarding the Draft EIS that has been prepared for your proposed expansion of Hawaiian Memorial Cemetery, I am concerned about the statement that expanding the cemetery near existing homes will not have an adverse effect on property values.

I am a realtor with Coldwell Banker Pacific Properties and live in Pikoioa. I have extensive knowledge of property and neighborhoods all over the island. It is well known within the real estate industry that many cultures, particularly Asian cultures, have strong negative feelings about living close to a cemetery. Due to the large percentage of Buyers in Hawaii that are of Asian descent, there **IS** a negative impact on property value and pricing next to a cemetery.

Here are a few comments from long time realtors in senior positions within my company:

"Many people of Asian background are sensitive to living close to a cemetery, but so are many non-Asians."  
John R. Connelley (R) CRB, CRS, GRI  
Vice President - Coldwell Banker Pacific Properties

"Real estate is all about location...many do think near by cemetery is not a desirable feature. Those who are superstitious will absolutely stay away (many Asians)."  
Sandra Sakuma, (R)  
Sr. Vice President, Broker In Charge - Coldwell Banker Pacific Properties

"You will find that most all Asian cultures, especially the previous (our parents) generation will be leery and somewhat superstitious about being located near or next to a cemetery. I would even have to add that in general, all cultures, age groups and levels of education will have some uneasiness about being next to a cemetery, just because of how we were raised (ghost stories)."  
Leslie "Les" Kobata (R)  
Senior Vice President, Education and Development Center, Coldwell Banker Pacific Properties

My question to you is this: Upon what information do you base your assertion that the Hawaiian Memorial Cemetery expansion will not adversely affect the property values of surrounding homes?

Best regards,

*Patricia Gardner*

Patricia Gardner (RA) CHMS, ABR  
Coldwell Banker Pacific Properties

CC: Office of Environmental Quality Control, Dan Davidson - Land Use Commission, Helber, Hastert & Fee, Planners



October 8, 2008

Patricia Gardner  
45-227 Koa Kahiko St.  
Kāne'ohe, HI 96744

Dear Ms. Gardner:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letters dated July 11, 2008 and July 23, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Concerned about loss of forested area that holds water to feed aquifers, controls runoff.

Response: First, the Petition Area is not located in a forest reserve identified as an area affecting aquifers that are used as a source of drinking water. As discussed in the Environmental Impact Statement (EIS), impacts to groundwater resources are not anticipated. Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows." This includes the volume of water required for irrigation purposes.

To replace the non-native forest, approximately 29.5 acres will be landscaped as part of the cemetery grounds with turf and scattered groupings of trees and 11.4 acres will be revegetated with appropriate native plant material. As discussed in Section 6.4 of the EIS, retention areas are the preferred method to control storm water runoff. The



retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). Final drainage and grading plans must be reviewed and approved by DPP and the State Department of Health.

2. Loss of birds and insects; believe amakahi, pueo and snails may be present.

Response: As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. Given the location, elevation, and type of habitats available at this site, the absence of native land birds was not unexpected. No Federal threatened or endangered species, or species of concern were observed on the Petition Area. While the clearing of the area and its subsequent conversion to lawn habitat will reduce the immediate, local populations of alien birds, this will provide new foraging space for the wintering *Kōlea*, who forage in grassy areas with a good insect supply. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'Amakahi, Pueo, and any of the alien bird species typically found in Windward O'ahu. As noted in Section 4.8 of the EIS, the short-eared Owl or Pueo (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area.

In addition, a survey of native invertebrate resources for the Petition Area was conducted in August 2008, and the following language has been added to the Fauna section of the EIS:

"A survey of native invertebrate resources for the Petition Area was conducted in 2008 by Steven Lee Montgomery, Ph.D. The findings are summarized below and the complete report is attached to this FEIS as Appendix F. The primary purpose of the survey was to determine the presence or absence in the Petition Area of any endemic or indigenous

terrestrial invertebrates, especially any species with legal status under federal or state threatened and endangered species statutes.

The survey methodology included a general assessment of terrain and habitats after reviewing maps and prior reports. Surveying efforts were conducted by day and night to ensure a thorough survey. The property was traversed across all habitat types, alternately following established pathways to search for any native botanical resources and substitute host plant options for native invertebrates. The collection methods used were appropriate for terrestrial invertebrates for the terrain, botanical resources, and target species, and included: 1) host plant searches (visual inspection of resting sites and searching known feeding or breeding sites such as under dead bark); 2) use of sweep nets (a general method of censusing most flying and perching insects where a fine mesh net was swept across plants, leaf litter, etc. to sample any flying or perching insects); 3) visual observation (any visual evidence of arthropod presence or activity. Visual observations provide valuable evidence and are a cross check that extends the reach of sampling techniques); and 4) light sampling, which surveys insects active at night (using a bright light in front of a white cloth sheet).

The survey focused on finding any endemic and indigenous Hawaiian species. No attempt was made to collect or completely document the many common alien arthropod species present in the area. Three native species were encountered: the endemic bug *Trigonotylus hawaiiensis*, the endemic Moss moth (*Eudonia* sp.); and the endemic small moth or micro-moth (*Mesotrobos*). No native mollusks were observed and no invertebrate listed under either federal or state endangered species statutes was located. The extremely low level of native plants serving as arthropod hosts is most likely the reason for the absence of Hawaiian arthropods in the Petition Area."

To Section 4.8.2, Probable Impacts, the following language was added:

"No Federal or state listed endangered or threatened invertebrate species were found in the Petition Area; nor were any rare native Hawaiian invertebrate species observed. The few native Hawaiian invertebrates observed are widespread in distribution. The anticipated actions related to the Proposed Action are not expected to have a significant negative impact on an endemic or indigenous species. No part of the property is designated critical habitat for any threatened or endangered species."

3. Historical sites should be preserved as a complex.

Response: The statements about these sites being part of a whole complex are well taken, and they are included in the EIS as recommendations for the project.

As noted in the Draft EIS, Hawaiian Memorial Park (HMP) will follow all mitigation measures as recommended by both the Archaeological Inventory Survey (AIS) and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this regard, HMP has modified the development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This culture preserve will also include significant areas where the lau'ae fern is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

4. Believe the project will destroy the views that currently exist.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. We should also point out that HMP has modified the Proposed Action in two significant changes that will affect views of the property: (1) the 20-lot residential subdivision has been deleted from the development program; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'ewa'e Heiau.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. Overall, no views of any mountains or ridges will be obstructed by the project.

5. Runoff and potential flooding.

Response: As discussed in Section 6.4 of the EIS, retention areas are included in the Concept Plan as the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. Final drainage and grading plans must be reviewed and approved by DPP and the State Department of Health.

6. Worried about the impact of a new well on Kawa Stream.

Response: Please refer to the answer to Question #1 above, as impacts to groundwater are not anticipated.

7. Planning for a 10 year 1-hour storm is insufficient.

Response: Please refer to the answer to Question #5 above.

8. The two 1x1 meter archaeological digs were not a sufficient sample for a 56 acre parcel.

Response: The AIS was submitted to SHPD in April 2008, and a comment letter from SHPD relating to the AIS was received on September 22, 2008. The recommendation of the agency included four main points: (1) preservation of sites 354, 4684, 6932, and 6931 as a complex, not individually; (2) no relocation of the grinding stone; (3) consultation with ethnic organizations or members of a group for whom some of the historic properties may have significance, as well as with OHA; and (4) appropriate additional testing of the area to be developed as determined via communication with SHPD. All of the recommendations of SHPD will be followed, and the AIS will be revised accordingly and resubmitted for review and concurrence.

Questions from Letter #2 of July 23, 2008

9. I am concerned about the statement that expanding the cemetery near existing homes will not have an adverse effect on property values.

Response: Cemeteries are excellent neighbors due to the hours of operation and the beautiful quiet setting and nature of the use. Many very high value residential neighborhoods are located adjacent to cemeteries throughout the country, and on O'ahu. There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community and people have accepted them as neighbors. This is also the case for Hawaiian Memorial Park (HMP). In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. On average, property values and home sale prices are not any lower for the Parkview neighborhood than for the Pikoioa neighborhood. Additionally, some studies that examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price. This is especially true when the cemetery is not visible, which, as discussed and shown in several figures in the EIS, it will not be.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



**KAILUA NEIGHBORHOOD BOARD NO. 31**

PO BOX 487 • KAILUA, HAWAII 96754  
PHONE: (808) 687-4749 • FAX: (808) 697-5760 • INTERNET: www.cs.hawaii.edu/ku31

July 15, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

RE: Hawaiian Memorial Park Cemetery Expansion Draft Environmental Impact Statement

At the July 3, 2008 Kailua Neighborhood Board meeting the members present voted unanimously in support of the following motion.

**The Kailua Neighborhood Board opposes the proposed Hawaiian Memorial Park Expansion in Kaneohe because it is not consistent with the Ko'olaupoko Sustainable Communities Plan, requires conversion of conservation land to urban use and for other reasons.**

Reasons for opposition:

1. The Ko'olaupoko Sustainable Communities Plan (KSCP) excludes lands that are within the State Conservation District which is not supposed to be altered until at least the year 2020.
2. Project is part of Oneawa Hills area which KSCP policy states should be specifically excluded from the Urban Community Boundary.
3. The Urban Community Boundary is intended to confine most new development to "infill" sites within existing urbanized areas and to prohibit continuous sprawl.
4. Most of the project has slopes more than 20%. Housing will occur on areas with slopes from 0-20% and 20-30% and >30%.
5. There are four areas with the potential for hazard due to rock fall. One is located adjacent/above 20 residential lots.
6. Project site is a natural forest area that acts as a watershed and recharge area.
7. Affordable housing options include "construction of dwelling units elsewhere or payment of an in-lieu fee."
8. Petitioner will provide in-lieu payment for fair market value of the 7,000 sq. ft. required park and playground space based on proposed 20 residential lot development.
9. There is not a dedicated water source for the houses and proposed restroom.
10. Kawa Stream is identified as an "impaired waterway" under the Federal Clean Water Act. Currently Hawaiian Memorial Park (HMP) is a major contributor to pollution to the stream and further expansion will increase runoff into Kawa Stream and eventually Kaneohe Bay.
11. Increased impervious surfaces will reduce rainwater infiltration into the underlying aquifer.
12. Homes adjacent to HMP currently experience flooding from vegetated hillside now because of inadequate drainage. There was a mud slide in the 1980's that ran through people's homes and killed one person.
13. Development will adversely impact the cultural and historical complex. The following sites have been identified in and near the petition area so far.  
Sites in petition area

- #4680 historic
  - #4683 historic
  - #4684 pre-contact
  - #4686 historic
  - #6930 pre-contact
  - #6931 pre-contact
  - #6932 historic
  - #6933 historic
- Sites near petition area:
- #345 pre-contact – Kawa'ewa'e Heiau, listed on the National Register of Historic Places,
  - #4681 pre-contact
  - #6929 pre-contact
  - #6931 pre-contact

If you have any questions please contact Donna Wong, Chair Planning, Zoning and Environment Committee at 261-8292.

Sincerely,

Charles Prentiss  
Chair

CC  
Land Use Commission  
Helber Hastert & Fee



October 8, 2008

Chuck Prentiss  
Chair  
Kailua Neighborhood Board  
PO Box 487  
Kailua, HI 96734

Dear Chair Prentiss:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaiʻi

Thank you for your letter dated July 15, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The Kailua Neighborhood Board opposes the proposed Hawaiian Memorial Park Expansion in Kaneohe because it is not consistent with the Koʻolaupoko Sustainable Communities Plan, requires conversion of conservation land to urban use and for other reasons. The Koʻolaupoko Sustainable Communities Plan (KSCP) excludes lands that are within the State Conservation District which is not supposed to be altered until at least the year 2020. Project is part of Oneawa Hills area which KSCP policy states should be specifically excluded from the Urban Community Boundary.

Response: As discussed in the EIS, the Petitioner understands that the proposed project is not in conformance with the existing Koʻolau Poko Sustainable Communities Plan (SCP), and the project will require an amendment to the Koʻolau Poko SCP. While the Koʻolau Poko SCP states that the urban growth boundaries should remain fixed through the year 2020, this SCP is only a guidance document. Mechanisms exist for requesting changes (an amendment) to any SCP, which is what the Petitioner plans to do. Also, the SCPs are mandated to be reviewed and updated every five years (Sec. 24-6.10 of Ordinance 00-47). During this update, all existing language and land use maps are open to revision.



2. Section 3.2.2, Koʻolau Poko SCP, of the EIS explains the conformance with the SCP and potential options for this amendment.
2. The Urban Community Boundary is intended to confine most new development to "infill" sites within existing urbanized areas and to prohibit continuous sprawl.
- Response: Please see answer to Question #1 above for discussion of the Koʻolau Poko SCP changes.
3. Most of the project has slopes more than 20%. Housing will occur on areas with slopes from 0-20% and 20-30% and >30%.

Response: The EIS discloses the information about slope stability in Section 4.6 and in Appendix B, the Report Assessment of Hazard from Rockfall and Slope Stability. Most of the land within the Petition Area will be graded to provide suitable areas for gravesites and residential development, generally sloped at 20% or less. Areas exceeding 25 percent slope are not suitable for land burial use. The slope stability analysis determined that there is no apparent potential for hazards to the Petition Area that may be associated with slope stability. The factor of safety for the existing slopes and newly graded slopes exceeds 1.5 (the generally accepted minimum factor of safety). Therefore no mitigative measures are deemed necessary to protect the area from slope stability issues. The residential portion of the project will not occur, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.

4. There are four areas with the potential for hazard due to rock fall. One is located adjacent/above 20 residential lots.
- Response: The EIS discloses information about rockfall hazards, both in Section 4.6 and in Appendix B, the Report Assessment of Hazard from Rockfall and Slope Stability. Mitigative measures for rockfall hazards may include one or a combination of the following: Securing existing boulders using netting or chaining; Removal of the boulders; Installation of fencing uphill from proposed improvements; or Constructing a buffer zone between the rockfall hazard source and the proposed improvement. The choice of mitigative measure will depend on the specific site conditions. The elimination of the 20-lot residential subdivision is discussed above.
5. Project site is a natural forest area that acts as a watershed and recharge area.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area.

Finally, groundwater beneath the Petition Area is not utilized for domestic purposes by the Board of Water Supply.

6. Affordable housing options include "construction of dwelling units elsewhere or payment of an in-lieu fee."

Response: Since the project will not longer include residential lots, the affordable housing requirements are no longer applicable to this project.

7. Petitioner will provide in-lieu .payment for fair market value of the 7,000 sq ft. required park and playground space based on the proposed 20 residential lot development.

Response: Since the project will not longer include residential lots, the park dedication requirements are no longer applicable to this project.

8. There is not a dedicated water source for the houses and proposed restroom.

Response: There will be no need for new domestic water sources for the project, as the project will no longer include residential lots. If needed, the project will extend a small line that uses the exiting 5/8 inch water meter, into the expansion area for a drinking fountain and restroom.

9. Kawa Stream is identified as an "impaired waterway" under the Federal Clean Water Act. Currently Hawaiian Memorial Park (HMP) is a major contributor to pollution to the stream and further expansion will increase runoff into Kawa Stream and eventually Kaneohe Bay.

Response: Retention areas are the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the Petition Area will not increase from current levels. A detailed analysis of Total Maximum Daily Load (TMDL) allocations for Kawa Stream shows that the proposed retention system that has been developed to satisfy the City and County of Honolulu's design storm event, will capture all of the runoff generated by the daily rainfall events used to generate the Kawa Watershed TMDLs. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawa Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

10. Increased impervious surfaces will reduce rainwater infiltration into the underlying aquifer.

Response: Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows." We would also like to point out that with the elimination of the 20-lot residential subdivision and the creation of the 9.4-acre cultural preserve (another important project modification), 51.7 acres (91.5%) of the 56.5-acre Petition Area will be retained in impervious open space at full build.

11. Homes adjacent to HMP currently experience flooding from vegetated hillside now because of inadequate drainage. There was a mud slide in the 1980s that ran through people's homes and killed one person.

Response: First, we want you to know that we are aware of the flooding concerns in the nearby neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events.

It is important to understand the physical characteristics that could be influencing these previous flooding events in the neighborhood. The Pikoioa Tract 10 subdivision was approved by the City and County of Honolulu in 1964. As part of the subdivision, the vast majority of parcels along the eastern sides of Nāmoku and Ohāhā Streets are encumbered by an easement for slope and drainage purposes (Figure 18 of the Draft EIS). These parcels typically are level from the front property line toward the rear of the property, rendering from 1/3 to 1/2 of the property unbuildable because of the slope and the easement, even though the property is zoned for residential use.

The drainage system for these properties was designed as a series of interceptor ditches cut into the slope. These ditches were lined with concrete and extend across all parcels in this system, intending to direct sheet flow to underground storm drains, which eventually empty into Kāwa Stream. The responsibility to maintain these interceptor ditches was left to each individual property owner. As a consequence, there is a wide range of maintenance quality. Inspection of several homes indicated some owners keep their interceptor ditches free of silt, debris, and vegetation. Other property owners have not kept a maintenance protocol, and ditches are overgrown with trees, shrubs, and other vegetation, and are full of soil, incapable of performing their designed function. It is probable there are several factors contributing to flooding occurrences in this neighborhood: (1) slope profile characteristics of each property; (2) design of the interceptor ditch system; (3) uneven maintenance protocol for the entire system.

The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). HMP will adhere strictly to these requirements, which are applicable to all new developments on O'ahu.

12. Development will adversely impact the cultural and historical complex.

Response: The statements about these sites being part of a whole complex are well taken. As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawā'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, as noted above, the project will establish a cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawā'ewa'e Heiau and Site 6931 and also include significant areas where the lau'e fern is found to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

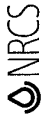
Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Natural Resources Conservation Service  
P.O. Box 50004 Rm. 4-118  
Honolulu, HI 96850  
808-541-2600

July 16, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd  
1330 Maunakea Street, Honolulu, HI 696831

**Subject:** USDA- NRCS Review of Hawaiian Memorial Park Cemetery Expansion, Draft Environmental Impact Statement.

Dear Mr. Morford,

Thank you for providing the NRCS the opportunity to review the Draft Environmental Impact Statement for the Hawaiian Memorial Park Expansion. Please find enclosed the NRCS Soil Survey Map, soil reports, and a map indicating areas of Important Farmlands. The important Farmlands map has been enclosed for your aid in determining if a Farmland Impact Conversion Rating Form (AD-1006) is needed for this project. Typically, this form is required on projects that convert farmlands into non-farmland uses, and have federal dollars attached to the project. See the website link below for more information on the Farmland Protection Policy Act, and a copy of the AD-1006 form, with instructions. The soil mapping does not identify any hydric soils in this project area. Hydric soils identify potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corp of Engineers 404 permit.

The enclosed Soil Survey Map identifies all soil map units in the project area. The soil reports provide selected soil properties and interpretations, e.g., limitations for roads, and small commercial buildings, soil layers with USDA textures, and engineering classifications. The limitation ratings for the selected uses, small commercial buildings and local roads and streets, are severe and very limited respectively, excluding soil map unit KqB, which has a moderate rating for small commercial buildings. These ratings do not preclude the intended land use, however they do identify potential limitations for the use, which may require corrective measures, increase costs, and/or require continued maintenance.

The NRCS Soil Survey is a general planning tool and does not eliminate the need for an onsite investigation. If you have any questions concerning the soils or interpretations for this project please call, Tony Rolles, Assistant State Soil Scientist, (808) 541-2600 x129, or email, [Tony.Rolles@hi.usda.gov](mailto:Tony.Rolles@hi.usda.gov).

Hawaiian Memorial Park Cemetery Expansion, Draft Environmental Impact Statement  
Page 2

NRCS - Farmland Protection Policy Act Website:  
<http://www.nrcs.usda.gov/programs/fppa/>

Sincerely,

LAWRENCE T. YAMAMOTO  
Director  
Pacific Islands Area

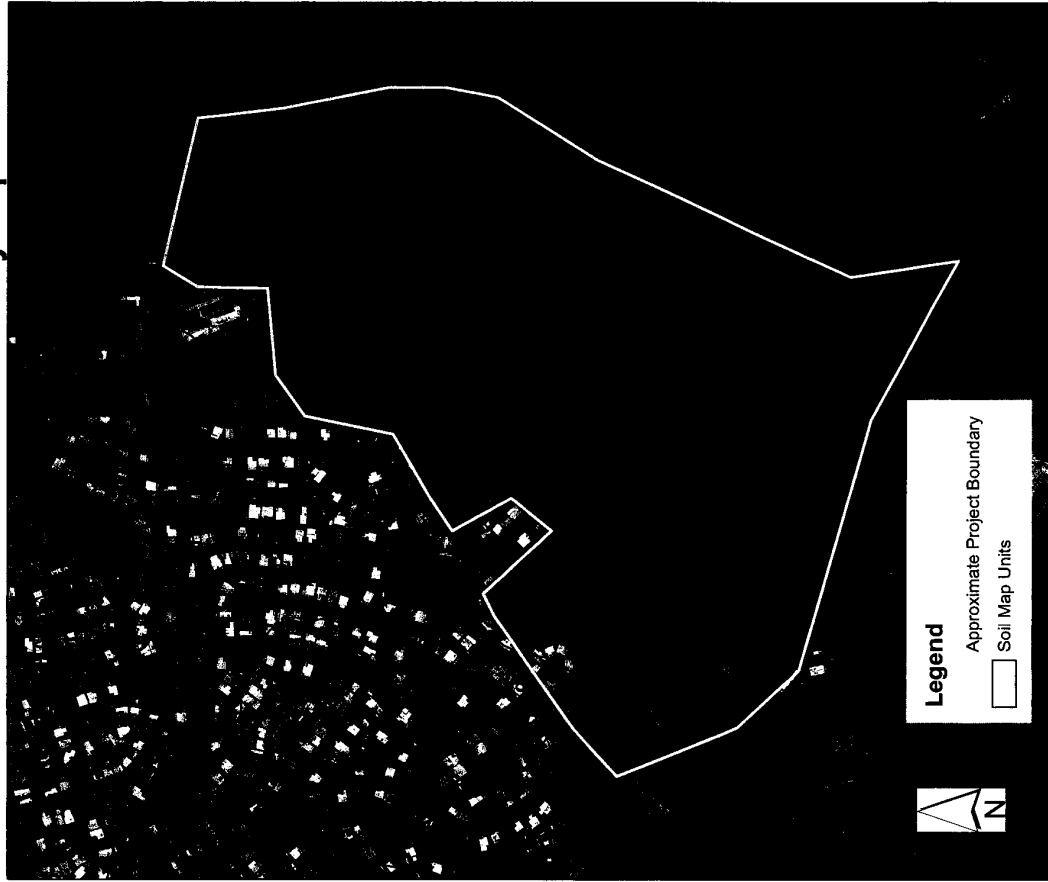
cc: Michael Robotham, Assistant Director for Soil Science and Natural Resource Assessments, USDA-NRCS, Honolulu, HI  
Orlando, Davidson, Land Use Commission, Honolulu, HI  
Rachael Edinger, Project Planner, Helber Hastert & Fee, Planners, Honolulu, HI  
The Office of Environmental Quality Control, Honolulu, HI

Enclosures:



# SOILS MAP

## Hawaiian Memorial Park Cemetery Expansion



# Important Farmlands

## Hawaiian Memorial Park Cemetery Expansion



**Legend**  
Approximate Project Boundary

**Important Farmlands**  
**AGTYPE**

- Unclassified
- Prime Farmlands
- Unique Farmlands
- Statewide Important Farmlands

0 280 560 1,120 1,680 2,240 Feet  
NRCS  
6/2008

0 280 560 1,120 1,680 2,240 Feet  
NRCS  
6/2008

### Map Unit Legend

Island of Oahu, Hawaii

Map symbol	Map unit name
AeE	Alaaloa silty clay, 15 to 35 percent slopes
ALF	Alaaloa silty clay, 40 to 70 percent slopes
HLMG	Helemano silty clay, 30 to 80 percent slopes
KgB	Kaneohe silty clay, 3 to 8 percent slopes
KgC	Kaneohe silty clay, 8 to 15 percent slopes
KHOF	Kaneohe silty clay, 30 to 65 percent slopes

### Selected Soil Interpretations

Island of Oahu, Hawaii

[The information in this table indicates the dominant soil condition but does not eliminate the need for onsite investigation. The table shows only the top five limitations for any given soil. The soil may have additional limitations]

\*This soil interpretation was designed as a "limitation" as opposed to a "suitability". The numbers in the value columns range from 0.01 to 1.00. The larger the value, the greater the potential limitation.

Map symbol and soil name	Pct of map unit	ENG - Small Commercial Buildings (H1) *		ENG - Shallow Excavations (H1) *		ENG - Dwellings w/o Basements (H1) *	
		Rating class and limiting features	Value	Rating class and limiting features	Value	Rating class and limiting features	Value
AeE: Alaaloa	100	Severe Slopes > 8%	1.00	Severe Slopes > 15% Clay from 40 to 60% Caving potential is low	1.00 0.98 0.10	Severe Slopes > 15%	1.00
ALF: Alaaloa	100	Severe Slopes > 8%	1.00	Severe Slopes > 15% Clay from 40 to 60% Caving potential is low	1.00 0.98 0.10	Severe Slopes > 15%	1.00
HLMG: Helemano	100	Severe Slopes > 8%	1.00	Severe Slopes > 15% Clay from 40 to 60% Caving potential is low	1.00 0.50 0.10	Severe Slopes > 15%	1.00
KgB: Kaneohe	100	Moderate Slopes are from 4 to 8%	0.50	Moderate Clay from 40 to 60% Caving potential is low	0.50 0.10	Slight	
KgC: Kaneohe	100	Severe Slopes > 8%	1.00	Moderate Slopes 8 to 15% Clay from 40 to 60% Caving potential is low	0.63 0.50 0.10	Moderate Slopes 8 to 15%	0.57
KHOF: Kaneohe	100	Severe Slopes > 8%	1.00	Severe Slopes > 15% Clay from 40 to 60% Caving potential is low	1.00 0.50 0.10	Severe Slopes > 15%	1.00

## Roads and Streets, Shallow Excavations, and Lawns and Landscaping

Island of Oahu, Hawaii

[The information in this table indicates the dominant soil condition but does not eliminate the need for onsite investigation. The numbers in the value columns range from 0.01 to 1.00. The larger the value, the greater the potential limitation. The table shows only the top five limitations for any given soil. The soil may have additional limitations.]

Map symbol and soil name	Pct. of map unit	Local roads and streets		Shallow excavations		Lawns and landscaping	
		Rating class and limiting features	Value	Rating class and limiting features	Value	Rating class and limiting features	Value
AeE: Alaiea	100	Very limited Slope	1.00	Very limited Slope	1.00	Very limited Slope	1.00
		Low strength	1.00	Too clayey	0.98	Too clayey Slope	1.00
				Cutbanks cave	0.10		
ALF: Alaiea	100	Very limited Slope	1.00	Very limited Slope	1.00	Very limited Slope	1.00
		Low strength	1.00	Too clayey	0.98	Too clayey Slope	1.00
				Cutbanks cave	0.10		
HLMG: Helemano	100	Very limited Slope	1.00	Very limited Slope	1.00	Very limited Slope	1.00
		Low strength	0.10	Too clayey	0.50	Too clayey Large stones content	0.03
				Cutbanks cave	0.10		
KgB: Kaneohe	100	Very limited Low strength	1.00	Somewhat limited Too clayey	0.50	Very limited Too clayey	1.00
				Cutbanks cave	0.10		
KgC: Kaneohe	100	Very limited Low strength Slope	1.00	Somewhat limited Slope	0.63	Very limited Too clayey Slope	1.00
				Too clayey	0.50	Too clayey Slope	0.63
				Cutbanks cave	0.10		
KHOF: Kaneohe	100	Very limited Slope	1.00	Very limited Slope	1.00	Very limited Slope	1.00
		Low strength	1.00	Too clayey	0.50	Too clayey	1.00
				Cutbanks cave	0.10		

## Water Features

Island of Oahu, Hawaii

Map symbol and soil name	Hydrologic group	Surface runoff	Month	Water table			Flooding
				Upper limit	Lower limit	Surface depth	
AeE: Alaiea	B	Medium	Jan-Dec	---	---	---	None
ALF: Alaiea	B	Medium	Jan-Dec	---	---	---	None
HLMG: Helemano	B	Medium	Jan-Dec	---	---	---	None
KgB: Kaneohe	B	Medium	Jan-Dec	---	---	---	None
KgC: Kaneohe	B	Medium	Jan-Dec	---	---	---	None
KHOF: Kaneohe	B	High	Jan-Dec	---	---	---	None

## Soil Features

Island of Oahu, Hawaii

Map symbol and soil name	Restrictive layer				Subsidence		Potential for frost action	Risk of corrosion	
	Kind	Depth to top	Thickness	Hardness	Initial	Total		Uncoated steel	Concrete
AeE:		<i>In</i>	<i>In</i>		<i>In</i>	<i>In</i>			
Alaeloa	---	---	---	---	0	---	None	High	Moderate
ALF:									
Alaeloa	---	---	---	---	0	---	None	High	Moderate
HLMG:									
Helemano	---	---	---	---	0	---	None	High	Moderate
KgB:									
Kaneohe	---	---	---	---	0	---	None	High	Moderate
KgC:									
Kaneohe	---	---	---	---	0	---	None	High	Moderate
KHOF:									
Kaneohe	---	---	---	---	0	---	None	High	Moderate

## Engineering Properties

Island of Oahu, Hawaii

Map symbol and soil name	Depth	USDA texture	Classification		Fragments		Percent passing sieve number--				Liquid limit	Plasticity index
			Unified	AASHTO	>10 Inches	3-10 Inches	4	10	40	200		
AeE:	<i>In</i>				<i>Pct</i>	<i>Pct</i>					<i>Pct</i>	
Alaeloa	0-10	Silty clay	MH-O (propose d)	A-7	0	0-5	95-100	95-100	90-100	85-100	50-80	20-30
	10-18	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-30
	18-29	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-40
	29-48	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-30
	48-58	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-10	90-100	90-100	90-100	90-100	50-80	20-30
	58-70	Stony silty clay	MH-O (propose d)	A-7	5-15	5-15	65-85	60-80	55-80	50-75	50-70	20-30

## Engineering Properties

Island of Oahu, Hawaii

Map symbol and soil name	Depth	USDA texture	Classification		Fragments		Percent passing sieve number--				Liquid limit	Plasticity index
			Unified	AASHTO	>10 Inches	3-10 Inches	4	10	40	200		
		<i>In</i>			<i>Pct</i>	<i>Pct</i>					<i>Pct</i>	
ALF: Alaeloa	0-10	Silty clay	MH-O (propose d)	A-7	0	0-5	95-100	95-100	90-100	85-100	50-80	20-30
	10-18	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-30
	18-29	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-40
	29-48	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-5	95-100	95-100	95-100	90-100	50-80	20-30
	48-58	Silty clay, Silty clay loam	MH-O (propose d)	A-7	0	0-10	90-100	90-100	90-100	90-100	50-80	20-30
	58-70	Stony silty clay	MH-O (propose d)	A-7	5-15	5-15	65-85	60-80	55-80	50-75	50-70	20-30
HLMG: Helemano	0-10	Silty clay	MH-K (propose d)	A-7	0-5	0-10	95-100	95-100	90-100	85-95	55-60	20-25
	10-41	Paragravelly silty clay	MH-K (propose d)	A-7	0-10	0-10	80-100	80-90	75-90	70-85	55-60	20-25
	41-60	Very paragravelly silty clay	MH-K (propose d)	A-7	5-20	5-20	70-90	70-80	65-80	65-75	55-60	20-25

## Engineering Properties

Island of Oahu, Hawaii

Map symbol and soil name	Depth	USDA texture	Classification		Fragments		Percent passing sieve number--				Liquid limit	Plasticity index
			Unified	AASHTO	>10 Inches	3-10 inches	4	10	40	200		
		<i>In</i>			<i>Pct</i>	<i>Pct</i>					<i>Pct</i>	
KgB: Kaneohe	0-14	Silty clay	MH-K (propose d)	A-7	0	0	95-100	95-100	95-100	85-100	60-70	20-30
	14-60	Silty clay	MH-K (propose d)	A-7	0	0-5	85-95	75-95	75-95	70-95	60-70	20-30
KgC: Kaneohe	0-14	Silty clay	MH-K (propose d)	A-7	0	0	95-100	95-100	95-100	85-100	60-70	20-30
	14-60	Silty clay	MH-K (propose d)	A-7	0	0-5	85-95	75-95	75-95	70-95	60-70	20-30
KHOF: Kaneohe	0-10	Silty clay	MH-K (propose d)	A-7	0	0	95-100	95-100	95-100	85-100	60-70	20-30
	10-60	Silty clay	MH-K (propose d)	A-7	0	0-5	85-95	75-95	75-95	70-95	60-70	20-30

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Lawrence T. Yamamoto  
Director  
Pacific Islands Area  
Natural Resources Conservation Service  
P.O. Box 50004 Rm. 4-118  
Honolulu, HI 96850

Dear Mr. Yamamoto:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 16, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Please find enclosed the NRCS Soil Survey Map, soil reports, and a map indicating areas of Important Farmlands. The Important Farmlands map has been enclosed for your aid in determining if a Farmland Impact Conversion Rating Form (AD-i.006) is needed for this project. Typically, this form is required on projects that convert farmlands into non-farmland uses, and have federal dollars attached to the project.  
  
Response: Thank you for the soil map, soil reports and farmland map. Because our project does not involve farmlands and does not have federal dollars attached to the project, we will not need to use the Farmland Impact Conversion Rating Form.
2. The soil mapping does not identify any hydric soils in this project area. Hydric soils identify potential areas of wetlands. If wetlands do exist, any proposed impacts to these wetlands would need to demonstrate compliance with the "Clean Water Act", and may need an Army Corp of Engineers 404 permit.

Response: A botanical survey of the Petition Area was conducted in September 2006, with follow up field work on August 24, 2008. No evidence of wetlands were identified during the course of this effort.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
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Mr. Lawrence T. Yamamoto  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
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3. The enclosed Soil Survey Map identifies all soil map units in the project area. The soil reports provide selected soil properties and interpretations, e.g., limitations for roads, and small commercial buildings, soil layers with USDA textures, and engineering classifications. The limitation ratings for the selected uses, small commercial buildings and local roads and streets, are severe and very limited respectively, excluding soil map unit KgB, which has a moderate rating for small commercial buildings. These ratings do not preclude the intended land use, however they do identify potential limitations for the use, which may require corrective measures, increase costs, and/or require continued maintenance.

Response: We note that the soils in the Petition Area do not preclude the intended land use and the potential limitations for the use will be carefully considered in all plans for the project.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control  
Michael Robotham, NRCS, Honolulu, HI

LINDA LINGLE  
Governor

JAMES R. AONA, JR.  
Lieutenant Governor

THEODORE E. LIU  
Director

MARK K. ANDERSON  
Deputy Director



LAND USE COMMISSION  
Department of Business, Economic Development & Tourism  
State of Hawaii

ORLANDO "DAN" DAVIDSON  
Executive Officer

SANDRA M. MATSUSHIMA  
Chief Clerk

BERT K. SARUWATARI  
Senior Planner

MICHAEL A. MURPHY  
Planner

FRED A. TALON  
Drafting Technician

July 16, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Docket No. A07-777  
Draft Environmental Impact Statement (DEIS)  
Hawaiian Memorial Park Cemetery Expansion  
Kaneohe, Oahu, Hawaii  
Tax Map Key: 4-5-33: por. 1

We have reviewed the subject DEIS for the proposed development and have the following comments:

- 1) In accordance with section 11-200-17(f), Hawaii Administrative Rules (HAR), alternatives to the proposed action should be described in a separate and distinct section. We acknowledge that section 8.0 of the DEIS includes a discussion on alternatives; however, we request that the discussion be supplemented to specifically address the reasons why each alternative was rejected, if, in fact, they were rejected. To this end, the analysis should be sufficiently detailed to allow a comparative evaluation (both qualitatively and quantitatively) of the proposed development and each alternative. We also request that alternative locations for the proposed development be discussed.
- 2) In accordance with section 11-200-17(g), HAR, the population and growth assumptions used to justify the need for the proposed development should be provided. We acknowledge that the DEIS includes a market need assessment for the cemetery expansion; however, we note there is no corresponding assessment for the residential portion of the development. We previously pointed out this omission in our initial review of the Petition.
- 3) In accordance with section 11-200-17(h), HAR, the status of each identified approval should be described. Therefore, we request that to the extent possible the *projected* submittal dates (i.e., by month/year) of the applications and plans for approval to the various agencies be provided.

Mr. Jay Morford  
July 16, 2008  
Page 2

- 4) In accordance with section 11-200-17(i), HAR, the probable impact of the proposed action on the environment shall be included. Review of the DEIS indicates that no inventory and assessment of arthropods on the subject property was conducted. Although the location of the subject property may not require that a comprehensive arthropod study be conducted, we request that this matter be addressed in the interest of full environmental disclosure.

We also note that the DEIS contains statements relative to the proposed development's impacts upon the air quality and ambient noise levels of the area; however, there are no studies in the DEIS on which these conclusions are based. Given the technical and scientific nature of these issues, it has been customary to assess existing conditions and potential impacts and mitigation measures based on studies conducted by experts in the respective fields. As such, we request that, at a minimum, the statements be affirmed by acknowledged experts in the fields in question. In the alternative, the statements should be comprehensively supported by published studies that have addressed the impacts upon air quality and ambient noise levels from projects on Oahu that are similar to the proposed development.

We also request that the specific measures that will be undertaken to design and construct structures within the proposed development that conserve natural resources and are energy efficient be described. A discussion on the existing civil defense conditions and potential impacts and proposed mitigation measures should also be included.

In addition, we request that the discussion on solid waste (section 6.5) clarify the destination of the refuse generated during construction of the development and by the proposed residences. In this discussion, please reference the current plans of the City and County of Honolulu Department of Environmental Services to expand the Waimanalo Gulch Sanitary Landfill by another approximately 92.5 acres.

Finally, we acknowledge that the proposed development will generate revenues to the State and the City and County of Honolulu via increased personal income and general excise taxes and real property taxes, respectively. However, we request that an analysis be provided of the projected expenses that would be incurred by the State and City and County governments to support the proposed development. The analysis of governmental operating expenditures should include, but not be limited to, the following areas: roadways (improvements and maintenance), higher/lower education, public safety, health and sanitation, human services, recreation, debt service, and government employee benefits.

- 5) In accordance with section 11-200-17(m), HAR, mitigation measures proposed to avoid, minimize, rectify, or reduce impact should be considered. Included in this discussion are the timing of each step proposed to be taken in the mitigation process and other provisions to assure that the mitigation measures will, in fact, be taken. We note that it is the contention of the petitioner that traffic mitigation measures are warranted with or without the proposed development. Given this assertion, the petitioner should clarify its role in contributing to its fair-share of traffic improvements and a projected timeframe for implementing such improvements in the process.

October 8, 2008

6) In accordance with section 11-200-17(n), HAR, unresolved issues associated with the proposed action should be discussed. To the extent that the specific method by which the petitioner will satisfy the City and County of Honolulu's affordable housing opportunities is yet to be identified at this time and will be determined by negotiation, we request that the matter be included within the *Unresolved Issues* section of the Final EIS.

7) We request that the relationship between the proposed cemetery expansion and the 20-lot residential development be further clarified inasmuch as these uses appear to be unconnected. Clarification should also be provided on the extent of Hawaiian Memorial Life Plan, Ltd.'s, experience in developing residential projects. A discussion of these matters is needed particularly given the lack of a market study for the residential lots and the admitted viability of the all cemetery use alternative.

8) In the DEIS, there are numerous references to the term *potable water*. We request that it be replaced by the term *drinking water*. We have been advised that although potable water has generally been used to mean drinking water, the Department of Health (DOH) uses the latter term specifically to indicate water for human consumption that is derived from surface water and/or groundwater and is regulated by the DOH pursuant to chapter 11-20, HAR.

We have no further comments to offer at this time. Thank you for the opportunity to comment on the subject DEIS.

Should you have any questions, please feel free to call me or Bert Saruwatari of our office at 587-3822.

Sincerely,



ORLANDO DAVIDSON  
Executive Officer

c: Office of Environmental Quality Control  
✓ Rachael Edinger



Orlando Davidson  
Executive Officer  
State of Hawaii  
Department of Business, Economic Development & Tourism  
Land Use Commission  
PO Box 2359  
Honolulu, HI 96804

Dear Mr. Davidson:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 16, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. In accordance with section 11-200-17(f), Hawaii Administrative Rules (HAR), alternatives to the proposed action should be described in a separate and distinct section. We acknowledge that section 8.0 of the DEIS includes a discussion on alternatives; however, we request that the discussion be supplemented to specifically address the reasons why each alternative was rejected, if, in fact, they were rejected. To this end, the analysis should be sufficiently detailed to allow a comparative evaluation (both qualitatively and quantitatively) of the proposed development and each alternative. We also request that alternative locations for the proposed development be discussed.

Response: Chapter 8.0 of the Final EIS includes more detailed analysis and information (qualitative and quantitative) on each alternative, and discussion of an alternative location has been included as well.

2. In accordance with section 11-200-17(g), HAR, the population and growth assumptions used to justify the need for the proposed development should be provided. We acknowledge that the DEIS includes a market need assessment for the cemetery expansion; however, we note there is no



corresponding assessment for the residential portion of the development. We previously pointed out this omission in our initial review of the Petition.

Response: The Final EIS includes some additional language discussing the market need for residential development in the Kāneʻohe region. Nevertheless, the residential portion of the Proposed Action will not be built, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.

3. In accordance with section 11-200-17(h), HAR, the status of each identified approval should be described. Therefore, we request that to the extent possible the *projected* submittal dates (i.e., by month/year) of the applications and plans for approval to the various agencies be provided.

Response: Section 1.7 of the Final EIS includes the projected submittal dates of the applications and plans for approval.

4. In accordance with section 11-200-17(i), HAR, the probable impact of the proposed action on the environment shall be included. Review of the DEIS indicates that no inventory and assessment of arthropods on the subject property was conducted. Although the location of the subject property may not require that a comprehensive arthropod study be conducted, we request that this matter be addressed in the interest of full environmental disclosure.

Response: A survey of native invertebrate resources for the Petition Area was conducted in August 2008 by Steven Lee Montgomery, Ph.D. The results of the survey are included in Section 4.8 of the Final EIS, and the report is attached as Appendix F.

5. We also note that the DEIS contains statements relative to the proposed development's impacts upon the air quality and ambient noise levels of the area; however, there are no studies in the DEIS on which these conclusions are based. Given the technical and scientific nature of these issues, it has been customary to assess existing conditions and potential impacts and mitigation measures based on studies conducted by experts in the respective fields. As such, we request that, at a minimum, the statements be affirmed by acknowledged experts in the fields in question. In the alternative, the statements should be comprehensively supported by published studies that have addressed the impacts upon air quality and ambient noise levels from projects on Oahu that are similar to the proposed development.

Response: A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS. The full review is included as Appendix I in the Final EIS. An air quality review for the Proposed Action was conducted in September 2008 by B.D. Neal & Associates, and their findings have been incorporated in Section 4.11 of the Final EIS. The full review is included as Appendix H in the Final EIS.

6. We also request that the specific measures that will be undertaken to design and construct structures within the proposed development that conserve natural resources and are energy efficient be described.

Response: The Final EIS (in Section 3.1.1 under Hawai'i State Plan Section 226-15 and 226-16, and in Section 6.6, Power and Communication) includes descriptions of the various water and energy conservation strategies to be employed as part of the project.

7. A discussion on the existing civil defense conditions and potential impacts and proposed mitigation measures should also be included.

Response: Section 4.6 of the Final EIS has added information pertaining to the existing conditions and probable impacts to civil defense conditions.

8. In addition, we request that the discussion on solid waste (section 6.5) clarify the destination of the refuse generated during construction of the development and by the proposed residences. In this discussion, please reference the current plans of the City and County of Honolulu Department of Environmental Services to expand the Waimanalo Gulch Sanitary Landfill by another approximately 92.5 acres.

Response: Section 6.5 of the Final EIS has added information on the destination of the solid waste, but has not included information on the current expansion plans by the City and County related to the Waimanalo Landfill because with the deletion of the residential subdivision from the Proposed Action, there will be no impact on non-combustible solid waste generated on O'ahu.

9. Finally, we acknowledge that the proposed development will generate revenues to the State and the City and County of Honolulu via increased personal income and general excise taxes and real property taxes, respectively. However, we request that an analysis be provided of the projected expenses that would be incurred by the State and City and

County governments to support the proposed development. The analysis of governmental operating expenditures should include, but not be limited to, the following areas: roadways (improvements and maintenance), higher/lower education, public safety, health and sanitation, human services, recreation, debt service, and government employee benefits.

Response: Section 5.4, Fiscal Impacts, of the Final EIS includes additional information on fiscal impacts related to the project.

10. In accordance with section 11-200-17(m), HAR, mitigation measures proposed to avoid, minimize, rectify, or reduce impact should be considered. Included in this discussion are the timing of each step proposed to be taken in the mitigation process and other provisions to assure that the mitigation measures will, in fact, be taken. We note that it is the contention of the petitioner that traffic mitigation measures are warranted with or without the proposed development. Given this assertion, the petitioner should clarify its role in contributing to its fair-share of traffic improvements and a projected timeframe for implementing such improvements in the process.

Response: The Final EIS clarifies in Section 6.1.3 that HMP will work in coordination with the State of Hawai'i Department of Transportation Traffic Branch to provide a traffic signal warrant study for the intersection of Kamehameha Highway, Halekou Road, and the HMP primary driveway, once all entitlements are received.

11. In accordance with section 11-200-17(n), HAR, unresolved issues associated with the proposed action should be discussed. To the extent that the specific method by which the petitioner will satisfy the City and County of Honolulu's affordable housing opportunities is yet to be identified at this time and will be determined by negotiation, we request that the matter be included within the *Unresolved Issues* section of the Final EIS.

Response: We have not added affordable housing to the Unresolved Issues section of the Final EIS as the residential portion of the Proposed Action is no longer part of the Proposed Action, and affordable housing requirements are no longer relevant. The Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.

12. We request that the relationship between the proposed cemetery expansion and the 20-lot residential development be further clarified

inasmuch as these uses appear to be unconnected. Clarification should also be provided on the extent of Hawaiian Memorial Life Plan, Ltd.'s, experience in developing residential projects. A discussion of these matters is needed particularly given the lack of a market study for the residential lots and the admitted viability of the all cemetery use alternative.

Response: Please refer to the answer to Question #2 above.

13. In the DEIS, there are numerous references to the term *potable water*. We request that it be replaced by the term *drinking water*. We have been advised that although potable water has generally been used to mean drinking water, the Department of Health (DOH) uses the latter term specifically to indicate water for human consumption that is derived from surface water and/or groundwater and is regulated by the DOH pursuant to chapter 11-20, HAR.

Response: The term 'potable' water has been changed to read 'drinking' water in the Final EIS.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Grant Yoshimori

July 17, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have reviewed the draft EIS for the Hawaiian Memorial Park Cemetery Expansion and these are my concerns and questions:

1. The tax map that is pictured on page 4-15 does not indicate our names as the owner of our lot. In fact, the owners cited were the owners previous to the people we bought the property from. Is this typical to use an out of date tax map in such a study?
2. Since the Preliminary Engineering Report (PER) was prepared without a completed geotechnical report and a detailed topographic survey, and given that the existing soils "are classified as having moderate to severe erosion," how can you be sure that 18 inch deep retention areas will be adequate to control storm runoff?
3. Additionally, my understanding is that these retention ponds are designed to hold additional runoff created by the development (houses and streets) but does not calculate the impact of reduced forests. Shouldn't that be addressed as well?
4. According to the report, "the only available option for potable water is the use of an on-site well and storage system." What assurances are there that these wells will not dry up the Kawa Stream which is already under stress?
5. Your report seems to minimize the potential risks to our environment associated with the seepage of chemicals used in burials and the herbicides and pesticides used in cemetery maintenance. The DEIS indicates that "the EPA does not currently regulate the burial of human remains under current environmental statutes" and appears to use that as justification for the project. Has HPM ever monitored the seepage of chemicals associated with burials and cemetery maintenance into our groundwater? Is there such a record available for public inspection?

6. You also refer to a recent study (Bent 2007) that supports your claims; could I please have the full reference information as I have not been able to locate this report and feel that the public should have access since you cite it in support of your claims of minimal impact?

7. Kawa Stream is on the EPA Clean Water Act list of impaired streams and already receives runoff from HMP. Kawa Stream also feeds into Kaneohe Bay which already does not meet the State and Federal Clean Water standards. How can the development (grading, filling, building, etc.) not further impact the quality of these bodies of water?

8. Studies done by Castle High School students in the last year have found that sedimentation and high nitrate levels are two significant concerns for Kawa Stream. Won't the construction of your development and the maintenance practices thereafter further contribute to these problems?

9. Your report indicates that a walk-through survey with 20-ft. interval transects through the interior of the petition area was used to assess the flora of the area. It cites that the survey also included the existing Ocean View Garden section of HMP as well as a buffer that extends mauka up to an elevation of 600. As our family has often hiked the trails in the area, I find it highly unusual that the endemic ohia lehua (metrosideros polymorpha) was not listed. We have found it in a variety of locations throughout the area. We have also found the indigenous u'ulei plant (osteomoles anthyllidifolia) which is also not cited. Please explain why that particular methodology was chosen when more frequently occurring native plants were not discovered using such a system?

10. In the fauna section of the DEIS, it is stated that: " Although this species was not recorded during the present survey it is possible that pueo could occasionally forage in the area." My family has lived on Ohaha Street for almost 23 years and my husband has personally sighted pueo on at least 10 occasions with at least 1 sighting during the last year. Additionally, my son has also observed the pueo flying above the forest behind our house on at least 3 separate occasions. What will happen to the pueo when their forest is taken away and replaced with grass?

11. Why was no study done to determine impact of project on native insects?

12. What will the impact be on the atmosphere in our community when forest trees are replaced with grass? My understanding is that trees take in more CO<sub>2</sub> than grass; on what basis can you say that this project will not have any affect on our climate?

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Kathleen A. O'Malley  
45-426 Ohaha Street  
Kaneohe, HI 96744

Dear Ms. O'Malley:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 17, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The tax map that is pictured on page 4-15 does not indicate our names as the owner of our lot. In fact, the owners cited were the owners previous to the people we bought the property from. Is this typical to use an out of date tax map in such a study?

Response: We obtain Tax Maps from an authorized Tax Map Key service, a service which is utilized throughout Honolulu. The key information related to Tax Maps is the existing lot configurations. If property ownership is important, we access the Real Property Division Data Base.

2. Since the Preliminary Engineering Report (PER) was prepared without a completed geotechnical report and a detailed topographic survey, and given that the existing soils "are classified as having moderate to severe erosion," how can you be sure that 18 inch deep retention areas will be adequate to control storm runoff?

Response: The PER was prepared based upon available information for the purpose of developing a conceptual layout of the proposed development. A geotechnical investigation (including percolation tests) and topographic survey will be needed prior to proceeding with the preparation of construction documents to validate the drainage calculations contained in the PER.

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13. The report indicates that the Archaeological Impact Study (AIS) has been completed and the historical and archaeological resources have been identified to fulfill State requirements for an archaeological inventory per HAR Chapter 13-13-276 and Chapter 13-13-284. However, that AIS is still pending review and determination. While the DEIS states that the "Proposed Action will comply with SHPD requirements" it appears that though a "cultural complex" has been identified and should be preserved, the expansion plan includes roadways throughout and between identified cultural sites. Therefore the archaeological "complex area" will not be retained with integrity and in fact your mitigation efforts will be to proceed with the construction and deal with any artifacts, bones, or other significant findings as they "are encountered," thus potentially causing further stress to the native community and demonstrating a true lack of cultural sensitivity.

14. The cemetery grounds will now extend to right behind our property with an interior cemetery roadway that comes very close to our backyard. Our neighborhood has already had problems with intruders coming into our properties even with the forest. Now these criminals will have much easier access. Will HMP be hiring additional security to protect us? How will this issue be addressed? This is a very serious concern.

15. Our Kaneohe community has long been committed to maintaining our natural environment. While you state that there will be minimal visual impact I don't think you have considered every perspective. Everyday when I drive home over H-3 I can see the proposed development area right behind our neighborhood and I can assure you that a 56 acre development that includes several mausoleums and 20 houses will not look natural and will have significant aesthetic impact.

I await your responses.

Sincerely,

*Kathleen A. O'Malley*

Kathleen A. O'Malley  
45-426 Ohaha Street  
Kaneohe, HI 96744

cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Safety factors have been incorporated in the calculations contained in the PER to produce conservative "drainage runoff" calculations. The retention areas are sized for those conservative runoff calculations but can be adjusted during the design of construction documents based upon the detailed geotechnical and topographic information received. We have also consulted further with our civil engineers, and the general percolation rates for the soil series found on the Petition Area are adequate to handle the drainage for the retention areas.

3. Additionally, my understanding is that these retention ponds are designed to hold additional runoff created by the development (houses and streets) but does not calculate the impact of reduced forests. Shouldn't that be addressed as well?

Response: As discussed in the EIS, any increased runoff generated by the Proposed Action as a result of the 10-year 1-hour storm will be retained on-site. In addition, the PER did consider new runoff coefficients for the change in ground surface from forest to newly planted areas and paved areas. The runoff coefficient is considered to be the same for forest and newly planted areas. As stated in the PER on page 9 "Since the cemetery expansion is replacing 'natural' vegetation with landscape material (primarily turf), there is no difference in runoff quantities other than the increase in runoff quantities generated from the impervious roadway and mausoleums within the cemetery expansion." We would also like to point out that the Petitioner has decided to eliminate the 20-lot residential subdivision from the development program, and to create a 9.4-acre cultural preserve that will retain existing flora and will not be developed, except for a modest access road. As a result, stormwater runoff increases from the design storm event will decrease from 42 cubic feet per second (cfs) to 22 cfs, a reduction of almost 50%.

Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu Department of Planning and Permitting's Rules Relating to Storm Drainage Standards of January 2000.

4. According to the report, "the only available option for potable water is the use of an on-site well and storage system." What assurances are there

that these wells will not dry up the Kawa Stream which is already under stress?

Response: There will be no new need for potable water for the project as stated above, the 20-lot residential subdivision has been eliminated from the development program. The water need for non-potable irrigation water still exists, and options for irrigation water are discussed in Section 6.2.2 of the Draft EIS.

Impacts to groundwater resources are not anticipated. Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

5. Your report seems to minimize the potential risks to our environment associated with the seepage of chemicals used in burials and the herbicides and pesticides used in cemetery maintenance. The DEIS indicates that "the EPA does not currently regulate the burial of human remains under current environmental statutes" and appears to use that as justification for the project. Has HPM ever monitored the seepage of chemicals associated with burials and cemetery maintenance into our groundwater? Is there such a record available for public inspection?

Response: There has never been any indication of any issues associated with the existing cemetery or any other reason to undertake any monitoring or testing.

6. You also refer to a recent study (Bent 2007) that supports your claims; could I please have the full reference information as I have not been able to locate this report and feel that the public should have access since you cite it in support of your claims of minimal impact?

Response: The full reference information for this article as well as all over sources for the EIS is found in Chapter 12, References. The reference is: "Bent, Boyd B. and Michael J. Knight. *Cemeteries: A Special Kind of Landfill. The context of their sustainable management.* 2007."

7. Kawa Stream is on the EPA Clean Water Act list of impaired streams and already receives runoff from HMP. Kawa Stream also feeds into Kaneohe Bay which already does not meet the State and Federal Clean Water standards. How can the development (grading, filling, building, etc.) not further impact the quality of these bodies of water?
- Response: The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The proposed project is helping to improve the water quality of Kawa Stream and ultimately Kaneohe Bay. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kawa Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawa Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

8. Studies done by Castle High School students in the last year have found that sedimentation and high nitrate levels are two significant concerns for Kawa Stream. Won't the construction of your development and the maintenance practices thereafter further contribute to these problems?

Response: Please refer to the answer to Question #7 for information on the retention areas.

9. Your report indicates that a walk-through survey with 20-ft interval

transects through the interior of the petition area was used to assess the flora of the area. It cites that the survey also included the existing Ocean View Garden section of HMP as well as a buffer that extends mauka up to an elevation of 600. As our family has often hiked the trails in the area, I find it highly unusual that the endemic ohia lehua (metrosideros polymorpha) was not listed. We have found it in a variety of locations throughout the area. We have also found the indigenous u'ulei plant (osteomoles anthyllidifolia) which is also not cited. Please explain why that particular methodology was chosen when more frequently occurring native plants were not discovered using such a system?

Response: The Botanical Survey completed for the project followed appropriate methodological protocols, and we are confident that the survey adequately covers botanical resources. The survey even covered areas outside the Petition Area. Not surprisingly, very few native species were recorded, due to the previous disturbance of the property and the presence of an introduced second growth forest. As noted in the Botanical Survey, a concerted effort was made in surveying for 'ohi'a lehua plants within the subject property; none were located. The areas where you have seen 'ohi'a lehua or u'ulei may not in fact be in the Petition Area.

10. In the fauna section of the DEIS, it is stated that: "Although this species was not recorded during the present survey it is possible that pueo could occasionally forage in the area." My family has lived on Ohaha Street for almost 23 years and my husband has personally sighted pueo on at least 10 occasions with at least 1 sighting during the last year. Additionally, my son has also observed the pueo flying above the forest behind our house on at least 3 separate occasions.

Response: There is not expected to be an adverse impact to any avifauna species due to the project. As noted in Section 4.8 of the EIS, the short-eared Owl or Pueo (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible Pueo could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the Pueo. There is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few Pueo that still exist on O'ahu would require. Additionally, according to our fauna consultant, most sightings of Pueo actually turn out to be the common introduced Barn Owl.

11. Why was no study done to determine impact of project on native insects?

**Response:** A survey of native invertebrate resources for the Petition Area was conducted in August 2008 by Steven Lee Montgomery Ph.D., and the following language has been added to Section 4.8.1 of the EIS, Fauna:  
"The primary purpose of the survey was to determine the presence or absence in the Petition Area of any endemic or indigenous terrestrial invertebrates, especially any species with legal status under federal or state threatened and endangered species statutes."

The survey methodology included a general assessment of terrain and habitats after reviewing maps and prior reports. Surveying efforts were conducted by day and night to ensure a thorough survey. The property was traversed across all habitat types, alternately following established pathways to search for any native botanical resources and substitute host plant options for native invertebrates. The collection methods used were appropriate for terrestrial invertebrates for the terrain, botanical resources, and target species, and included: 1) host plant searches (visual inspection of resting sites and searching known feeding or breeding sites such as under dead bark); 2) use of sweep nets (a general method of censusing most flying and perching insects where a fine mesh net was swept across plants, leaf litter, etc. to sample any flying or perching insects); 3) visual observation (any visual evidence of arthropod presence or activity. Visual observations provide valuable evidence and are a cross check that extends the reach of sampling techniques); and 4) light sampling, which surveys insects active at night (using a bright light in front of a white cloth sheet).

The survey focused on finding any endemic and indigenous Hawaiian species. No attempt was made to collect or completely document the many common alien arthropod species present in the area. Three native species were encountered: the endemic bug *Trigonotylus hawaiiensis*, the endemic Moss moth (*Eudonia sp.*); and the endemic small moth or micro-moth (*Mesofobes*). No native mollusks were observed and no invertebrate listed under either federal or state endangered species statutes was located. The extremely low level of native plants serving as arthropod hosts is most likely the reason for the absence of Hawaiian arthropods in the Petition Area."

To Section 4.8.2, Probable Impacts, the following language was added:

"No Federal or state listed endangered or threatened invertebrate species were found in the Petition Area; nor were any rare native Hawaiian

invertebrate species observed. The few native Hawaiian invertebrates observed are widespread in distribution. The anticipated actions related to the Proposed Action are not expected to have a significant negative impact on an endemic or indigenous species. No part of the property is designated critical habitat for any threatened or endangered species."

12. What will the impact be on the atmosphere in our community when forest trees are replaced with grass? My understanding is that trees take in more CO<sub>2</sub> than grass; on what basis can you say that this project will not have any effect on our climate?

**Response:** The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed HMP expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.

Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

13. The report indicates that the Archaeological Impact Study (AIS) has been completed and the historical and archaeological resources have been identified to fulfill State requirements for an archaeological inventory per HAR Chapter 13-13-276 and Chapter 13-13-284. However, that AIS is still pending review and determination. While the DEIS states that the "Proposed Action will comply with SHPD requirements" it appears that though a "cultural complex" has been identified and should be preserved, the expansion plan includes roadways throughout and between identified

cultural sites. Therefore the archaeological "complex area" will not be retained with integrity and in fact your mitigation efforts will be to proceed with the construction and deal with any artifacts, bones, or other significant findings as they "are encountered," thus potentially causing further stress to the native community and demonstrating a true lack of cultural sensitivity.

Response: The statements about these sites being part of a whole complex are well taken. However, detailed further study to determine whether the sites are contemporaneous would be required to determine for certain if they are a complex. These sites are indeed a component of the present landscape, but whether they were in use at the same time in an integrated community is yet to be determined and would require extensive further study in addition to that included in the scope for the inventory survey.

As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the AIS and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawā'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, the concept plan for the project has been modified, and a 9.4-acre cultural preserve has been established that encompasses five archaeological sites within the Petition Area between the Kawā'ewa'e Heiau and Site 6931. This culture preserve will also include significant areas where the lauā'e fern is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

14. The cemetery grounds will now extend to right behind our property with an interior cemetery roadway that comes very close to our backyard. Our neighborhood has already had problems with intruders coming into our properties even with the forest. Now these criminals will have much easier access. Will HMP be hiring additional security to protect us? How will this issue be addressed? This is a very serious concern.

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

15. Our Kaneohe community has long been committed to maintaining our natural environment. While you state that there will be minimal visual impact I don't think you have considered every perspective. Everyday when I drive home over H-3 I can see the proposed development area right behind our neighborhood and I can assure you that a 56 acre development that includes several mausoleums and 20 houses will not look natural and will have significant aesthetic impact.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS, including from the H-3 freeway.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. From viewplanes further away, the proposed cemetery expansion area is slightly visible, but overall the viewplane is still characterized by the green backdrop of the hills.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Where the roofs of the mausoleums are visible, they are a minor element of the viewshed. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.



Ms. Kathleen O'Malley  
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The Petition Area and associated cemetery are visible from the H-3 freeway, although as a small portion of the overall viewshed which is predominately one of residential neighborhoods with the Oneawa Hills as a backdrop. Additionally this view is one that is seen for only a matter of seconds while travelling at 55 miles per hour in a car. Nevertheless, the Petition Area and project are visible from this vantage point.

We appreciate your thoughtful consideration of the issues discussed in the EIS, and your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



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July 18, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

RE: Hawaiian Memorial Park Cemetery Expansion  
Draft Environmental Impact Statement

Hawaii's Thousand Friends has the following comments and concerns.

### 3.1.1 Hawaii State Plan

- Pg. 3-1 The DEIS response to State Plan Section 226-11(b)(3) *Take into account the physical attributes of areas when planning and designing activities and facilities that the terrain is "gently sloping"* is incorrect. The Project Area contains four rockfall hazard areas and the 20-lot subdivision is proposed for areas with slopes from 0-20% and 20-30% and >30%.
- Pg. 3-1 The DEIS response to State Plan Section 226-12 *Objective and policies for physical environment-scenic, natural beauty, and historic resources* is inadequate. Providing buffers and access for customary practices, removing 73% of the existing natural vegetation and minimizing impacts to cultural sites does not *Promote the preservation and restoration of significant natural and historic resources. Promote the views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features* or offer any real protection for those *special areas, structures, and elements that are an integral and functional part of Hawaii's ethnic and cultural heritage.*
- Pg. 3-2 In response to State Plan Section 226-14(b)(7) *Encourage urban developments in close proximity to existing services and facilities* the DEIS fails to acknowledge that the existing facilities are located in the Urban District and the proposed 20-lot subdivision is in the Conservation District. In addition, the Ko'olaupoko Sustainable Communities Plan (KSCP), which is not to be altered until at least 2020, identifies the Petition Area as outside the Urban Community Boundary.
- Pg. 3-45 Section 226-104(b)(1) *Encourage urban growth primarily to existing urban areas ...* The proposed 20-lot subdivision and cemetery expansion do not meet this objective because the entire 56+ acre expansion area is not in the Urban District, zoned P-1 Restricted Preservation and is outside the KSCP Urban Community Boundary.

### 3.1.2 State Functional Plans

- The fact that the DEIS mentions the possibility of payment of an in-lieu fee does not meet Policy A (3): *Ensure that (1) housing projects and (2) projects which impact housing provide a fair share/adequate amount of affordable homeownership opportunities.* Instead, it signals a lack of commitment to provide on-site affordable housing.

### 3.1.1 State Land Use Law

- The proposed project does not meet the criteria of (2)(c) *Sufficient reserve areas for foreseeable urban growth* because the Ko'olaupoko Sustainable Communities Plan, which is not to be altered until at least 2020, identifies the Petition Area as outside the Urban Community Boundary.
- The project does not meet (3) *It shall include lands with satisfactory topography, drainage, and reasonably free from the danger of any flood, tsunami, unstable soil condition, and other adverse environmental effects* because the DEIS identifies four rockfall hazard sites. The DEIS states that the rockfall hazards can be mitigated but fails to fully describe what mitigating technology will be used at each site to prevent rock falls. Of special concern is the rockfall hazard site adjacent to the proposed 20-lot subdivision.
- The proposed 20-lot subdivision does not meet (4) *... indicated for future urban use on state or county general plans or (5). ...shall give consideration to areas or urban growth as shown on state and county general plans* because the Ko'olaupoko Sustainable Communities Plan does not identify the Petition Area for urban use or expansion. On the contrary it is in the Conservation District and outside the Urban Community Boundary.
- The proposed development does not meet (8) *It may include lands with a general slope of 20% or more if the commission finds that those lands are(s) desirable and suitable for urban purposes...* because the Petition Area is outside the KSCP Urban Community Boundary, in the Conservation District and zoned P-1 Restricted Preservation. The KSCP is the county guiding planning document that provides long-range visions and policies to guide the land use and infrastructure decisions from Makapu'u Point to Ka'oio Point at the end of Kaneohe Bay. The Plan seeks to preserve Ko'olaupoko's natural, scenic, cultural, historic and agricultural resources. KSCP identifies the Petition Area as outside the Urban Community Boundary and specifically excludes the Oneawa Hills from within the Urban Community Boundary.

### Ko'olaupoko Sustainable Communities Plan (Pg. 3-13)

- *Protection of natural and scenic resources.* It is misleading to say that the 24 ft high mausoleums "will not be visible from surrounding neighborhoods" because the Petition Area is visible from almost all areas of Kaneohe including H-3 and Likelike Highway.
- It is misleading to say that the "current concept plan indicates a minimum 50 ft buffer of existing vegetation between the adjoining residential property line and the cemetery" because elsewhere in the DEIS it is stated that the ground will be graded and leveled and that vegetation will be removed. It appears that the 50 ft high vegetation will be between the houses in the proposed 20-lot subdivision and the cemetery. If that is the case the buffer does not provide any visual relief from people outside of the cemetery. Will the landowner provide and maintain the 50 ft high vegetative buffer? If not, how will

Hawaiian Memorial Life Plan guarantee that the 20-lot private owners will provide and maintain the 50 ft high vegetative buffer?

### Establish Urban Community, Rural Community, Agriculture and Preservation boundaries (SCP Section 23.2.7) (Pg. 3-16)

1. While the Development Plans are to be reviewed every five years that review does not necessarily call for the alteration of the KSCP Urban Community Boundary, which is to remain in place until 2020 as a planning tool.
2. The Urban Community Boundary is intended to confine most new development to "infill" sites within existing urbanized areas to prohibit sprawl.

### 4.3.2 Probable Impacts & 4.3.3 Mitigation (Pg. 4-5)

1. The DEIS identifies "on-site soils" as "useable for landscaping, cemetery activities and cut/fill" but does not mention suitability for housing.
3. The DEIS does not address soil "swelling or shrinkage." This issue must be addressed in the FEIS. This omission is critical given that the existing soils are classified as "having moderate to severe erosion" and could negatively impact down slope residential areas.
4. The DEIS states that "permanent erosion control measures will protect the Petition Area against future soil erosion" but does not mention erosion control measures that will be used to protect down slope residential areas including preventing silt from reaching Kawa Stream. Protective measures for down slope residential areas and silt prevention must be addressed in the FEIS.

### 4.5 Groundwater Resources (Pg. 4-8)

1. The Petition Area is located below the Underground Injection Control (UIC) line thus the water is not suitable for drinking yet the SSFM International report suggests that the "The proposed onsite well systems constructed to supply irrigation water could also provide the necessary potable water supply if the water tests successfully for portability and/or if additional treatment onsite can improve minor deficiencies in the water to qualify potable levels."
2. Since the Petition Area is within a designated ground water management area any withdrawal must be justified to obtain a use permit from the Commission on Water Resource Management (CWRM). Neither the DEIS or SSFM International Report recount any discussion with CWRM.
3. Since the DEIS states that the only available option for potable water is the use of an on-site well and storage system it is important that any discussion with CWRM be included in the FEIS.
4. HTF supports working with KBAC but KBAC has no regulatory powers and since the area has high rain fall, moderate to severe erosion and new impervious surfaces could create greater impacts it is imperative that measures to prevent not just mitigate impacts to ground and surface water including the ocean and down slope residents are defined and approved by appropriate state and county agencies who will have regulatory oversight.

#### Natural Hazards (Pg. 4-13)

1. Four areas within the Petition Area have been identified as potential rockfall hazard sites with one site located adjacent and above eight of the 20 single-family lots including a portion of a proposed roadway.
2. Two of the mausoleums are located in one of the rockfall hazard areas and three historic sites are located within one of the rockfall hazard areas. Unless mitigation measures are adequately addressed in the FEIS there is a real concern that the three historic sites could be closed to the public due to safety concerns. The same holds true for any trails that are used by the public that traverse the Petition Area but are not shown on any map in the DEIS.
3. The DEIS identifies four possible mitigation measures that could be used but does not specify which measure will be used at each site making it impossible to determine the impact of the measures on the specific site and surrounding area including impacts to cultural sites.

#### 4.7.1 Flora (Pg. 4-18)

1. This section does not identify or show the location of plants having "past and present ethnobotanical uses for native Hawaiians" as identified in 5.5 Traditional Customs and Practices pg. 5-7. This is a significant omission and one that can lead to destruction of plants or the dense vegetation required by the highly valued *Iuwa* ʻ.
2. The FEIS must show the location of all culturally and ethnobotanical significant plants on maps along with plans for preservation and public access.

#### 4.8 Fauna (Pg. 4-21)

1. Although the DEIS, pg. 4-21, identifies the Pacific Golden-Plover as being observed on the lawn and a 5/23/08 letter from Helber Hastert & Fee states "There could be an effect on presence of migratory shorebirds such as Pacific golden-Plover which are present from August to end of April" there is no discussion on potential impacts or protective measures on the migratory birds during construction.

#### 4.9 Historic, Cultural, and Archaeological Resources (Pg. 4-22)

1. The identification of eight sites within the Petition Area and four sites including Kaw'ewa e Heiau outside the boundary are an indication of a cultural complex that could contain yet undiscovered sites and features. Therefore, it is imperative that the utmost care and consideration be given to oral and written history, present cultural users, and subsurface testing must be expanded before any activity is approved for the Petition Area.

#### 4.10 Scenic and Visual Resources (Pg. 4-39)

1. The DEIS states "Kaneohe is noted for its striking topographic features including the mountains..." Presently Oneawa Hills serves as a naturally vegetated buffer to urban Kaneohe any development will continue the urban creep. Removal of the natural vegetation on Oneawa Hills will reduce the areas effectiveness as a natural forest watershed, recharge area and become another urban landscape.
2. It is insufficient to state that "The mausoleums will not be visible from surrounding neighborhoods.... because Oneawa Hills, lower and upper sections, are visible from many areas and roads in Kaneohe, H-3 and Likelike Highway."

#### 5.5 Traditional Customs and Practices (Pg. 5-6)

1. The FEIS must identify the location of all culturally and ethnobotanical significant plants on maps along with plans for preservation and public access.
2. While the DEIS acknowledges the existence of many trails along Oneawa Hills including some that "could" be ancient it also states "All trail use of the property is unauthorized." Does that mean that if this area is developed that some/all trails will be closed to the public? This is a serious omission.
3. A map of the trail system that traverses the Petition Area and a section on the availability of these trails to the public must be included in the FEIS.
4. This section states that during grading of the Petition Area "*Iuwa* ʻ along with other plants growing in the area could be affected" but since there is no map showing where the significant plants are located or how many plants are within the Petition Area it is impossible to evaluate the significance, extent or impact of the destruction of the plants.
5. A full inventory of the significant plants and their location within the Petition Area must be included in the FEIS.
6. It is inadequate to say that "Those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds" because the vague language could exclude cultural practitioners, Hawaiian Civic Clubs, hula halau and others who have a cultural interest in the area.
7. The FEIS must identify and include cultural organizations and individuals that will be consulted should there be any inadvertent cultural finds.
8. While saying that education programs will be mandatory the DEIS does not say who will create and provide those programs. It is imperative that the programs be created and conducted by individuals or organizations with cultural and historical knowledge of the area and they should be so identified in the FEIS.

#### 6.1 Transportation (Pg. 6-1)

1. Lipalu Street will be the only access to 20-lot subdivision yet there is no discussion on direct and indirect impacts of the additional cars, the ability of Lipalu Street to handle additional traffic, or the need for improvements to Lipalu Street. Is Lipalu Street a 44 ft wide street with two 12-ft wide travel lanes as the new access will be? If not, what is the aesthetic and funnel impact of traffic going from a wide street into a narrower street?

#### 6.2 Water Supply (Pg. 6-9)

1. The SSFM International report recounts that BWS has indicated that their existing system serving the Lipalu Street area is unable to provide domestic water to the 20-lot residential subdivision and comfort station.
2. The report further states that residential subdivisions can be located above their service limit if the property has frontage and the meter is placed 100' below the required service limit. These conditions cannot be met at the end of Lipalu St, as the existing elevations are approx 190', which will not be 100' below the 272' service limit. As a result the Petition Area cannot hook up to the existing Lipalu Street line and an on-site water system must be developed to provide domestic water service to the subdivision and comfort station. The DEIS provides no evidence that this has been done.

3. In letters to SSFM International BWS has stressed that the Applicant must investigate the feasibility of non-potable water sources prior to the use of potable water sources for irrigation. The DEIS does not provide any information showing that the Applicant has investigated the feasibility of on-site non-potable water sources
4. BWS does state that if a non-potable water source is not available or feasible a connection to Kumakua Place or another available BWS source may be a possible option. Yet, the DEIS provides no evidence that the Applicant has investigated the potential for on-site non-potable water sources.
5. The DEIS stresses that the only option for providing potable water to the residential subdivision and the cemetery restroom is to build an on-site water system. Yet, the DEIS does not discuss if any viable potable water source was found or where the wells would be located.
6. While the DEIS states the following "The proposed on-site well systems constructed to supply irrigation water could also provide the necessary potable water supply if the water tests successfully for portability and/or if additional treatment onsite can improve minor deficiencies in the water to qualify potable levels" there is no evidence that any non-potable or potable water sources have been found in the Petition Area.
7. BWS sent three letters, 10/20/06, 12/15/06 and March 1, 2007 to SSFM International requesting that research be conducted to determine the feasibility of developing a non-potable water source for irrigation of the cemetery expansion. The DEIS did not identify or report that non-potable water sources for irrigation are available.
8. BWS has indicated there is "ample water quantities and pressure should exist in association with the Kumakua Place system to fully service the approximately 30 acres of turf landscaping at full build out for the cemetery expansion area." BWS seems to be sending mixed messages. First, by requiring the Applicant to investigate potential on-site non-potable water for irrigation but second, if none is available there is the possibility that the Applicant could use potable water for irrigation. Is irrigation the best use of Hawaii's finite water resources?
9. The SSFM International report is the first time that a "water treatment facility" is mentioned. Proposed water storage is shown on Figure 4 but there is no evidence of a "water treatment facility." The FEIS must provide details on the "facility" such as location, use and identify potential impacts to the environment.
10. The bottom line is that no permits should be considered or granted until: 1) viable on-site non-potable and potable water sources are identified, 2) the amount and quality of water available is known, 3) the amount of water to be withdrawn and the uses are known and 4) impacts from water withdrawal on the aquifer are understood.

### 6.3 Wastewater (Pg. 6-11)

1. This section lists five sewer improvements and rehabilitation projects but does not state if all or any of the projects have been completed and are working satisfactorily to handle the additional sewage from the 20-lot subdivision and cemetery restroom. If the Applicant is relying on these improvements to justify and handle the additional sewage then it is imperative that these projects be completed before approvals are granted.
2. This information must be provided in the FEIS.
3. If development does not rely on these improvements then the Applicant must show that there is adequate capacity in the collection system, Aikahi Wastewater Treatment Plant

and existing 8-inch sewer line on Lipalu Street before any approvals to proceed are granted.

4. Does the Lipalu Street 8-inch sewer line have excess capacity? If so, explain why there is additional capacity because it is our understanding that unless future hookup is anticipated sewer lines are not built with additional capacity.
5. Two statements seem contradictory. First, it is claimed that the 8-inch sewer line has excess capacity then it is stated "Development of the Petition Area will not commence until DPP confirms that adequate capacity exists." Which statement is true?
6. At what stage of the planning process will DPP confirm that "adequate" wastewater capacity exists in the Lipalu Street line, collection system and Aikahi Wastewater Treatment Plant?
7. Pg. 3-3 states "Development of the Petition Area will not commence until DPP confirms adequate capacity exists and approves both the project sewer master plan prepared for the project and the sewer connection permit." Elsewhere in the DEIS it is stated that DPP has approved the sewer connection permit. Which statement is correct?

### 6.4 Drainage (Pg. 6-12)

1. The Petition Area lies within the Kawa Stream watershed and any development will only add to the approximately 40% of the watershed that contains impervious surfaces.
2. Kaneohe Bay is designated as Class AA water body, providing the highest priority water quality protection. The Bay does not meet water quality standards set by EPA under the Clean Water Act. Removing the natural vegetation that creates the Oneawa Hills watershed and recharge area will only add to the degradation of Kawa Stream and Kaneohe Bay.
3. Kawa Stream is considered impaired by high levels of nutrients (nitrogen and phosphorus, turbidity) and suspended solids. Adding new areas that require fertilizers and pesticides will increase the nutrient levels.
4. Pg. 6-15 The highest concentrations of nitrogen appear in the upper reaches of the stream, from the basins that make up the existing HMP, the residential housing and Hawaii's State Veterans Cemetery.
5. Due to slope and low soil permeability associated with the Petition Area, the majority of storm water runoff currently generated during rain events discharges from the site as runoff rather than infiltrating into the soil.
6. As a result of the cemetery expansion and residential development, total storm water runoff attributable to the Petition Area is expected to increase from 478 cfs to 520 cfs, an increase of 8.7%.
7. It is unclear what is meant by "Any increased runoff generated by the Proposed Action will be retained on-site for the county design storm event."

### 7.0 Cumulative Impacts (Pg. 7-1)

1. While Hawaii's Pacific University (HPU) is not adjacent to the Petition Area their proposal to increase dorm capacity to accommodate approximately 600 new students will have an impact on the capacity of Aikahi Wastewater Treatment Plant and should be considered when calculating the cumulative impacts of added sewage to the plant.
2. It is incorrect to state that "In general, the topographic profile of the Petition Area will remain intact" since extensive grading must be done to level the terrain that ranges from

October 8, 2008

Hawaii's Thousand Friends  
25 Maluniu Ave., Suite 102, PMB 282  
Kailua, HI 96734



Dear Hawaii's Thousand Friends:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1

Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 18, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

- 20% slopes to more than 30% slopes for housing, roads, the mausoleums and drainage swells. The cumulative impact on the natural environment and down slope residents of this massive grading and 73% vegetation removal must be evaluated.
3. The cumulative impact of all four rockfall mitigation efforts must be evaluated.
4. It is incorrect to say that "The Proposed Action will not have a significant cumulative effect on Groundwater Resources" when research has not been conducted on the feasibility of wells for potable and non-potable use. Each well will draw down the water table so before any approvals are granted the number of wells needed to service the Petition Area, the use of the water (potable or non-potable) and the amount of water to be drawn from the wells in this ground water management area must be identified.
5. It is incorrect to state that "The proposed action will not have a cumulative effect on Natural Hazards" when four rockfall sites exist and will require some level of mitigation.
6. It is incorrect to claim that "The Proposed Action will not have a negative cumulative effect on historic, cultural, and archaeological resources" when extensive grading and grubbing will be done near/adjacent to eight **known/discovered** pre-contact and historic sites within the Project Area and four sites that are outside the Petition Area. The cumulative impact on all historical/cultural sites must be articulated in the FEIS.
7. It is not correct to say that "The Proposed Action will not have a cumulative negative impact on traditional customs and practices" because location of plants have not been identified, access to existing and currently used trails has not been address, continued access for gathering and cultural practices including caring for historic sites has not been discussed.
8. The FEIS must discuss how feasible it is that cultural practitioners or hikers will traverse the cemetery to get to their destination?
9. What are the cumulative impacts from increased storm water flow and increased wind velocity on neighboring properties once the forest coverage is removed and human activities such as lawn maintenance and use of pesticides increased?
10. What is the cumulative impact of increased impervious surfaces that will reduce rainwater infiltration into the underlying aquifer?
11. Impacts from increased impervious surfaces on reduced infiltration into the underlying aquifer and increased overland flow to down slope residential areas, Kawa Stream and eventually the coast must be thoroughly evaluated in the FEIS.

1. Hawaii State Plan Pg. 3-1 The DEIS response to State Plan Section 226-11 (b)(3) *Take into account the physical attributes of areas when planning and designing activities and facilities* that the terrain is "gently sloping" is incorrect. The Project Area contains four rockfall hazard areas and the 20-lot subdivision is proposed for areas with slopes from 0-20% and 20-30% and >30%.

Response: The sentence you are referring to in the EIS is written in the future tense, and describes what the terrain will be like with the Proposed Action.

2. The DEIS response to State Plan Section 226-12 *Objective and policies for physical environment-scenic, natural beauty, and historic resources* is inadequate. Providing buffers and access for customary practices, removing 73% of the existing natural vegetation and minimizing impacts to cultural sites does not *Promote the preservation and restoration of significant natural and historic resources. Promote the views and vistas to enhance the visual and aesthetic enjoyment of mountains, ocean, scenic landscapes, and other natural features or offer any real protection for those special areas. structures, and elements that are an integral and functional part of Hawai'i ethnic and cultural heritage.*

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on

Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, the project will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

In regard to view impacts, the individual experience of a view is quite subjective, and two people looking at the same landscape could have two different responses to that landscape. Having said that, Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. HMP has modified the project development program and will eliminate the 20-lot residential subdivision and Lipalu Street extension intended to service those lots from the Proposed Action. The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same look as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. This character is represented by Figure 22b (attached), which demonstrates an oblique aerial view of the Petition Area, as seen from the northwest to the southeast, at an elevation of about 1,000 feet, which is a view that is not visible to the public.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer.

Figures 24, 28a, and 28b of the Draft EIS are still relevant to demonstrate the typical profiles of how the elevation difference and landscaped buffer will shield the Petition Area from view in the adjacent residential neighborhoods.

3. In response to State Plan Section 226-14(b)(7) *Encourage urban developments in close proximity to existing services and facilities* the DEIS fails to acknowledge that the existing facilities are located in the Urban District and the proposed 20-lot subdivision is in the Conservation District.  
  
Response: The EIS states in several places that the Petition Area is located in the Conservation District; the reclassification of the Petition Area from the Conservation to the Urban District is one of the triggers for the EIS requirement. As noted above, the 20-lot residential subdivision will be removed from the Proposed Action.
4. In addition, the Ko'olau Poko Sustainable Communities Plan (KSCP), which is not to be altered until at least 2020, identifies the Petition Area as outside the Urban Community Boundary.  
  
Response: While the Ko'olau Poko SCP does state that the urban growth boundaries should remain fixed through the year 2020, this SCP is only a guidance document. There are mechanisms in place for requesting changes (an amendment) to the SCP, which is what the Petitioner plans to do. Also, the SCPs are mandated to be reviewed and updated every five years (Sec. 24-6-10 of Ordinance 00-47). During this update, all existing language and land use maps are open to revision.
5. Section 226-104(b)(1) *Encourage urban growth primarily to existing urban areas.* The proposed 20-lot subdivision and cemetery expansion do not meet this objective because the entire 56+ acre expansion area is not in the Urban District, zoned P-1 Restricted Preservation and is outside the KSCP Urban Community Boundary.  
  
Response: As noted above in the answer to Question 2, the project will no longer contain the residential lots. Additionally, Section 3.1.1 of the EIS analyzes the impacts of the project with respect to relevant State Plan goals, objectives, policies, and priority guidelines.
6. State Functional Plans. The fact that the DEIS mentions the possibility of payment of an in-lieu fee does not meet Policy A (3): Ensure that (1) housing projects and (2) projects which impact housing provide a fair share/adequate amount of affordable homeownership opportunities. Instead, it signals a lack of commitment to provide on-site affordable housing.  
  
Response: The affordable housing requirement no longer applies as the residential portion of the project will not be built.
7. State Land Use Law. The proposed project does not meet the criteria of

(2)(c) Sufficient reserve areas for foreseeable urban growth because the Ko'olaupoko Sustainable Communities Plan, which is not to be altered until at least 2020, identifies the Petition Area as outside the Urban Community Boundary.

Response: Please refer to the response to Question #4 above.

8. The project does not meet (3) *It shall include lands with satisfactory topography, drainage, and reasonably free from the danger of any flood, tsunami, unstable soil condition, and other adverse environmental effects* because the DEIS identifies four rockfall hazard sites. The DEIS states that the rockfall hazards can be mitigated but fails to fully describe what mitigating technology will be used at each site to prevent rock falls. Of special concern is the rockfall hazard site adjacent to the proposed 20-lot subdivision.

Response: The specific methods of mitigation for each area will be determined prior to completion of final grading plans. In addition, the residential portion of the project will not be built.

9. The proposed 20-lot subdivision does not meet (4).... *indicated for future urban use on state or county general plans or (5).... shall give consideration to areas or urban growth as shown on state and county general plans* because the Ko'olaupoko Sustainable Communities Plan does not identify the Petition Area for urban use or expansion. On the contrary it is in the Conservation District and outside the Urban Community Boundary. The proposed development does not meet (8)11 *may include lands with a general slope of 20% or more if the commission finds that those lands area(sp) desirable and suitable for urban purposes....* because the Petition Area is outside the KSCP Urban Community Boundary, in the Conservation District and zoned P-1 Restricted Preservation. The KSCP is the county guiding planning document that provides long-range visions and policies to guide the land use and infrastructure decisions from Makapuu Point to Kaolo Point at the end of Kaneohe Bay. The Plan seeks to preserve Ko'olaupoko's natural, scenic, cultural, historic and agricultural resources. KSCP identifies the Petition Area as outside the Urban Community Boundary and specifically excludes the Oneawa Hills from within the Urban Community Boundary.

Response: The concerns about the proposed 20-lot subdivision are no longer applicable because the residential portion of the project will not be built.

10. Ko'olaupoko Sustainable Communities Plan (Pg. 3-13) *Protection of natural and scenic resources:* It is misleading to say that the 24 ft high mausoleums "will not be visible from surrounding neighborhoods" because the Petition

Area is visible from almost all areas of Kaneohe including H-3 and Likelike Highway. It is misleading to say that the "current concept plan indicates a minimum 50 ft buffer of existing vegetation between the adjoining residential property line and the cemetery" because elsewhere in the DEIS it is stated that the ground will be graded and leveled and that vegetation will be removed. It appears that the 50 ft high vegetation will be between the houses is the proposed 20-lot subdivision and the cemetery. If that is the case the buffer does not provide any visual relief from people outside of the cemetery. Will the landowner provide and maintain the 50 ft high vegetative buffer? If not, how will Hawaiian Memorial Life Plan guarantee that the 20-lot private owners will provide and maintain the 50 ft high vegetative buffer?

Response: Please refer to the answer to Question #2 for discussion of the visual impacts. Further analysis has been performed from many other vantage points, including the H-3 freeway, and is included in the Final EIS. The vegetated buffer areas will indeed be between the Petition Area and the surrounding residential neighborhood.

11. Establish Urban Community, Rural Community, Agriculture and Preservation boundaries (SCP Section 23.2.7) (Pg. 3-16) While the Development Plans are to be reviewed every five years that review does not necessarily call for the alteration of the KSCP Urban Community Boundary, which is to remain in place until 2020 as a planning tool. The Urban Community Boundary is intended to confine most new development to "infill" sites within existing urbanized areas to prohibit sprawl.

Response: Please refer to the answer to Question #4 above.

12. 4.3.2 Probable Impacts & 4.3.3 Mitigation (Pg. 4-5). The DEIS identifies "on-site soils" as "useable for landscaping, cemetery activities and cut/fill" but does not mention suitability for housing. The DEIS does not address soil "swelling or shrinkage." This issue must be addressed in the FEIS. This omission is critical given that the existing soils are classified as "having moderate to severe erosion" and could negatively impact down slope residential areas.

Response: Section 4.6.2 of the DEIS addresses soil "swelling/shrinkage". The Slope Stability report found that there was no apparent hazard associated with slope stability. In addition, according to the comment letter from Natural Resources Conservation Service on the Draft EIS, the ratings for the on site soils "do not preclude the intended land use, however they do identify potential limitations for the use, which may require corrective measures, increase costs, and/or require continued maintenance." The project will carefully consider all potential limitations for use. In any event, the

housing will not be built.

13. The DEIS states that "permanent erosion control measures will protect the Petition Area against future soil erosion" but does not mention erosion control measures that will be used to protect down slope residential areas including preventing silt from reaching Kawa Stream. Protective measures for down slope residential areas and silt prevention must be addressed in the FEIS.

Response: As discussed in Section 6.4 of the EIS, the project will protect down slope residential areas and Kawa Stream with retention areas. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of storm water (Total Suspended Solids, Nitrogen, Phosphorus) that ultimately reach Kawa Stream from the cemetery expansion area will not increase from current levels.

14. The Petition Area is located below the Underground Injection Control (UIC) line thus the water is not suitable for drinking yet the SSFM International report suggests that the "The proposed onsite well systems constructed to supply irrigation water could also provide the necessary potable water supply if the water tests successfully for portability and/or if additional treatment onsite can improve minor deficiencies in the water to qualify potable levels."

Response: The location of the UIC does not necessarily determine suitability. It delineates the areas, above which, the BWS DOES drill wells for drinking water. In any event, the abandonment of the 20-lot residential subdivision avoids the necessity of an on-site well for domestic purposes.

15. Since the Petition Area is within a designated ground water management area any withdrawal must be justified to obtain a use permit from the Commission on Water Resource Management (CWRM). Neither the DEIS or SSFM International Report recount any discussion with CWRM. Since the DEIS states that the only available option for potable water is the use of an on-site well and storage system it is important that any discussion with CWRM be included in the FEIS.

Response: We understand that CWRM approval is required. The Final EIS has been updated with correspondence from the CWRM on the Draft EIS. Section 4.5.2, 2<sup>nd</sup> paragraph has had the following sentence added:  
"Correspondence with the CWRM has indicated the project should coordinate

with City and County of Honolulu's Water Use and Development Plan to ensure the project is incorporated with these plans." Nevertheless, drinking water will no longer be required for the Petition Area as the residential portion of the project will not be built.

Section 4.5.2, 3<sup>rd</sup> paragraph has had the following sentence added: "The CWRM has indicated they do not anticipate any impacts to the quantity of ground and surface water flows."

16. HTF supports working with KBAC but KBAC has no regulatory powers and since the area has high rain fall, moderate to severe erosion and new impervious surfaces could create greater impacts it is imperative that measures to prevent not just mitigate impacts to ground and surface water including the ocean and down slope residents are defined and approved by appropriate state and county agencies who will have regulatory oversight.

Response: Please refer to the answer to #13 above for a discussion of the retention areas to be part of the project. Additionally, we note in the EIS that we will need to obtain an NPDES permit from DOH and comply with all conditions associated with the permit, and will have to obtain a grading permit from the City and County of Honolulu and comply with conditions of that permit.

17. Four areas within the Petition Area have been identified as potential rockfall hazard sites with one site located adjacent and above eight of the 20 single-family lots including a portion of a proposed roadway. Two of the mausoleums are located in one of the rockfall hazard areas and three historic sites are located within one of the rockfall hazard areas. Unless mitigation measures are adequately addressed in the FEIS there is a real concern that the three historic sites could be closed to the public due to safety concerns.

Response: Potential mitigation measures from the Rockfall Hazard Assessment Report are identified in Section 4.6.3 of the EIS. They are: 1. Securing existing boulders using netting or chaining; 2. Removal of the boulders; 3. Installation of fencing uphill from proposed improvements; and 4. Constructing a buffer zone between the rockfall hazard source and the proposed improvement. The choice of mitigative measure will depend on the specific site conditions. No hazards will effect housing as this aspect of the development has been eliminated.

18. The same holds true for any trails that are used by the public that traverse the Petition Area but are not shown on any map in the DEIS. The DEIS identifies four possible mitigation measures that could be used but does not specify which measure will be used at each site making it impossible to determine



the impact of the measures on the specific site and surrounding area including impacts to cultural sites.

Response: Please refer to the answer to Question #17 above for discussion of the mitigation measures.

19. Flora (Pg. 4-18) This section does not identify or show the location of plants having "past and present ethnobotanical uses for native Hawaiians" as identified in 5.5 Traditional Customs and Practices pg. 5-7. This is a significant omission and one that can lead to destruction of plants or the dense vegetation required by the highly valued *laua'e*. The FEIS must show the location of all culturally and ethnobotanical significant plants on maps along with plans for preservation and public access.

Response: The Final EIS includes a new figure that shows the locations of the *laua'e* communities which were identified during additional field work in an addendum to the Botanical Survey prepared for this project.

20. Although the DEIS, pg. 4-21, identifies the Pacific Golden-Plover as being observed on the lawn and a 5/23/08 letter from Helber Hastert & Fee states "There could be an effect on presence of migratory shorebirds such as Pacific golden-Plover which are present from August to end of April" there is no discussion on potential impacts or protective measures on the migratory birds during construction.

Response: The impacts to the Pacific Golden-Plover would be a disturbance to those with lawn territories directly adjacent to the forested areas being cleared. This would likely result in displacing these birds to other lawn habitat that was not already occupied by a territorial plover. The subsequent expansion of lawn habitat, due to the expansion of the cemetery, will provide more habitat for Pacific Golden-Plovers and will likely increase the number of wintering territorial Pacific Golden-Plover at this site.

21. The identification of eight sites within the Petition Area and four sites including Kaw'ewa'e Heiau outside the boundary are an indication of a cultural complex that could contain yet undiscovered sites and features. Therefore, it is imperative that the utmost care and consideration be given to oral and written history, present cultural users, and subsurface testing must be expanded before any activity is approved for the Petition Area.

Response: Please refer to the answer to Question #2 for discussion of the cultural preserve to be created.

22. The DEIS states "Kaneohe is noted for its striking topographic features

including the mountains...." Presently Oneawa Hills serves as a naturally vegetated buffer to urban Kaneohe any development will continue the urban creep. Removal of the natural vegetation on Oneawa Hills will reduce the areas effectiveness as a natural forest watershed, recharge area and become another urban landscape.

Response: Of the 56.5 acres, approximately 92% will continue to be pervious surfaces. The CWRM has indicated in their comment letter on the Draft EIS that they do not anticipate any impacts to the quantity of ground and surface water flows.

23. It is insufficient to state that "The mausoleums will not be visible from surrounding neighborhoods.... because Oneawa Hills, lower and upper sections, are visible from many areas and roads in Kaneohe, H-3 and Likelike Highway.

Response: Please refer to the answer to Question #2 for detailed discussion of the visual resources and impacts from the project.

24. The FEIS must identify the location of all culturally and ethnobotanical significant plants on maps along with plans for preservation and public access.

Response: Please refer to the answer to Question #19 above.

25. While the DEIS acknowledges the existence of many trails along Oneawa Hills including some that "could" be ancient it also states "All trail use of the property is unauthorized." Does that mean that if this area is developed that some/all trails will be closed to the public? This is a serious omission.

Response: Recreational trail use through private property such as the Petition Area is not protected. We have coordinated with DLNR, Na Ala Hele Trail and Access Program on the appropriate approach to the trail that appears to traverse part of the Petition Area. HMP has no obligation to maintain or provide amenities for the trail. HMP will certainly work to reasonably accommodate official hiking trails as long as respect for our families is shown. In addition, after consultation with DLNR, there are no ancient trails within the Petition Area.

26. This section states that during grading of the Petition Area "laua'e along with other plants growing in the area could be affected" but since there is no map showing where the significant plants are located or how many plants are within the Petition Area it impossible to evaluate the significance, extent or impact of the destruction of the plants. A full inventory of the significant

plants and their location within the Petition Area must be included in the FEIS.

Response: A full inventory of plants found during the Botanical Survey is included in the Botanical Survey, which was included in the EIS as Appendix D. Please refer to the answer to Question #19 regarding a figure showing locations of *laua'e*.

27. It is inadequate to say that "Those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds" because the vague language could exclude cultural practitioners, Hawaiian Civic Clubs, hula halau and others who have a cultural interest in the area.

Response: As noted in the EIS, the Petitioner has stated the intent to work with appropriate groups and individuals to appropriate protect and preserve the cultural resources on and near the Petition Area.

28. The FEIS must identify and include cultural organizations and individuals that will be consulted should there be any inadvertent cultural finds.

Response: This will be agreed upon during the preparation of the Preservation Plan for the Petition Area.

29. While saying that education programs will be mandatory the DEIS does not say who will create and provide those programs. It is imperative that the programs be created and conducted by individuals or organizations with cultural and historical knowledge of the area and they should be so identified in the FEIS.

Response: This will be agreed upon during the preparation of the Preservation Plan for the Petition Area.

30. Lipalu Street will be the only access to 20-lot subdivision yet there is no discussion on direct and indirect impacts of the additional cars, the ability of Lipalu Street to handle additional traffic, or the need for improvements to Lipalu Street. Is Lipalu Street a 44 ft wide street with two 12-ft wide travel lanes as the new access will be? If not, what is the aesthetic and funnel impact of traffic going from a wide street into a narrower street?

Response: As noted in the answer to Question #2 above, there will be no impacts to Lipalu Street from traffic as the residential portion of the Proposed Action will not be built.

31. The SSFM International report recounts that BWS has indicated that their

existing system serving the Lipalu Street area is unable to provide domestic water to the 20-lot residential subdivision and comfort station.

Response: As noted in several previous answers, there will be no need for potable water for the project, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.

32. The report further states that residential subdivisions can be located above their service limit if the property has frontage and the meter is placed 100' below the required service limit. These conditions cannot be met at the end of Lipalu St. as the existing elevations are approx 190', which will not be 100' below the 272' service limit. As a result the Petition Area cannot hook up to the existing Lipalu Street line and an on-site water system must be developed to provide domestic water service to the subdivision and comfort station. The DEIS provides no evidence that this has been done.

Response: Please refer to the answer to Question 31 above.

33. In letters to SSFM International BWS has stressed that the Applicant must investigate the feasibility of non-potable water sources prior to the use of potable water sources for irrigation. The DEIS does not provide any information showing that the Applicant has investigated the feasibility of on-site non-potable water sources.

Response: We have identified existing irrigation wells in the area serving Hawaii Veterans Cemetery. We believe that similar wells can be developed on-site at HMP. However, we cannot be absolutely certain of this resource until exploratory wells are drilled.

34. BWS does state that if a non-potable water source is not available or feasible a connection to Kumakua Place or another available BWS source may be a possible option. Yet, the DEIS provides no evidence that the Applicant has investigated the potential for on-site non-potable water sources.

Response: Our investigation has shown that the Veterans Cemetery uses wells nearby for irrigation of the cemetery. There is reasonable expectation that irrigation sources will be available from on-site wells. Definitive evidence will come from test wells at a later date.

35. The DEIS stresses that the only option for providing potable water to the residential subdivision and the cemetery restroom is to build an on-site water system. Yet, the DEIS does not discuss if any viable potable water source was found or where the wells would be located.

Response: Please refer to the answer to Question # 31 above.

36. While the DEIS states the following "The proposed on-site well systems constructed to supply irrigation water could also provide the necessary potable water supply if the water tests successfully for portability and/or if additional treatment onsite can improve minor deficiencies in the water to qualify potable levels" there is no evidence that any non-potable or potable water sources have been found in the Petition Area.

Response: Please refer to the answer to Questions # 33 and 34 above.

37. BWS sent three letters, 10/20/06, 12/15/06 and March 1, 2007 to SSFM International requesting that research be conducted to determine the feasibility of developing a non-potable water source for irrigation of the cemetery expansion. The DEIS did not identify or report that non-potable water sources for irrigation are available.

Response: We will not have complete confirmation of irrigation water availability until we drill a test well to determine availability. Our investigations have shown that the Veterans Cemetery is using wells nearby for irrigation of their cemetery. There is reasonable expectation that irrigation sources will be available for on-site wells.

38. BWS has indicated there is "ample water quantities and pressure should exist in association with the Kumakua Place system to fully service the approximately 30 acres of turf landscaping at full build out for the cemetery expansion area." BWS seems to be sending mixed messages. First, by requiring the Applicant to investigate potential on-site non-potable water for irrigation but second, if none is available there is the possibility that the Applicant could use potable water for irrigation. Is irrigation the best use of Hawaii's finite water resources?

Response: We note your concern regarding use of Hawaii's finite water resources. We would like to point out that the proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well, all of which will require little watering once established. In a typical year, very little supplemental irrigation is required for cemetery landscape areas, especially after plant material and turf has been established after a "grow-in" period of several months.

39. The SSFM International report is the first time that a "water treatment facility" is mentioned. Proposed water storage is shown on Figure 4 but there is no evidence of a "water treatment facility." The FEIS must provide details on the

"facility" such as location, use and identify potential impacts to the environment.

Response: Please refer to the answer to Question #31 above. The project will no longer require a water treatment facility.

40. The bottom line is that no permits should be considered or granted until: 1) viable on-site non-potable and potable water sources are identified, 2) the amount and quality of water available is known, 3) the amount of water to be withdrawn and the uses are known and 4) impacts from water withdrawal on the aquifer are understood.

Response: We note your comments on permit availability related to water. This not related to the project and is a policy decision made by both State and County regulatory agencies.

41. This section lists five sewer improvements and rehabilitation projects but does not state if all or any of the projects have been completed and are working satisfactorily to handle the additional sewage from the 20-lot subdivision and cemetery restroom. If the Applicant is relying on these improvements to justify and handle the additional sewage then it is imperative that these projects be completed before approvals are granted. This information must be provided in the FEIS. If development does not rely on these improvements then the Applicant must show that there is adequate capacity in the collection system, Aikahi Wastewater Treatment Plant, and existing 8-inch sewer line on Lipalu Street before any approvals to proceed are granted.

Response: The wastewater demands are now quite small, as the only need will be to service the restroom facility at one mausoleum.

42. Does the Lipalu Street 8-inch sewer line have excess capacity? If so, explain why there is additional capacity because it is our understanding that unless future hookup is anticipated sewer lines are not built with additional capacity.

Response: We stand by DPP's sewer connection approval.

43. Two statements seem contradictory. First, it is claimed that the 8-inch sewer line has excess capacity then it is stated "Development of the Petition Area will not commence until DPP confirms that adequate capacity exists." Which statement is true?

Response: Thank you for pointing out the contradictory statements within the EIS. The Final EIS has been clarified to explain that the existing 8-inch

sanitary sewer line in Lipalu Street has excess capacity to accommodate the new flows expected from the project, and the connection has been approved by the City and County of Honolulu DPP. Since the project no longer has a residential component the wastewater demands are now quite small, as the only need will be to service the restroom facility at one mausoleum.

44. At what stage of the planning process will DPP confirm that "adequate" wastewater capacity exists in the Lipalu Street line, collection system and Aikahi Wastewater Treatment Plant?

Response: The sewer connection approval was obtained during the preparation of the PER; the letter is dated May 2007. However, this issue is now moot with the abandonment of the residential subdivision.

45. Pg. 3-3 states "Development of the Petition Area will not commence until DPP confirms adequate capacity exists and approves both the project sewer master plan prepared for the project and the sewer connection permit." Elsewhere in the DEIS it is stated that DPP has approved the sewer connection permit. Which statement is correct?

Response: Thank you for pointing out the contradictory statements within the EIS. The Final EIS has been clarified to explain that the City and County of Honolulu DPP has approved the sewer connection permit.

46. The Petition Area lies within the Kawa Stream watershed and any development will only add to the approximately 40% of the watershed that contains impervious surfaces.

Response: Please refer to the answer to Questions #13 and 22 above.

47. Kaneohe Bay is designated as Class AA water body, providing the highest priority water quality protection. The Bay does not meet water quality standards set by EPA under the Clean Water Act. Removing the natural vegetation that creates the Oneawa Hills watershed and recharge area will only add to the degradation of Kawa Stream and Kaneohe Bay.

Response: Please refer to the answer to Question #13 above.

48. Kawa Stream is considered impaired by high levels of nutrients (nitrogen and phosphorus, turbidity) and suspended solids. Adding new areas that require fertilizers and pesticides will increase the nutrient levels.

Response: HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides are not used as a normal

cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

As noted in the EIS, the turf areas are treated with slow release turf fertilizers twice a year: in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. Impacts on groundwater are expected to be minimal. HMP will work to ensure groundwater impacts are minimized. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to UH's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application.

49. Pg. 6-15 The highest concentrations of nitrogen appear in the upper reaches of the stream, from the basins that make up the existing HMP, the residential housing and Hawaii State Veterans Cemetery.

Response: Please refer to the answer to Question #13 above. The design of the retention areas planned for the project will ensure that pollutant levels coming off of the cemetery expansion area will not increase from current levels.

50. Due to slope and low soil permeability associated with the Petition Area, the majority of storm water runoff currently generated during rain events discharges from the site as runoff rather than infiltrating into the soil. As a result of the cemetery expansion and residential development, total storm water runoff attributable to the Petition Area is expected to increase from 478 cfs to 520 cfs, an increase of 8.7%.

Response: As discussed above, the preferred alternative is Alternative III, Cemetery Only. Total storm water runoff attributable to the project will only increase from 478 cfs to 500 cfs, an increase of approximately 4%.

51. It is unclear what is meant by "Any increased runoff generated by the Proposed Action will be retained on-site for the county design storm event."

Response: As discussed in Section 1.3 of the EIS, "The county design storm event is based upon DPP's Rules Relating to Storm Drainage Standards of January 2000, which states that any increased runoff generated by a project be retained on-site for the duration of the 1-hour, 10-year storm event."

52. While Hawai'i Pacific University (HPU) is not adjacent to the Petition Area their proposal to increase dorm capacity to accommodate approximately 600 new students will have an impact on the capacity of Alkahi Wastewater Treatment Plant and should be considered when calculating the cumulative impacts of added sewage to the plant.

Response: We have not seen any documentation from HPU on wastewater generation. It will certainly affect the volume of wastewater at Alkahi. Nevertheless, this issue is no longer relevant with the decision not to develop the 20-lot residential subdivision.

53. It is incorrect to state that "In general, the topographic profile of the Petition Area will remain intact" since extensive grading must be done to level the terrain that ranges from 20% slopes to more than 30% slopes for housing, roads, the mausoleums and drainage swells. The cumulative impact on the natural environment and down slope residents of this massive grading and 73% vegetation removal must be evaluated.

Response: Thank you for pointing out an area of the EIS that was not completely clear. The Final EIS has been changed in several areas to disclose the future topographic profiles. Figures 28a and 28b have been updated to show the existing topographic profile along with the future profile that includes the retention areas and cemetery.

54. The cumulative impact of all four rockfall mitigation efforts must be evaluated.

Response: As disclosed in the EIS, the project will not exacerbate rockfall hazards, and will mitigate hazards affecting certain portions of the Petition Area.

55. It is incorrect to say that "The Proposed Action will not have a significant cumulative effect on Groundwater Resources" when research has not been conducted on the feasibility of wells for potable and non-potable use. Each well will draw down the water table so before any approvals are granted the number of wells needed to service the Petition Area, the use of the water (potable or non-potable) and the amount of water to be drawn from the wells in this ground water management area must be identified.

Response: We have already determined probable demand. The Commission on Water Resource Management, DLNR, will evaluate the request for wells associated with the Proposed Action.

56. It is incorrect to state that "The proposed action will not have a cumulative

effect on Natural Hazards" when four rockfall sites exist and will require some level of mitigation.

Response: Please refer to the answer to Question #54 above.

57. It is incorrect to claim that "The Proposed Action will not have a negative cumulative effect on historic, cultural, and archaeological resources" when extensive grading and grubbing will be done near/adjacent to eight known/discovered pre-contact and historic sites within the Project Area and four historical/cultural sites must be articulated in the FEIS.

Response: Please refer to the answer to Question #2.

58. It is not correct to say that "The Proposed Action will not have a cumulative negative impact on traditional customs and practices" because location of plants have not been identified, access to existing and currently used trails has not been address, continued access for gathering and cultural practices including caring for historic sites has not been discussed.

Response: Please refer to the answer to Question #2.

59. The FEIS must discuss how feasible it is that cultural practitioners or hikers will traverse the cemetery to get to their destination?

Response: Please refer to the answer to Questions #2 and 25.

60. What are the cumulative impacts from increased storm water flow and increased wind velocity on neighboring properties once the forest coverage is removed and human activities such as lawn maintenance and use of pesticides increased?

Response: The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

The interface between the proposed project and existing residences will be tempered by the retention of a generous vegetative buffer of at least 50 feet and frequently in excess of 100 feet. This will provide a wind break and shade as well as a visual buffer for HMP neighbors.

61. What is the cumulative impact of increased impervious surfaces that will reduce rainwater infiltration into the underlying aquifer?

Response: Please refer to the answer to Question #22 above. Impacts are not expected to be significant.

62. Impacts from increased impervious surfaces on reduced infiltration into the underlying aquifer and increased overland flow to down slope residential areas, Kawa Stream and eventually the coast must be thoroughly evaluated in the FEIS.

Response: Please refer to the answer to Questions #22 and 60 above.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 18, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

As a long-time Kaneohe resident, I am seriously concerned about any additional expansion of Hawaiian Memorial Park. We are the original owners of our home on Lipalu Street. We have made our home here for the past 45 years. Lipalu Street has been a quiet, pleasant neighborhood to live. The dead end street has afforded us a peaceful and tranquil existence due to limited traffic in our area. Your proposal to build a subdivision with 20 additional homes is extremely troubling to us. Currently, there are 17 houses on Lipalu Street, including the cul-de-sac. A drastic increase in traffic on Lipalu Street is unacceptable. Maintaining our present quality of life is vitally important to us. As we grow older, we do not want a lot of change that will negatively affect our lives.

Equally important to us is maintaining the natural beauty of Mahinui mountain. We abhor the idea of your proposal to excavate the ridge, which will in all probability cause our neighborhood problems, such as flooding, traffic, noise, crime and pollution, to list a few. The natural balance of the environment and wildlife may also be irreparably damaged. We implore the State Land Use Commission to do the right thing and "Save Kaneohe".

What assurances can you provide us that our neighborhood will remain tranquil and serene?

What assurances are there that our neighborhood will remain safe?

Who is going to be liable for any loss of property or damage should a perpetrator enter from your property?

What assurances can you make that the young children that often play on our street will remain free from danger?

Is Lipalu Street the only viable access to your proposed new subdivision?

What will happen to the concrete drainage canal at the end of Lipalu Street? Will any modification to the drainage canal pose a flooding problem?

What is the necessity for a nearly nine billion-dollar company to construct 20 houses in our neighborhood for seed money for your proposed "graveyard" expansion?

What is the projections regarding the average size and cost of the proposed residences?

Will the average cost of these residences increase our property tax?

Should your expansion project miraculously more forward, can the nearly \$250 million in profit that SCI made last year be used for the proposed graveyard expansion?

What guarantees can you make that large construction trucks, bulldozers and heavy equipment will not be going back and forth on Lipalu Street during this expansion period?

Mr. Jay Morford  
July 18, 2008  
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What assurances can you make to be sure that we will be protected from dust, noise, pollution and exhaust fumes?  
Will Lipalu Street be used as an access road during this expansion period?  
Are we and the neighbors living on Lipalu Street going to be negatively impacted in any way during your proposed 20 year long expansion project? In other words, are we going to be subjected to noise, dust, traffic and pollution for the next 20 years?

We are deeply concerned and troubled by the proposed Hawaiian Memorial expansion. The view of the ridge is beautiful from all parts of Kaneohe. Any further expansion will mar the natural beauty of our neighborhood. The recently built Oceanview Garden pavilion is clearly visible from Mokulele Drive.

Are there any guarantees that construction of additional pavilions, gazebos and mausoleums will not be a future and continuing eyesore to the neighborhood?

What assurances can you provide us that any future construction of structures in your expansion plan will not be visible and a blight on the scenic natural beauty of our ridge?  
Will the proposed water storage tank be visible from our surrounding neighborhood?

What assurances can you provide that additional grading of the ridge will not create a flood problem for the residents below? Do you recall the 40 days of rain we had on the windward side a couple years ago?

Who is going to be liable for any future damage caused by flooding?  
Will you promise to retrieve any "loose" caskets should the steep hillside behind our neighboring property give way following a sustained deluge?  
Will the water table and ground water be compromised by destroying the trees and grading the ridge?

Will the under ground streams be damaged by this grading?

What guarantees are in place that drilling of a well will not damage the aquifer and compromise Kawa Stream.

Can you guarantee that any runoff of Kawa Stream will not damage Kaneohe Bay?

Will the use of pesticides and fertilizer contaminate the ground water?

Will there be any assurances that contaminants will endanger our property?  
Has there been a comprehensive and accurate study regarding the affects of excess rain runoff?

Is there a plan to monitor such runoff in the future?

Will the proposed ponds be sufficient to accommodate additional rain runoff?

A pond is projected to be installed just above our residential property. Should the pond over flow, what provisions will be in place to prevent flooding?

Will the pond be a breeding ground for insects, such as mosquitoes and the danger of dengue fever?

Standing water and drainage is a breeding area for toads. How will you manage an infestation of toads?

Mr. Jay Morford  
July 18, 2008  
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Will the additional ponds and surrounding area present a possible breeding ground and safe haven for coqui frogs?

Will the creation of open space by the proposed grading bring feral pigs closer to our neighborhood and residences?

What will be the impact on the indigenous and endemic floral/fauna during and after the grading and removal of all the trees?

How will this expansion project affect the Hawaiian bird population?

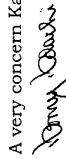
How will the removal of the trees affect the wind pattern during hurricane force winds?

Will the removal of trees cause the neighboring community to be more vulnerable to high winds?

Stray feral cats have always been a problem in the cemetery. What guarantees can you provide that similar problems will not continue and affect our neighborhood?

How will you manage the problem of chickens and roosters that appear to thrive in the cemetery?

Expansion to Hawaiian Memorial Park will destroy the nature beauty of Mahimui and the ridge below forever. My only hope is that our voices can be heard before we hear the sound of bulldozers and toppling trees. Thank you for your consideration and have a nice day.

A very concern Kaneohe resident  
  
Henry Adachi

c: Office of Environment Quality Control

Helber Hastert & Fee, Planners

Land Use Commission, State of Hawaii

Hui O' Pikoiloa

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Henry Adachi  
No address provided

Dear Mr. Adachi:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii



Thank you for your letter dated July 18, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. As a long-time Kaneohe resident, I am seriously concerned about any additional expansion of Hawaiian Memorial Park.  
Response: We note your opposition to the Proposed Action.
2. A drastic increase in traffic on Lipalu Street is unacceptable. Maintaining our present quality of life is vitally important to us. Equally important to us is maintaining the natural beauty of Mahinui Mountain. We abhor the idea of your proposal to excavate the ridge, which will in all probability cause our neighborhood problems, such as flooding, traffic, noise, crime and pollution, to list a few. The natural balance of the environment and wildlife may also be irreparably damaged. What assurances can you provide us that our neighborhood will remain tranquil and serene?  
Response: There are expected to be no impacts from traffic through Lipalu Street and the surrounding neighborhood, as the Petitioner has modified the development program for the project and eliminated the residential subdivision and the Lipalu Street extension from the project.

Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the Environmental Impact Statement (EIS), Scenic and Visual Resources, and demonstrated in several

graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

We are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Retention areas are included in the Concept Plan as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm). The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS and are summarized below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned



and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

3. What assurances are there that our neighborhood will remain safe? Who is going to be liable for any loss of property or damage should a perpetrator enter from your property? What assurances can you make that the young children that often play on our street will remain free from danger?

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

Questions of liability would be addressed on a case by case basis.

4. Is Lipalu Street the only viable access to your proposed new subdivision? What will happen to the concrete drainage canal at the end of Lipalu Street? Will any modification to the drainage canal pose a flooding problem?

Response: As discussed in #2 above, the residential portion of the Proposed Action will not be built. The drainage canal at the end of Lipalu Street will not be modified.

5. What is the necessity to construct 20 houses in our neighborhood for seed money for your proposed "graveyard" expansion?

Response: As discussed in #2 above, the residential subdivision has been eliminated from the development program.

6. What is the projections regarding the average size and cost of the proposed residences?

Response: Please refer to the answer to Question #2 above.

7. Will the average cost of these residences increase our property tax?

Response: There is not expected to be any increase in property tax to the surrounding neighborhood.

8. What guarantees can you make that large construction trucks, bulldozers and heavy equipment will not be going back and forth on Lipalu Street during this expansion period? What assurances can you make to be sure that we will be protected from dust, noise, pollution and exhaust fumes? Will Lipalu Street be used as an access road during this expansion period? Are we and the neighbors living on Lipalu Street going to be negatively impacted in any way during your proposed 20 year long expansion project?

Response: As discussed above, there will be no use of Lipalu Street related to the project. Construction on the cemetery expansion will not last 20 years. Construction will proceed in phases separated by several years. Each phase will last approximately six months. Construction related impacts are controlled by Chapter 46, Hawaii Administrative Rules, Community Noise Control. Please also see answer to Question #2 above for more noise information.

Impacts from dust will be minimized by using several Best Management Practices such as watering, mulching, and temporary vegetation. Impacts to the surrounding neighborhood from the Proposed Action are disclosed and discussed in the EIS along with suggested mitigation in accordance with Chapter 343, Hawaii Revised Statutes.

9. The view of the ridge is beautiful from all parts of Kaneohe. Any further expansion will mar the natural beauty of our neighborhood. The recently built Oceanview Garden pavilion is clearly visible from Mokulele Drive. Are there any guarantees that construction of additional pavilions, gazebos and mausoleums will not be a future and continuing eyesore to the neighborhood?

Response: Please refer to the answer to Question #2 above for discussion of the visual analysis for the project. Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Where the mausoleums are visible, they appear as a minor element of the watershed. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.

10. Will the proposed water storage tank be visible from our surrounding neighborhood?

Response: The water storage tank will not be built as the residential portion of the project has been eliminated.

11. What assurances can you provide that additional grading of the ridge will not create a flood problem for the residents below? Do you recall the 40 days of rain we had on the windward side a couple years ago? Who is going to be liable for any future damage caused by flooding?

Response: We are uncertain which ridge you are referring to. The main Oneawa Hills ridge will not be graded, as it is not within the Petition Area. Smaller ridges within the Petition Area will be graded. Any grading will have to be part of the grading permit, to be approved by DPP Civil Engineering Branch.

12. Will you promise to retrieve any "loose" caskets should the steep hillside behind our neighboring property give way following a sustained deluge?

Response: The design of the cemetery is intended to ensure that the hillside behind your neighborhood does not 'give way'. The results of the slope stability report performed for the EIS are described in Section 4.6.2. There was found to be no potential for hazards associated with slope stability.

13. Will the water table and ground water be compromised by destroying the trees and grading the ridge?

Response: Groundwater resources are regulated by the Commission on Water Resource Management (CWRM), which is administratively assigned to the Department of Land and Natural Resources. The CWRM establishes

sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11, HAR. According to the comment letter from CWRM for the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

14. Will the under ground streams be damaged by this grading?

Response: We are unsure which underground streams you are referring to. Please refer to the answer to Question #13 above for a discussion of groundwater.

15. What guarantees are in place that drilling of a well will not damage the aquifer and compromise Kawa Stream.

Response: The CWRM will take this into consideration to ensure that a well will not damage the aquifer or Kawa Stream.

16. Can you guarantee that any runoff of Kawa Stream will not damage Kaneohe Bay?

Response: The proposed project is helping to improve the water quality of Kawa Stream and ultimately Kaneohe Bay (see Section 6.4 of the EIS for a more detailed discussion). The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the DPP's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kawa Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kawa Stream system.

17. Will the use of pesticides and fertilizer contaminate the ground water? Will there be any assurances that contaminants will endanger our property?

Response: Impacts on groundwater are expected to be minimal. HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation

should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

The turf areas are treated with slow release turf fertilizers twice a year; in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. HMP will work to ensure groundwater impacts are minimized. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to UH's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application.

18. Has there been a comprehensive and accurate study regarding the affects of excess rain runoff? Is there a plan to monitor such runoff in the future?

Response: Section 6.4 of the EIS discusses the results of the Preliminary Engineering Report (PER), which examined the runoff coefficients and expected changes related to the project. The PER itself is attached as Appendix C to the EIS.

19. Will the proposed ponds be sufficient to accommodate additional rain runoff? A pond is projected to be installed just above our residential property. Should the pond over flow, what provisions will be in place to prevent flooding? Will the pond be a breeding ground for insects, such as mosquitoes and the danger of dengue fever?

Response: Retention areas are not permanent ponds or dams of water, and will be approved by the DPP. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters, and includes a wide variety of individual design techniques that can be used in appropriate circumstances. Properly designed and maintained retention areas are not suitable habitat for mosquitoes. Exact design criteria for the retention areas and appropriate substrate treatment will be determined after percolation tests are done on the soils. Proper design for retention areas ensures that water does not remain longer than three days; mosquitoes cannot complete a breeding cycle in this short of a time period. The project will include a Drainage Maintenance Plan that spells out the monitoring and maintenance protocol for the retention areas. Overall, the maintenance measures undertaken to meet water quality goals will also act to ensure these retention areas do not become mosquito breeding habitats.

20. Standing water and drainage is a breeding area for loads. How will you manage an infestation of loads? Will the additional ponds and surrounding area present a possible breeding ground and safe haven for coqui frogs?

Response: Please refer to the answer to question #22 above. Infestation by loads or frogs are not expected in relation to the Proposed Action.

21. Will the creation of open space by the proposed grading bring feral pigs closer to our neighborhood and residences?

Response: There are not expected to be any impacts from pigs related to the Proposed Action.

22. What will be the impact on the indigenous and endemic floral/fauna during and after the grading and removal of all the trees? How will this expansion project affect the Hawaiian bird population?

Response: The Petition Area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic. The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

As discussed in Section 4.8 of the EIS, Fauna, the project is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area.

23. How will the removal of the trees affect the wind pattern during hurricane force



STATE OF HAWAII  
OFFICE OF HAWAIIAN AFFAIRS  
711 KAPI'OLANI BOULEVARD, SUITE 500  
HONOLULU, HAWAII 96813

HRD08/2939D

winds? Will the removal of trees cause the neighboring community to be more vulnerable to high winds?

Response: The interface between the proposed project and existing residences will be tempered by the retention of a generous vegetative buffer of at least 50 feet. This will provide a wind break and shade as well as a visual buffer for HMP neighbors, and there are not expected to be any impacts during hurricane force winds.

24. Stray feral cats have always been a problem in the cemetery. What guarantees can you provide that similar problems will not continue and affect our neighborhood? How will you manage the problem of chickens and roosters that appear to thrive in the cemetery?

Response: In addition to helping to educate the community about the problems created by improper release of pet animals to the wild, we are considering humane methods for controlling feral animal populations. For the cats, two options are being looked at: a Trap Neuter and Return program, or trapping the animals and taking them to the humane society. The chickens and roosters are an island wide problem. HMP is looking into an organization that may be able to trap and remove the chickens and roosters.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford; Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 18, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakoa Street  
Honolulu, Hawaii 96813

RE: Request for comments on the proposed Hawaiian Memorial Park Cemetery expansion and draft environmental impact statement (DEIS), Ko'olau Poko District, O'ahu, TMK: 4-5-033:001 por. 001.

Aloha e Jay Morford,

The Office of Hawaiian Affairs (OHA) is in receipt of the above-mentioned letter dated June 6, 2008. OHA has reviewed the project and offers the following comments.

OHA is pleased that as we mentioned in our previous September 27, 2007 letter, the applicant agrees that a comprehensive archaeological inventory survey for the project area should be conducted and submitted to the Department of Land and Natural Resources- Historic Preservation Division for review and approval. However, we have not been allowed the opportunity to comment on the criteria assigned to any cultural or archaeological sites identified within the archaeological inventory survey pursuant to §13-284-6(c), Hawai'i Administrative Rules. We ask that we be allowed to do so.

Review of this applicant's proposals is important due to the clear obfuscation OHA found in this environmental review. Regarding the archeological sites, Page 1-7 of the DEIS states "All significant archeological sites within and near the Petition Area will be preserved and buffer zones incorporated." Also, pages 3-1 and 3-2 claim that, "there are several significant historical sites located in the Petition Area which will be preserved, with appropriate buffering dimensions."

However, OHA points to the stunning omission of archeological sites from the applicant's *Conceptual Grading Plan* in Appendix C. Historic sites 4686A and 4686B,

which are listed in the applicant's *Conceptual Site Plan* in Appendix C, are not only missing from the *Conceptual Grading Plan*, but are shown to actually be graded over. OHA also sees these two sites listed in Tables 1, 3 and 4 of this DEIS, indicating that even the applicant realizes their significance. Therefore, OHA strongly urges that the applicant disclose in Tables 1 and 4 that the term "No further work" under the heading "Mitigation Recommended" (as is listed for these and three other sites) in reality includes grading over and putting roadways, mausoleums, or housing on top of them as proposed in Appendix C.

This applicant consistently qualifies their statements regarding what are actual responsibilities and duties. For example page 1-8 of the DEIS for mitigation measures states

1. integration of cemetery plans and design with the cultural significance of significant archeological sites and cultural features;
3. all cultural properties and archeological sites in and near the Petition Area will be investigated, preserved, and protected through creation of kipuka as appropriate;
8. on-going cultural practices... will be recognized and accommodated (subject to safety and liability issues) as provided by law;
9. areas where the hula plant lau'a'e (Phymatosorus grossus) is most concentrated will be protected to the degree feasible and practicable; (emphases added)

OHA points out that it is not solely up to the applicant to determine what is significant, appropriate or feasible and practicable.

Additionally, the applicant must be consistent and open with what they propose to do so that reviewers of this environmental disclosure document will be able to not only assess the proposed project for potential impacts, but also offer suggestions for mitigations and improvements. For example, the applicant states in the DEIS on page 1-8 number 7, "archeological monitoring will be conducted during all phases of development". (emphasis added) However, on page 4-37 it states, "Should SHPD require archeological monitoring for the project, and archeological monitoring plan, written to fulfill the requirements of HAR Chapter 13-279, will be reviewed for approval by SHPD prior to any land disturbing activities within the Petition Area." (emphasis added) OHA points out that the applicant is free to honor their commitment to archeological monitoring regardless of the State Historic Preservation Division.

Further, the applicant's own tables reflect a disturbing confusion regarding archeological sites within or near the project area. Table 3 lists site 6931 as being both within the Petition Area and near the petition area while Table 1 lists the site as only near the Petition Area and Table 4 lists it as being in the vicinity.

OHA also inquires as to the practicality of leaving kipuka of lau'a'e in the project area for hula halau to practice their constitutionally protected traditional and customary gathering rights. One issue is the basic biology of this plant which may not be suited to the new type of environment that the applicant wishes to create. Another more subtle issue is the cultural concern of gathering and making lei from plants found in a graveyard. OHA asks if the biological feasibility of preserving this fern in an isolated and homogenous environment has been assessed with a botanist and if cultural practitioners were made aware of the presence of iwi kipuna near the plants. We also note that no locations to accommodate these protected rights have been delineated in this DEIS, and OHA is not comfortable relying on the applicant's assurances.<sup>1</sup>

OHA further objects to the misleading title of this project. OHA was surprised by the unforeseen fact that some 25% portion of this *Hawaiian Memorial Park Cemetery Expansion* actually is to be subdivided into 20 single family house lots.<sup>2</sup> These are two entirely separate uses and proposals and the housing part should not be tucked neatly away inside the environmental review.<sup>3</sup> Therefore, OHA suggests that the applicant include this proposal in the title for transparency's sake.

Additionally, OHA stresses that the objective of the state land use classification of Conservation is "protecting watersheds, water resources, and water supplies".<sup>4</sup> Further, the Conservation district "shall include lands necessary for the conservation, preservation, and enhancement of scenic, cultural, historic, or archaeological sites and sites of unique physiographic or ecologic significance".<sup>5</sup> Because these lands are classified as Conservation lands, the state land use commission must have recognized the inherent qualities mentioned above that are contained in these lands.

OHA points out that these important qualities are still present and are perhaps even more relevant. Of particular note is the large number of archeological sites on the subject parcel. Further, OHA points out that the objective of the Limited subzone is "to limit uses where natural conditions suggest constraint on human activities".<sup>6</sup> What the applicant fails to disclose is that this cautionary classification is used for "lands

<sup>1</sup> DEIS, page 3-2.

<sup>2</sup> DEIS, pages 2-2 and 2-3.

<sup>3</sup> As was done for the Department of Planning and Permitting approved a sewer connection application in April of 2007.

<sup>4</sup> Hawaii Administrative Rules (HAR), §15-15-20 (1).

<sup>5</sup> HAR, §15-15-20 (4).

<sup>6</sup> HAR, §13-5-12(a) and DEIS, page 3-6.

susceptible to floods and soil erosion, lands undergoing major erosion damage and requiring corrective action" and "lands necessary for the protection of the health, safety, and welfare of the public".<sup>7</sup>

The applicant intends to remove 40% of the subject parcel from the Conservation district and not only place an expanded cemetery there but also houses in an area with a Limited subzone. OHA fails to see how the proposed action will not run afoul of existing land use laws intended to conserve the land and safeguard the welfare of the general public. OHA further inquires if the applicant had a permit or site plan approval for their data collection activities on the subject parcel involving ground disturbing activities as mentioned in the DEIS and as required by HAR Section 13-5-22 for such activities.<sup>8</sup>

OHA also points out that according to HAR §15-15-18(1) *Standards for determining "U" urban district boundaries*, the following shall apply, "It shall include lands characterized by "city-like" concentrations of people, structures, streets, urban level of services and other related land uses".

OHA understands that this project will require the installation of a roadway system, underground utilities, water, sewer, electric, telephone, and cable services. Further, it has not been determined that adequate capacity exists for needed wastewater disposal.<sup>9</sup> All of this evidences the fact that this area is not "city-like" and without the availability of basic services as required by HAR to re-designate it has urban. In fact, the applicant's own DEIS on page 3-4 states that this area has not even been used for even limited agriculture since 1982.<sup>10</sup>

HAR §15-15-18(1)(B) *Standards for determining "U" urban district boundaries* requires that "Availability of basic services such as... wastewater systems, solid waste disposal, drainage, water...and public utilities" be specifically considered. However, the applicant states on page 6-10 that the Board of Water Supply cannot service this proposed project and that the "only viable option for providing potable water for the subdivision is the creation of an on-site water system." In addition, the DEIS states on page 6-21 that "The Petition Area does not have any existing power or communication facilities as it is currently an undeveloped property." (Emphasis added)

Therefore, OHA urges that the reasons this land was designated as Conservation and put in a Limited subzone still apply as the applicant's own document illustrates. Furthermore, OHA understands that the master plan for this area actually calls for the expansion of conservation land in the project area. OHA also inquires as to how the Department of Planning and Permitting approved a sewer connection application in April

<sup>7</sup> HAR, §13-5-12 (b) 1 and 2.

<sup>8</sup> See DEIS, page 4-35 which states that subsurface testing was done.

<sup>9</sup> DEIS, page 3-3.

<sup>10</sup> DEIS, page 3-4.

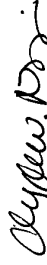
of 2007 for a "20-lot subdivision (one dwelling per lot) and a comfort station for the cemetery expansion project" on lands that specifically do not permit these uses.<sup>11</sup>

Also, OHA notes that Kāne'ōhe Bay, which would receive waters discharged from this site via the He'eia fishpond, is designated as a class AA water body. Class AA waters have regulations against discharge to protect the waters in a natural pristine state with an absolute minimum pollution or alteration of water quality from any human source or action, according to the state Department of Health. OHA inquires as to the applicant's compliance with federal and state water quality regulations.

OHA further inquires as to the status of the water allocation for the proposed project from the Board of Water Supply. Because this area is a water management area (which also indicates that it should remain in Conservation), HAR §13-171-13 requires that the applicant shall establish that the proposed use of water can be accommodated with the available water source (which has not been done) and that it is consistent with state and county general plans and land use designations (which it is not) as well as county land use plans and policies (of which a significant amount are violated). The applicant must also establish that the water use is reasonable-beneficial, which is defined in HAR §13-171-2 as being not wasteful and "is both reasonable and consistent with the state and county land use plans and the public interest." OHA again states that the applicant's proposed use is not consistent with the subject property's current land use designation or in reasonable keeping land use plans. Certainly, putting houses in a Limited subzone is, at face value, also a risk to the public interest.

Thank you for the opportunity to comment and we look forward to reviewing the DEA. If you have further questions, please contact Grant Arnold (808) 594-0263 or e-mail him at [granta@oha.org](mailto:granta@oha.org).

'O wau iho nō me ka 'ōia 'i'o,



Clyde W. Nāmu'o  
Administrator

C: Office of Environmental Quality Control  
235 S. Beretania St., Suite 702  
Honolulu, Hawai'i 96813

<sup>11</sup> DEIS, Appendix C.

C: Clean Water Branch  
Environmental Management Division  
State Department of Health  
P.O. Box 3378  
Honolulu, Hawaii 96801-3378

C: Land Use Commission  
P.O. Box 2359  
Honolulu Hawaii 96804-2359

C: Office of Planning, State of Hawaii  
Department of Business, Economic Development and Tourism  
PO Box 2359  
Honolulu, Hawaii 96804-2359

✓ C: Helber, Hastert & Fee Planners  
733 Bishop Street, Suite 2590  
Honolulu, Hawaii 96813

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Clyde W. Nāmu'o  
Administrator  
Office of Hawaiian Affairs  
711 Kapi'olani Blvd., Suite 500  
Honolulu, HI 96813

Dear Mr. Nāmu'o:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'one, O'ahu, Hawaii

Thank you for your letter dated July 18, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. OHA is pleased that as we mentioned in our previous September 27, 2007 letter, the applicant agrees that a comprehensive archaeological inventory survey for the project area should be conducted and submitted to the Department of Land and Natural Resources- Historic Preservation Division for review and approval. However, we have not been allowed the opportunity to comment on the criteria assigned to any cultural or archaeological sites identified within the archaeological inventory survey pursuant to § 13-284-6(c), Hawaii Administrative Rules. We ask that we be allowed to do so.

Response: The Archaeological Inventory Survey (AIS) completed for the Project Area was included as Appendix F in the Draft EIS, which was distributed to OHA for review and comment on June 6, 2008. Additionally, OHA will be consulted in the near future on the AIS.

2. Review of this applicant's proposals is important due to the clear obfuscation OHA found in this environmental review. Regarding the archaeological sites, Page 1-7 of the DEIS states "All significant archeological sites within and near the Petition Area will be preserved and buffer zones incorporated." Also, pages 3-1 and 3-2 claim that, "there are several significant historical sites located in the Petition Area which will be



preserved, with appropriate buffering dimensions." However, OHA points to the stunning omission of archeological sites from the applicant's *Conceptual Grading Plan* in Appendix C. Historic sites 4686A and 4686B, which are listed in the applicant's *Conceptual Site Plan* in Appendix C, are not only missing from the *Conceptual Grading Plan*, but are shown to actually be graded over. OHA also sees these two sites listed in Tables 1, 3 and 4 of this DEIS, indicating that even the applicant realizes their significance. Therefore, OHA strongly urges that the applicant disclose in Tables 1 and 4 that the term "No further work" under the heading "Mitigation Recommended" (as is listed for these and three other sites) in reality includes grading over and putting roadways, mausoleums, or housing on top of them as proposed in Appendix C.

Response: State Historic Preservation District rules and recommendations for site treatment are fairly general, and there are three categories: preservation, data recovery, and no further work. As discussed in the EIS, evaluation of these sites (4686A and 4686B) indicates a loss of integrity as a result of trash dumping and other despoiling of the area. It is intended that these sites will not be preserved.

3. This applicant consistently qualifies their statements regarding what are actually responsibilities and duties. For example page 1-8 of the DEIS for mitigation measures states: #1 integration of cemetery plans and design with the cultural significance of significant archeological sites and cultural features; #3 all cultural properties and archeological sites in and near the Petition Area will be investigated, preserved, and protected through creation of kipuka as appropriate; #8 on-going cultural practices...will be recognized and accommodated (subject to safety and liability issues) as provided by law; #9 areas where the hula plant laua'e (Phymatosorous grossus) is most concentrated will be protected to the degree feasible and practicable (emphases added)

OHA points out that it is not solely up to the applicant to determine what is significant, appropriate or feasible and practicable.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archeological Inventory Survey and the Cultural Impact Assessment. We acknowledge that these mitigation measures must be agreed upon by SHPD.

The landowner is also clearly aware of the need to recognize traditional gathering rights on the property. Up to this point, in time, we have been unsuccessful with our attempts to have groups come forward and identify where they are gathering laua'e. However, since the publication of the Draft EIS, we have sent our botanist back into the field to identify the locations of areas characterized by lush growth of laua'e. In this context, we have modified the Proposed Action to incorporate a 9.4-acre cultural preserve area within the Petition Area that will include areas where laua'e is plentiful, and will also include five archaeological sites east of Kawa'ewa'e Heiau. This area will remain in its present "natural" state, except for a modest access road. We have attached a copy of the revised plan showing the location of the cultural preserve. This plan also includes the elimination of the 20-lot residential subdivision originally included in the Proposed Action.

4. Additionally, the applicant must be consistent and open with what they propose to do so that reviewers of this environmental disclosure document will be able to not only assess the proposed project for potential impacts, but also offer suggestions for mitigations and improvements. For example, the applicant states in the DEIS on page 1-8 number 7, "archeological monitoring will be conducted during all phases of development". (emphasis added) However, on page 4-37 it states, "Should SHPD require archeological monitoring for the project, and archeological monitoring plan, written to fulfill the requirements of HAR Chapter 13-279, will be reviewed for approval by SHPD prior to any land disturbing activities within the Petition Area." (emphasis added) OHA points out that the applicant is free to honor their commitment to archeological monitoring regardless of the State Historic Preservation Division.

Response: Thank you for pointing out an inconsistency within the EIS. The Final EIS has been clarified on page 4-37 to remove the wording "should SHPD require archeological monitoring" and simply states that archeological monitoring will occur.

5. Table 3 lists site 6931 as being both within the Petition Area and near the petition area while Table 1 lists the site as only near the Petition Area and Table 4 lists it as being in the vicinity.

Response: Thank you for pointing out an inconsistency within the EIS. The Final EIS has been changed so that Table 3 only lists site 6931 as being located near the Petition Area.



6. OHA also inquires as to the practicality of leaving Kipuka of Iauā'e in the project area for hula halau to practice their constitutionally protected traditional and customary gathering rights. One issue is the basic biology of this plant which may not be suited to the new type of environment that the applicant wishes to create. Another more subtle issue is the cultural concern of gathering and making lei from plants found in a graveyard. OHA asks if the biological feasibility of preserving this fern in an isolated and homogenous environment has been assessed with a botanist and if cultural practitioners were made aware of the presence of iwi kupuna near the plants. We also note that no locations to accommodate these protected rights have been delineated in this DEIS, and OHA is not comfortable relying on the applicant's assurances.

Response: Please refer to the answer to Question #3 above for a discussion of the cultural preserve area that will include areas where Iauā'e is plentiful.

7. OHA further objects to the misleading title of this project. OHA was surprised by the unforeseen fact that some 25% portion of this *Hawaiian Memorial Park Cemetery Expansion* actually is to be subdivided into 20 single family house lots. These are two entirely separate uses and proposals and the housing part should not be tucked neatly away inside the environmental review. Therefore, OHA suggests that the applicant include this proposal in the title for transparency's sake.

Response: The title of the project will not be changed as the residential portion of the Proposed Action has been abandoned. The Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative, and the petition for boundary amendment will be modified accordingly.

8. Additionally, OHA stresses that the objective of the state land use classification of Conservation is "protecting watersheds, water resources, and water supplies". Further, the Conservation district "shall include lands necessary for the conservation, preservation, and enhancement of scenic, cultural, historic, or archaeological sites and sites of unique physiographic or ecological significance". Because these lands are classified as Conservation lands, the state land use commission must have recognized the inherent qualities mentioned above that are contained in these lands.

Response: There is no record of the specific reasons the Petition Area was initially designated as Conservation land. It is probable that a large factor affecting its designation was that fact that the property was a large tract of open space. Section 3.1.3 of the EIS discusses the project in relation to the State Land Use districts. The land use is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. Uses for land must change over time to accommodate community services. This is just such a case.

9. OHA points out that these important qualities are still present and are perhaps even more relevant. Of particular note is the large number of archeological sites on the subject parcel. Further, OHA points out that the objective of the Limited subzone is "to limit uses where natural conditions suggest constraint on human activities." What the applicant fails to disclose is that this cautionary classification is used for "lands susceptible to floods and soil erosion, lands undergoing major erosion damage and requiring corrective action" and "lands necessary for the protection of the health, safety, and welfare of the public".

Response: The Final EIS includes additional language related to the Limited subzone, which is summarized below. The objective of the Limited subzone is "to limit uses where natural conditions suggest constraints on human activities" (§13-5-12 (a), HAR). Cemetery uses are not permitted in the State Conservation District; therefore a re-designation to the State Urban District by the State Land Use Commission is being sought.

Only 17% (9.6 acres) of the Petition Area is located in the Limited subzone, and 4.7 acres of this total will be located within the cultural preserve area, and will not be changed from its existing character except for an access road. Therefore, of the total 56.5-acre Petition Area, only 4.9 acres (8.7%) within the Limited subzone will be converted to cemetery use under the revision to the Proposed Action. The majority of the area will be open space (cemetery use), and human activity will be minimal in the steep sloped areas. The results of the Slope Stability and Rockfall Hazard performed for this EIS are discussed further in Sections 4.2 and 4.6, and the entire report is attached as Appendix B. The slope stability analysis found there to be no apparent potential for hazards associated with slope stability. Most slopes in the Petition Area are less than 20%; although some land with higher slope will need to be graded in order to

ensure all land within the Petition Area is stable. Most of these steeper lands will be revegetated and not used for burials, and therefore will not be areas where human activity is expected. There is a potential for hazards associated with rockfall, but these can be mitigated using available technology.

10. The applicant intends to remove 40% of the subject parcel from the Conservation district and not only place an expanded cemetery there but also houses in an area with a Limited subzone. OHA fails to see how the proposed action will not run afoul of existing land use laws intended to conserve the land and safeguard the welfare of the general public.

Response: Please refer to the answer to Question # 7 above, as the residential portion of the project has been abandoned.

11. OHA further inquires if the applicant had a permit or site plan approval for their data collection activities on the subject parcel involving ground disturbing activities as mentioned in the DEIS and as required by HAR Section 13-5-22 for such activities.

Response: We believe that Section 13-5-22 allows basic data collection, research, education, and resource evaluation without a permit, as provided in subparagraph (b), that does not involve a land use.

12. OHA also points out that according to HAR §15-15-18(1) Standards for determining "U" urban district boundaries, the following shall apply, "It shall include lands characterized by 'city-like' concentrations of people, structures, streets, urban level of services and other related land uses". OHA understands that this project will require the installation of a roadway system, underground utilities, water, sewer, electric, telephone, and cable services. Further, it has not been determined that adequate capacity even exists for needed wastewater disposal. All of this evidences the fact that this area is not "city-like" and without the availability of basic services as required by HAR to re-designate it has urban. In fact, the applicant's own DEIS on page 3-4 states that this area has not even been used for even limited agriculture since 1982.

Response: The Draft EIS discusses in detail the State Land Use urban district standards in Section 3.1.3., and the project in relationship to these.

13. HAR §15-15-18(1)(B) Standards for determining "U" urban district boundaries requires that "Availability of basic services such as... wastewater systems, solid waste disposal, drainage, water... and public utilities" be specifically considered. However, the applicant states on page 6-10 that the Board of Water Supply cannot service this proposed project and that the "only viable option for providing potable water for the subdivision is the creation of an on-site water system." In addition, the DEIS states on page 6-21 that "The Petition Area does not have any existing power or communication facilities as it is currently an undeveloped property." (Emphasis added). Therefore, OHA urges that the reasons this land was designated as Conservation and put in a Limited subzone still apply as the applicant's own document illustrates.

Response: Please refer to the answers to Questions #9 and #12.

14. Furthermore, OHA understands that the master plan for this area actually calls for the expansion of conservation land in the project area. OHA also inquires as to how the Department of Planning and Permitting approved a sewer connection application in April of 2007 for a "20-lot subdivision (one dwelling per lot) and a comfort station for the cemetery expansion project" on lands that specifically do not permit these uses.

Response: We are unclear about your reference to a "master plan" in your question. We are not able to answer this question, and we invite you to inquire of the Department of Planning and Permitting about their policies of approving sewer connection applications.

15. Also, OHA notes that Kane'ohe Bay, which would receive waters discharged from this site via the He'eia fishpond, is designated as a class AA water body. Class AA waters have regulations against discharge to protect the waters in a natural pristine state with an absolute minimum pollution or alteration of water quality from any human source or action, according to the state Department of Health. OHA inquires as to the applicant's compliance with federal and state water quality regulations.

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention

areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HIMP; both for appearance and water quality issues, as well as offsite liability.

16. OHA further inquires as to the status of the water allocation for the proposed project from the Board of Water Supply. Because this area is a water management area (which also indicates that it should remain in Conservation), HAR §13-171-13 requires that the applicant shall establish that the proposed use of water can be accommodated with the available water source (which has not been done) and that it is consistent with state and county general plans and land use designations (which it is not) as well as county land use plans and policies (of which a significant amount are violated). The applicant must also establish that the water use is reasonable-beneficial, which is defined in HAR § 13-171-2 as being not wasteful and "is both reasonable and consistent with the state and county land use plans and the public interest."

Response: Since the 20-lot residential subdivision has been abandoned, no sources of domestic water supply will be required for the housing units. There will still be a need for irrigation water for approximately 30 acres of new cemetery. HIMP's first option for irrigation water is to develop on-site wells. Groundwater sources for these wells do not contribute to the Board of Water Supply's system. Approvals to allow the use of this water must come from CWRM, DLNR. If water cannot be developed on-site, the cemetery expansion will be allowed to use Board of Water Supply resources for irrigation. We have acknowledged in the EIS that further approvals are required at the County level, including a zoning amendment and Sustainable Communities Plan amendment.

17. OHA again states that the applicant's proposed use is not consistent with the subject property's current land use designation or in reasonable keeping land use plans. Certainly, putting houses in a Limited subzone is, at face value, also a risk to the public interest.

Response: Please refer to the answers provided to Questions #9 and #12 as well as several others above. We again would like to point out that the Petitioner has abandoned plans for the 20-lot residential subdivision.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
Office of Planning  
State Department of Health, Environmental Management Division, Clean Water Branch

Revision

July 19, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Park  
1330 Maunakea St.  
Honolulu, HI 96813

Re: Hawaiian Memorial Park Cemetery EIS

Dear Mr. Morford,

I am writing to you regarding Hawaiian Memorial Park Cemetery's plan to expand the cemetery along the slopes of Mt. Mahinui.

I have a number of concerns that I'd like to address. Some of these concerns were mentioned in the draft (albeit perhaps cursorily) and others were not.

One concern involves flooding. The EIS draft mentions studies done for a 10-year, one hour storm, with built-in "catchment ponds" on the property to deal with run-off. Is the parent company aware that Manoa Stream overflowed in 2004 and the extent of the devastation it caused not only to homes but to the University of Hawai'i at Manoa campus? Are they aware that the main library of the campus is still recovering from that flood? Are they aware of the 42-days/nights of, literally, constant rain that drenched all of O'ahu in March of 2006? Are they aware that a New Year's flood devastated the Hawai'i Kai area barely 10 years ago? Are they aware that hurricanes also threaten Hawai'i? Are they cognizant that forests - like the one currently draping Mt. Mahinui - are natural guards against flooding? What I would like to illustrate is that Hawai'i is green because it rains. A lot. And, obviously, one hour rain storms certainly happen in more than 10-year intervals. Have studies been done to investigate the consequences of what grading and paving and cutting down the forests of Mt. Mahinui would do when a 50-year flood hits? A 100-year flood?

Considering that the homes along Ohaha St, Ohaha Pl., Lipalu, Namoku St., Nakulu'ai St., etc. are *downtown* from Mt. Mahinui, has research been done to determine how a 10-year, one hour storm would affect homes *during* the 20-year construction? How will the run-off be handled without grass, forest or ponds to soak up the excess water? What about the possibility of mudslides into the homes as earth is dug up?

Speaking of run-off, the possibilities of polluting both Kawa Stream and Kane'ohu Bay are also of great concern. Kane'ohu Bay is already polluted and it's reefs in danger. There are steps being taken to reverse that pollution and bring the Bay back to healthy status. How does the cemetery propose to limit pesticide, herbicide and sewage pollution (via the restroom facilities in one of the mausoleums as well as the houses) into Kawa Stream and Kane'ohu Bay? Will the Cemetery help pay for conservation and clean-up

activities of the Stream and Bay? Will the Cemetery or the residents within the proposed housing development be responsible for keeping Kawa Stream cleared so that debris does not block the stream (as was the case with Manoa Stream in 2004)?

Ameron, for many years, has been blasting and mining the Kailua side of Mt. Mahinui for cement-building materials. It would seem wise, that perhaps geologic studies should be done to determine the impact on Mt. Mahinui herself should the Kane'ohu side of the mountain be developed in any way shape or form. Will this weaken the mountain and increase the possibilities of flooding and rockslides? Does developing the Kane'ohu side of Mt. Mahinui contain geologic or topographic dangers from the mountain itself unbeknownst to homeowners at this time?

Also, noted in the EIS draft is the mention that the proposed expansion is a 20-year project. Twenty years is an awfully long time to be living in a construction zone. Has research been done to investigate what the constant noise, worry, and stress of a 20-year construction project would do to the mental health of all the people in the neighborhoods to be affected by the construction?

Lastly, due to the decimation of the Hawaiian culture, it is imperative that every remaining site be preserved in full. It is of great concern that Kawa'ewa's resides on the property and that two more heiau have been uncovered, as well. Heiau are not simply rock walls, but are complexes built in specific areas for specific reasons. Heiau locations were chosen, in part, to sightlines to various mountain ranges, coasts, views of other islands, or perhaps in line with other heiau. By developing around Kawa'ewa's and the other heiau, aspects of the *meaning* of their specific locations would inherently be lost, thereby also erasing important cultural information. Construction around these sites may also inherently damage areas of the heiau, which may be unknown to belong to the heiau at this time. Have provisions been made for a long-term study of these sites by Hawaiian cultural experts? What provisions will be made if bones and other artifacts are unearthed at these sites?

Mahalo for your time regarding these questions and concerns.

Sincerely,

*PA*

Puanani Akaka  
PO Box 62125  
Honolulu, HI 96839

cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

October 8, 2008

Puanani Akaka  
P0 Box 62125  
Honolulu, HI 96839

Dear Ms. Akaka:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaii

Thank you for your letter dated July 19, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. One concern involves flooding. The EIS draft mentions studies done for a 10-year, one hour storm, with built-in "catchment ponds" on the property to deal with run-off. Are they aware that the main library of the campus is still recovering from that flood? Are they aware of the 42-days/nights of, literally, constant rain that drenched all of Oʻahu in March of 2007? Are they aware that hurricanes also threaten Hawaii? Are they cognizant that forests — like the one currently draping Mt. Mahinui — are natural guards against flooding? And, obviously, one hour rain storms certainly happen in more than 10-year intervals. Have studies been done to investigate the consequences of what grading and paving and cutting down the forests of Mt. Mahinui would do when a 50-year flood hits? A 100-year flood?

Response: The Petitioner is aware of the issues surrounding drainage and flooding in the Petition Area and surrounding neighborhoods. The Draft EIS thoroughly discusses the potential impacts and mitigation measures that will be implemented to ensure flooding does not increase because of the project.

There is a chance that 1-hour storm events happen more often than 10-year intervals. By definition, the 10-year 1-hour storm has a probability of occurrence of 10% in any given year.

Ms. Puanani Akaka  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

2. Considering that the homes along Ohaha St, Ohaha Pl., Lipalu, Namoku St., Nakuluʻai St., etc. are downhill from Mt. Mahinui, has research been done to determine how a 10-year, one hour storm would affect homes during the 20-year construction? How will the run-off be handled without grass, forest or ponds to soak up the excess water? What about the possibility of mudslides into the homes as earth is dug up?

Response: Like many letters we received concerning the construction period for the cemetery expansion, there is considerable confusion about the time periods involved for actual construction. The expansion of the cemetery will now occur in three phases that are ±5 years apart that will each last six months. Construction will not last for 20 years.

As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels.

Retention areas are proposed as the preferred method to control storm water runoff. The retention areas hold storm water and will allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules (DPP) relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

3. Speaking of run-off, the possibilities of polluting both Kawa Stream and Kaneʻohe Bay are also of great concern. Kaneʻohe Bay is already polluted and it's reefs in danger. There are steps being taken to reverse that pollution and bring the Bay back to healthy status. How does the cemetery propose to limit pesticide, herbicide and sewage pollution (via the restroom facilities in one of the mausoleums as well as the houses) into Kawa Stream and Kaneʻohe Bay? Will the Cemetery help pay for conservation and clean-up activities of the Stream and Bay?

Response: The method of retention areas for storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus(TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. Because no additional runoff will enter Kāwā Stream, this equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system.

The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kane'ohē Bay. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability. HMP will also participate in a water quality monitoring program that measures stream flow and pollutants in Kāwā Stream. In terms of wastewater, we want to let you know that HMP has modified the development program for the project by eliminating the 20-hot residential subdivision and the Lipalu Street extension. Consequently, no wastewater will be generated by the new housing units. The only wastewater attributable to the project will come from one restroom in one mausoleum. City facilities are adequate to handle this modest increase in demand.

4. Will the Cemetery or the residents within the proposed housing development be responsible for keeping Kawa Stream cleared so that debris does not block the stream (as was the case with Manoa Stream in 2004)?

Response: Every landowner is responsible for the portion of the stream that crosses their property. HMP does not anticipate large piles of debris piling up on its property, and will practice responsible maintenance on its property. As mentioned, no new housing units will now be constructed as part of the project.

5. Ameron, for many years, has been blasting and mining the Kailua side of Mt. Mahinui for cement-building materials. It would seem wise, that perhaps geologic studies should be done to determine the impact on Mt. Mahinui herself should the Kane'ohē side of the mountain be developed in any way shape or form. Will this weaken the mountain and increase the possibilities of flooding and rocksides? Does developing the Kane'ohē side of Mt. Mahinui contain geologic

or topographic dangers from the mountain itself unbeknownst to homeowners at this time?

Response: There are no known dangers related to mining for the Kane'ohē side of the mountain. Topographic dangers for the Petition Area were studied as part of the slope stability and rockfall hazard study performed for the project. As discussed in Section 4.6 of the Draft EIS, the slope stability analysis determined that there is no apparent potential for hazards to the Petition Area that may be associated with slope stability. There is a potential for hazards associated with rockfall in limited areas. These hazards can be mitigated using available technology. Mitigative measures for rockfall hazards may include one or a combination of the following: 1) securing existing boulders using netting or chaining; 2) removal of the boulders; 3) installation of fencing uphill from proposed improvements; and 4) constructing a buffer zone between the rockfall hazard source and the proposed improvement. The choice of mitigative measure will depend on the specific site conditions.

6. Also, noted in the EIS draft is the mention that the proposed expansion is a 20-year project. Twenty years is an awfully long time to be living in a construction zone. Has research been done to investigate what the constant noise, worry, and stress of a 20-year construction project would do to the mental health of all the neighborhoods to be affected by the construction?

Response: Please refer to the response to Question #2, concerning phasing.

A noise review for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS and summarized in the following paragraphs. Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic features provide additional natural barriers to further absorb and screen possible noise emissions.

7. Lastly, due to the decimation of the Hawaiian culture, it is imperative that every remaining site be preserved in full. It is of great concern that Kawa'ewa'e resides on the property and that two more heiau have been uncovered, as well. Heiau are not simply rock walls, but are complexes built in specific areas for specific reasons. Heiau locations were chosen, in part, to sightlines to various mountain ranges, coasts, views of other islands, or perhaps in line with other heiau. By developing around Kawa'ewa'e and the other heiau, aspects of the meaning of their specific locations would inherently be lost, thereby also erasing important cultural information. Construction around these sites may also inherently damage areas of the heiau, which may be unknown to belong to the heiau, at this time. Have provisions been made for a long-term study of these sites by Hawaiian cultural experts? What provisions will be made if bones and other artifacts are unearthed at these sites?

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, HMP has modified the program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. The preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites. It will remain almost entirely in its current natural state, except for a modest access road.

Those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work

will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any inadvertent cultural or archaeological finds take place.

Cultural monitoring will be conducted during all phases of development activities. A cultural and archaeological monitor will observe all grading and excavation activities to provide verification that cultural and archaeological finds have been protected.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 19, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Park  
1330 Maunakea St.  
Honolulu, Hawaii 96813

Re: Hawaiian Memorial Park Cemetery

Dear Mr. Morford,

We have concerns about the Hawaiian Memorial plan on several levels.

Our property at 45-442 Ōhāhā St. abuts the cemetery. We are original owners whose property has been seriously affected on several occasions by severe flooding and mudslides emanating from Hawaiian Memorial Park. Our primary concern stems from the instability which will be caused by the re-grading planned in and around the properties which also abut the cemetery. To believe that there would be no impact is naive at best and criminal at worst.

Your current EIS discusses flooding from the standpoint of a 10 year, 1 hour storm. While the severity varies, I would like to point out that a number of severe storms with very heavy rain since 1965 have been much longer than one hour and have generally caused some degree of flooding.

A related concern is how this project will impact on Kawa Stream and, subsequently, Kane'ōhe Bay. Increased runoff and drainage will clearly have an effect increasing the already polluted state of both. Given the use of pesticides, fertilizers, and the like certainly won't lessen the pollution problem.

We have noticed no discussion of impact of the wind in heavy windstorms, alluded to in the attached previous correspondence. Has that issue been studied at all? We see no reference to it in the EIS.

As noted, there is a heiau on the property which is a sacred area to Hawaiians and others who subscribe to Hawaiian values and practices. Heiau are traditionally looked upon as complexes which encompass more than just a burial area. I feel it is critical to avoid disturbing an ancient and sacred site. It is likely as construction and digging begin that ancient bones and archeological treasures will be disturbed which will be very unsettling to the native Hawaiian population in the area.

Perhaps of unimportance to the corporation making these plans, the scenic beauty of the area is of great importance to those of us who live here. It is one of the many reasons

we chose to live in this area and to raise our families here. We don't care to be looking at huge mausoleums instead of the beauty that we are looking at right now.

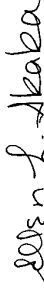
If you have any questions, please feel free to contact us.

I have attached correspondence in relation to previous discussions of similar projects.

Sincerely,



William H. Akaka



Ellen L. Akaka

45-442 Ōhāhā St.  
Kane'ōhe, Hawaii 96744

Attachments

cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawai'i  
Helber, Hastert and Fee, Planners



45-442 Ohaha Street  
Kaneohe, Hawaii 96744  
December 7, 1983

Chair  
Kaneohe Neighborhood Board No. 30  
c/o Kaneohe Satellite City Hall  
46-024 Kamehameha Highway  
Kaneohe, Hawaii 96744

Dear Mrs. Clingan,

In view of the recent decision of the City Planning Commission to recommend the development of 26.6 acres adjacent to Pikoiloa for housing, I feel compelled to resubmit my letter of August 8, 1983.

Aside from the many concerns previously discussed such as potential flooding and soil erosion problems and the potential of archeological significance due to heiaus in the area, there is one problem which has not previously been discussed and which, I believe, merits study before any changes are made in the general plan. Living in topmost area of the subdivision for many years has made me aware of the problems which can be caused by the wind coming off the the hill in even non-storm situations. The most obvious damage is caused during severe storms such as the one in early 1981 and, of course, last year's hurricane. But there have been other high wind situations which have caused minor damage to fences and equipment stored on lanais and in garages. In times of heavy wind, the wind coming off the hill sometimes acts as a mini-tornado and swirls around the houses picking up fence boards, aluminum patio roofs, garbage cans and the like and carrying them far enough to cause damage to other structures. My concern is that if houses are constructed on the ridge above the subdivision, fences, roofs, etc. could be blown down on the houses below causing severe damage.

I would like to request that, if an amendment to the general plan is going to be seriously considered to allow construction of homes, some type of wind study be done during times of both conventional trades and also heavy winds to assure the safety of the residents living in the areas below the proposed construction. As a long-time home-owner in this area, I appreciate the need for new homes in Kaneohe but I feel that the safety and welfare of the area's long-time residents should not be compromised.

Mr. Houghtaling, in his letter, points out that the area in question is under 20% slope; however, the area immediately adjacent is considerably over 20% slope. Should that point not be considered in the final decision?

Sincerely,

*Ellen L. Akaka*

(Mrs.) Ellen L. Akaka

cc: Leigh-Wai Doo  
Willard T. Chow  
Pikoiloa Community Association



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

William and Ellen L. Akaka  
45-422 Ohaha St.  
Kāne'ohe, HI 96744

Dear Mr. and Mrs. Akaka:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 19, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Our property at 45-442 Ohaha St. abuts the cemetery. We are original owners whose property has been seriously affected on several occasions by severe flooding and mudslides emanating from Hawaiian Memorial Park. Our primary concern stems from the instability which will be caused by the re-grading planned in and around the properties which also abut the cemetery.

Response: First, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events.

As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. Permanent erosion

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

45-442 Ohaha Street  
Kaneohe, Hawaii 96744  
August 30, 1982

Ed Tsukasa  
Development Plan Chairman  
Kaneohe Neighborhood Board  
Kaneohe, Hawaii 96744

Dear Mr. Tsukasa,

My husband and I are original owners of a home in the Pikoiloa subdivision, and we are deeply concerned about a proposal by Castle Estate (82/KP-21(M)) to amend 22 acres from agricultural to residential use.

The upper level of this subdivision has a history of serious land slippage during heavy storms. A number of times during the period from 1965 to 1970 our lot received an onslaught of from 3 to 6 inches of silt from the slope behind our home. The easements leading to a large storm drain at one level of our property were unable to handle the force of the water and we had to deal with a virtual waterfall. The City and County made some changes in the easements and the storm drain, but the problem of the mud coming off the hill was not solved. We have put up a wall and have also allowed grass, weeds, etc. to grow freely hoping that this would solve the problem. Our concern, at this point, is that if construction is begun on the top of that ridge, any maneuvering of that unstable soil will cause massive problems for those who live below. There were many homes that were similarly affected, not only ours.

Also, during the period of construction (in 1964) 4 homes on Makualui Street, less than a block away, in varying degrees of development, were partially or completely destroyed by severe earthslides during the rainy season and had to be rebuilt.

In addition, we are wondering whether the Board is aware that there is reported to be a heiau in the vicinity. We do not know its exact location but there are several Hawaiian families in the subdivision who should have a general idea. We feel that this is extremely important and should be investigated before any further construction takes place in this area.

If there are any questions, please feel free to contact me (247-1296, evenings) or my husband (948-6986, days).

Sincerely,

(Mrs.) Ellen L. Akaka

cc: Tim Chow  
Andrew Poepoe

control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion.

2. Your current EIS discusses flooding from the standpoint of a 10 year, 1 hour storm. While the severity varies, I would like to point out that a number of severe storms with very heavy rain since 1965 have been much longer than one hour and have generally caused some degree of flooding. Response: It is important to note that the 10-year 1-hour storm event is the design parameter required by the City and County of Honolulu. Storm water systems are then designed to meet this volume of stormwater flow. This is a universal county standard. Storms that exceed this volume of storm water do happen. When they do, flooding conditions can occur.

3. A related concern is how this project will impact on Kawa Stream and, subsequently, Kane'ohu Bay. Increased runoff and drainage will clearly have an effect increasing the already polluted state of both. Given the use of pesticides, fertilizers, and the like certainly won't lessen the pollution problem.

Response: Retention areas are proposed as the preferred method to control runoff. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. In fact, with the implementation of the system of retention areas, pollutant loads are projected to decrease by approximately 27.5% for TSS, 17.5% for TN, and 17% for TP. The proposed project is helping to improve the water quality of Kāwā Stream and ultimately Kane'ohu Bay (see Section 6.4 of the EIS for a more detailed discussion). No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues, as well as offsite liability.

4. We have noticed no discussion of impact of the wind in heavy windstorms, alluded to in the attached previous correspondence. Has that issue been studied at all? We see no reference to it in the EIS.

Response: The interface between the proposed project and existing residences will be tempered by the retention of a generous vegetative buffer of at least 50 feet. This will provide a wind break and shade as well as a visual buffer for HMP neighbors.

5. As noted, there is a heiau on the property which is a sacred area to Hawaiians and others who subscribe to Hawaiian values and practices. Heiau are traditionally looked upon as complexes which encompass more than just a burial area. I feel it is critical to avoid disturbing an ancient and sacred site. It is likely as construction and digging begin that ancient bones and archeological treasures will be disturbed which will be very unsettling to the native Hawaiian population in the area.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. The project has been modified to include a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also protect significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

6. Perhaps of unimportance to the corporation making these plans, the scenic beauty of the area is of great importance to those of us who live here. It is one of the many reasons we chose to live in this area and to raise our families here. We don't care to be looking at huge mausoleums instead of the beauty that we are looking at right now.

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of one of the alternatives discussed in the EIS, the "Cemetery Only Alternative." After careful consideration, this alternative has been selected as the development to be considered by the State Land Use Commission. This alternative eliminates the 20-lot residential subdivision from the development program.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Where the roofs of the mausoleums are visible from areas further away, they are a minor element of the viewshed. Additional landscape treatment for the mausoleums will be provided, as well as appropriate exterior and roof colors.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 20, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

I have reviewed the draft EIS for the Hawaiian Memorial Park Cemetery Expansion and these are my concerns and questions:

1. The tax map that is pictured on page 4-15 does not indicate our names as the owners of our lot (Gary L. Gray and Kathleen A. O'Malley). In fact, the owners cited were the owners previous to the people we bought the property from. Is this typical to use an out of date tax map in such a study?
2. Kawa Stream is on the Clean Water Act's list of impaired streams. The TMDL Implementation Plan published by the Hawaii Department of Health in October 2002 proposed 5 major strategies to guide solutions to help improve the status of the stream and stated: "Considering that land use in the watershed is developed to nearly the maximum extent allowed by current zoning, we emphasize pollution prevention in existing households and commercial and public facilities; environmental maintenance, especially erosion control, within and along stream channels; stormwater management in urban drainage systems; and watershed education and stewardship." How can you rationalize adding any more stress to our watershed when six years ago it was described to be at its "maximum extent? What kind of stewardship is that?"
3. In the fauna section of the DEIS, it is stated that: "Although this species was not recorded during the present survey it is possible that pueo could occasionally forage in the area." My family has lived on Ohaha Street for almost 23 years and I have personally sighted pueo on at least 10 occasions during that time with at least 1 sighting during the last year. Additionally, my son has also observed the pueo flying above the forest behind our house on at least 3 separate occasions. What will happen to the pueo when their forest is taken away and replaced with grass? The pueo is already listed as an endangered species. They nest on the ground and their eggs and young are especially susceptible to predation by animals as well as bulldozers. Please do not take away one of their remaining habitats.

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

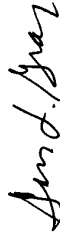
Gary L. Gray  
45-426 Ohaha Street  
Kāne'ohe, HI 96744

Dear Mr. Gray:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

I await your responses.

Sincerely,



Gary L. Gray  
45-426 Ohaha Street  
Kaneohe, HI 96744

cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

4. The cemetery grounds will now extend to right behind our property with an interior cemetery roadway that comes very close to our backyard. Our neighborhood has had numerous thefts and problems with intruders over the years. We personally have been robbed at least 4 times. Your expansion plan will now make our properties even more accessible to criminals. Will HMP be hiring additional security to protect us? How will this issue be addressed? This is a very serious concern.
5. When we bought our home against the hillside 23 years ago, we believed that conservation land meant conservation land forever. Kaneohe, as a community, has been committed to preserving our natural environment. We have tried to be good stewards of the land. What will HMP's legacy be?

Thank you for your letter dated July 20, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The tax map that is pictured on page 4-15 does not indicate our names as the owners of our lot (Gary L. Gray and Kathleen A. O'Malley). In fact, the owners cited were the owners previous to the people we bought the property from. Is this typical to use an out of date tax map in such a study?  
Response: We obtain Tax Maps from an authorized Tax Map Key service, a service which is utilized throughout Honolulu. The key information related to Tax Maps is the existing lot configurations. If property ownership is important, we access the Real Property Division Data Base.
2. Kawa Stream is on the Clean Water Act's list of impaired streams. The TMDL Implementation Plan published by the Hawaii Department of Health in October 2002 proposed 5 major strategies to guide solutions to help improve the status of the stream and stated: "Considering that land use in the watershed is developed to nearly the maximum extent allowed by current zoning, we emphasize pollution prevention in existing households and commercial and public facilities; environmental maintenance, especially erosion control, within and along stream channels; stormwater management in urban drainage systems; and watershed education and stewardship." How can you rationalize adding any more stress to our watershed when six years ago it was described to be at its "maximum

extent?

Response: Retention areas are proposed as the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen(TN), Phosphorus(TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. We recently completed an analysis of the project as it related to the Department of Health's recommendations regarding a desire to decrease Total Maximum Daily Load Allocations (TMDL) for the Kāwā Stream watershed. The study showed the TMDL allocations originating from the project site will decrease because no additional runoff will enter Kāwā Stream. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than Hawaiian Memorial Park (HMP); both for appearance and water quality issues.

3.

The DEIS, says "Although this species was not recorded during the present survey it is possible that pueo could occasionally forage in the area." My family has lived on Ohaha Street for almost 23 years and I have personally sighted pueo on at least 10 occasions during that time with at least 1 sighting during the last year. Additionally, my son has also observed the pueo flying above the forest behind our house on at least 3 separate occasions. What will happen to the pueo when their forest is taken away and replaced with grass? The pueo is already listed as an endangered species.

Response: According to the study prepared by our avifaunal expert for the EIS (Philip Bruner), there is not expected to be an adverse impact to any avifauna species due to the Proposed Action. As noted in the EIS, the short-eared Owl or *Pueo* (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible *Pueo* could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species

including the *Pueo*. In addition, there is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few *Pueo* that still exist on O'ahu would require.

We would also like to point out that HMP will be modifying the development program by creating a 9.4-acre cultural preserve east of Kawa'ewa'e Heiau that encompasses five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. The 9.4-acre area will remain intact and in its current "natural" state except for a modest access road.

4. The cemetery grounds will now extend to right behind our property with an interior cemetery roadway that comes very close to our backyard. Our neighborhood has had numerous thefts and problems with intruders over the years. We personally have been robbed at least 4 times. Your expansion plan will now make our properties even more accessible to criminals. Will HMP be hiring additional security to protect us? How will this issue be addressed?

Response: According to Honolulu Police Department Community Affairs Division, there is no correlation to an increase in crime and new developments or roads. Overall, crime has been decreasing in the last 10 years throughout O'ahu.

HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

5. When we bought our home against the hillside 23 years ago, we believed that conservation land meant conservation land forever.

Response: Property owners always have the right to seek alternative uses of their property as long as they follow all pertinent land use regulations. Hawai'i Administrative Rules Title 15 Chapter 15, Land Use Commission Rules, lays out the requirements for how to petition the Land Use Commission for a boundary amendment. The use of land is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community

Mr. Gary Gray  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 4

requirements. Often times there are requirements that must be balanced against each other.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 20, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

No. Please don't develop these mountains. I love these mountains. They are beautiful and sacred to me. They bring peace to my life. I feel sick to my stomach when I think of losing my mountains. A'ole. No. This is not right. We are meant to cherish these mountains. These mountains are so beautiful in the morning time or when they are covered in clouds during a rain. I am connected to these mountains. I love them with all my heart. Please do not develop these mountains. This land is conservation land. This land is for you and for me and for the birds and the trees and for the spirit of the earth. This land is for hiking and for exploring and loving the earth. This land is not yours to destroy. We as a people need beautiful places like this for our sanity. We must protect this special place.

One of the main reasons why I oppose this project is because these mountains are home to the pueo, the Hawaiian owl. I have seen the pueo flying several times through its home in the forests of the mahiui hillside. If you cut down the trees and expand your cemetery you'll be destroying the pueo's habitat. "The pueo nest on the ground, which make their eggs and young susceptible to predation by the introduced mongoose and other hunters, as well as by bulldozers. Pueo inhabit forests and grasslands throughout the islands of Hawaii, although their numbers are declining rapidly, particularly in the last two decades, and especially on the island of o'ahu, upon which they were at one time very prevalent. Pueo are now listed as an endangered species. Pueo are strongly affected by light pollution. They are often killed in vehicular accidents in which they dive toward the headlights of cars, possibly in an attempt to hunt."(wikipedia.org/wiki/pueo) The pueo is an aumakua, or family guardian spirit to many Hawaiian families. The pueo is a beautiful and majestic bird that I believe should be allowed to continue to live in its home in the mahiui hillside.

I am also concerned that clearing the forest of it's shade giving trees would make this hillside so much hotter.

These hills have many archeological sites that should be preserved as a "cultural complex."

Please don't develop these mountains. This is my backyard.

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Liam Gray  
45-426 Ohaha Street  
Kāne'ohe, HI 96744



Sincerely,

*Liam Gray*

Liam Gray  
45-426 Ohaha Street  
Kaneohe, HI 96744

cc: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners

Dear Mr. Gray:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**

Thank you for your letter dated July 20, 2008 providing comments on the Draft Environmental Impact Statement (EIS) above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Please don't develop these mountains. This land is conservation land.  
  
Response: We note your opposition to the Proposed Action. The use of land, even conservation land, is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. We would like to let you know that the residential portion of the Proposed Action will not be built, as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative. The expansion of cemetery lands will be a much less intensive development of the area.
2. One of the main reasons why I oppose this project is because these mountains are home to the pueo, the Hawaiian owl. I have seen the pueo flying several times through its home in the forests of the mahinui hillside. If you cut down the trees and expand your cemetery you'll be destroying the pueo's habitat.  
  
Response: As noted in the EIS, Section 4.8, the short-eared Owl or Pūeo (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. However, the EIS notes that it is possible Pūeo could occasionally forage in the area as it forages in



grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation of the 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the *O'ahu 'Amakihi*, and *Pueo*. In addition, Hawaiian Memorial Park (HMP) has modified the development program by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This cultural preserve will also include significant areas where the lau'e fern is found, to provide future supply for those who gather this plant.

3. I am also concerned that clearing the forest of its shade giving trees would make this hillside so much hotter.

Response: The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in hundreds of new trees, which should create a better landscape appearance for the expansion area.

The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed HMP expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.

Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can

be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

4. These hills have many archeological sites that should be preserved as a "cultural complex."

Response: Please refer to #2 above.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

DD ✓  
B5

Martin and Sharron McMorrow  
45-115 Moakaka Pl.  
Kaneohe, HI 96744  
July 20, 2008

LAND USE COMMISSION  
STATE OF HAWAII

2008 JUL 23 P 12:19

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

We are anxious that the LUC would allow conservation land to turn into urban use on this site at HMP. Once the land is no longer conservation land it is lost forever by the public who treasures the beauty of our aina. Not to mention disturbing historical sites.

Let's preserve the precious beauty and tranquility of our windward side. So few places in the country are as fortunate as we here in Kaneohe to have such beautiful mountains and flora. We would hate to see it all lost so a developer can make some more money.

Sincerely,

Martin and Sharron McMorrow

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert & Fee, Planners

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Martin and Sharron McMorrow  
45-115 Moakaka Pl.  
Kāne'ohe, HI 96744

Dear Mr. and Mrs. McMorrow:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 20, 2008 providing comments on the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We are anxious that the LUC would allow conservation land to turn into urban use. Once the land is no longer conservation land it is lost forever by the public who treasures the beauty of our aina.

Response: Your opposition to the Proposed Action is noted. The use of land is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. We believe that Hawaiian Memorial Park (HMP) fills a very necessary need in the community. We would like to point out that HMP has modified the development program for the project in two significant ways. First, the 20-lot residential subdivision and the Lipalu Street extension have been eliminated from the project to be replaced by cemetery use. Second, a 9.4-acre cultural preserve will be created east of Kawa'ewa'e Heiau that includes five archaeological sites and large areas of laua'e fern that can be used for gathering by hula practitioners and others. Another 11.4 acres will be revegetated with native and indigenous plants. In total, the Petition Area will have only 4.8 acres (8.5%) of the total 56.5 acres of the project as impervious surfaces. The balance will be in open space.



2. Worried about disturbing historical sites.

Response: As noted in the Draft Environmental Impact Statement (EIS), the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites. As discussed above, the preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites. A cultural resource preservation plan will be prepared by the landowner and approved by the Department of Land and Natural Resources prior to any ground disturbing activities.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 21, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Park  
1330 Maunakea St  
Honolulu, HI 96744

RE: Hawaiian Memorial Park Expansion LUC Docket # A07-777

I have the following comments and questions:

1. I disagree with the conclusion in the Draft EIS that there will not be significant negative impacts on the views in the surrounding neighborhood, Kaneohe Bay, and other areas of Kaneohe. The visual profiles in Figure 24, section 4-45 do not account for many other possibilities that exist. Scott Ezer told me that the starting point, or height of eye, used in profile 1 and 2 is 6 ft. Much more of the petition area would be visible from a height of eye of 8 feet, as in the case of riding in a city bus. Even worse would be a height of eye of 18 feet, as in the view from the second story of a house. Please show the impacts from these additional heights of eye.

Moving farther away from the vegetation buffer would allow more of the proposed development to be visible. Please show a view from Coconut Island in Kaneohe Bay and from the H-3 freeway from the elevated section above Windward Community College.

2. At the community meeting in July 23, 2007 the question was asked of what the impacts on the view would be from Pohai Nani. Why was that question not addressed in the Draft EIS?

3. I disagree with the premise that there is a Market need for cemetery expansion on Oahu. The population of Oahu quickly is being educated about the need to recycle aluminum, paper, plastic, and green waste, to conserve water, electricity, and gasoline. People young and old are embracing the concept of sustainability. The proposed expansion of Hawaiian Memorial Park is very unpopular with the residents of Pohai Nani, who are the older generation. The baby boomer generation will be easily persuaded to adopt cremation or other methods of dealing with their loved ones.

Using this conservation land for a cemetery is an extremely poor use of the land. Casketed burial is an outdated practice on an island as populated as Oahu. If no more cemeteries are developed, the population will by necessity change their behavior. I urge the LUC and other government agencies to reject the expansion of Hawaiian Memorial Park to be consistent with the Ko' olaupoko

Sustainable Communities Plan. I think that the primary reason that Service Corporation International (SCI) wants to develop this property is to make money. The location will offer great views and SCI can sell their product for top dollar. The elevation that provides the great views will also cause the development to be an eyesore for miles around. The profit motive is the impetus behind this proposed development, not a need of the community.

Sincerely,



Rich McCreedy  
45-423 Ohaha St  
Kaneohe HI 96744

Helber Hastert & Fee  
*Planners, Inc.*

October 8, 2008

Rich McCreedy  
45-423 Ohaha St  
Kāne'ohe, HI 96744

Dear Mr. McCreedy:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 21, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I disagree with the conclusion in the Draft EIS that there will not be significant negative impacts on the views in the surrounding neighborhood, Kaneohe Bay, and other areas of Kaneohe. The visual profiles in Figure 24, section 4-45 do not account for many other possibilities that exist. Scott Ezer told me that the starting point, or height of eye, used in profile 1 and 2 is 6 ft. Much more of the petition area would be visible from a height of eye of 8 feet, as in the case of riding in a city bus. Even worse would be a height of eye of 18 feet, as in the view from the second story of a house. Please show the impacts from these additional heights of eye.

Moving farther away from the vegetation buffer would allow more of the proposed development to be visible. Please show a view from Coconut Island in Kaneohe Bay and from the H-3 freeway from the elevated section above Windward Community College.

Response: We acknowledge your disagreement with our visual analysis. Perception of visual impacts is a very personal and subjective experience. Two people can view the same landscape and have very different viewing experiences. Hawaiian Memorial Park (HMP) has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS, including from the H-3 freeway, and long-range views on the north side of Kāne'ohe.



We would like you to know that HMP has modified the project development program in two important areas: (1) the 20-lot residential subdivision and the Lipalu Street extension to service these lots have been abandoned, and will be replaced by cemetery use; (2) a 9.4-acre cultural preserve will be created east of Kawā'ewa'e Heiau that includes five archaeological sites and large areas where the lau'e fern is plentiful.

The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve will retain the same look as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees. This character is represented by Figure 22b, which demonstrates an oblique aerial view of the Petition Area, as seen from the northwest to the southeast, at an elevation of about 1,000 ft, which is a view that is not visible to the public.

Figure 23f depicts a before and after image as seen from Makamae Street at Lilipuna Road looking southeast. This viewpoint is approximately 1.9 miles from the Petition Area. The viewplane towards the Petition Area is predominantly made up of residential housing in the foreground, with the green of the Oneawa Hills and Ko'olau Mountain Range still the principle background view. The proposed cemetery expansion area is slightly visible, but overall the viewplane is still characterized by a green backdrop to the hills. The roofs of the mausoleums are visible, but are a minor element of the viewshed.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer.

Figures 24, 28a, and 28b of the Draft EIS are still relevant to demonstrate the typical profiles of how the elevation difference and landscaped buffer will shield the Petition Area from view in the adjacent residential neighborhoods. We have taken great effort to accurately portray the visual impacts associated with the proposed project. We cannot analyze every possible viewing point, especially those not considered public views.

2. At the community meeting in July 23, 2007 the question was asked of what

the impacts on the view would be from Pohai Nani. Why was that question not addressed in the Draft EIS?

**Response:** The view from Pohai Nani is not a public view, and while the project will change the view from Pohai Nani, the view will still be predominately an open space one. The proposed project will include revegetation with appropriate native and indigenous species. Some Polynesian-introduced plants may be used as well. Spreading foliage trees along the bottom reaches of the transition slopes and buffer areas adjacent to the residential uses will keep the sense of open space and lush vegetation. In addition, landscaping for the cemetery expansion will result in over 300 new trees, which should create a better landscape appearance for the expansion area. Taken in conjunction with the changes to the project described above, when the project is at full build-out, 51.7 acres (91.5%) of the 56.5-acre Petition Area will remain in open space.

2. I disagree with the premise that there is a Market need for cemetery expansion on Oahu. The proposed expansion of Hawaiian Memorial Park is very unpopular with the residents of Pohai Nani, who are the older generation. The baby boomer generation will be easily persuaded to adopt cremation or other methods of dealing with their loved ones.

**Response:** We note your disagreement with the market need provided in the EIS. However, since you are not a market analyst, nor do you have any experience in the cemetery business, we trust that we have an accurate appreciation of future demand for burial space. The EIS documents the rise in preference for cremation over casketed burials during the last 20 years. However, the change in preference seems to have leveled off recently. Even with a majority of preference for cremation, the number of burials will continue to increase as the population ages, with ever-increasing numbers in older age cohorts.

If the support or lack thereof of Pohai Nani residents can be taken from the letters received regarding the Proposed Action, the majority of the residents expressed opposition to the project due to impacts on their views, not based upon preference of cremation over burials.

3. Using this conservation land for a cemetery is an extremely poor use of the land.

**Response:** Land use is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. The use of the Petition Area as

Mr. Rich McCreedy  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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UNCLASIFIED  
DATE: 07-21-2008

cemetery land means this use won't have to compete with land more suitable to non open space uses (housing, commercial, industrial) in other places.

4. Casketed burial is an outdated practice on an island as populated as Oahu. If no more cemeteries are developed, the population will by necessity change their behavior.

Response: The EIS documents the rise in preference for cremation over casketed burials during the last 20 years. There may indeed continue to be a slow transformation towards more land-efficient interment options like cremation, but the desire for casketed ground burial is a decision based on family tradition and heritage, and religious and cultural beliefs, and demand will remain strong for the foreseeable future.

5. I urge the LUC and other government agencies to reject the expansion of Hawaiian Memorial Park to be consistent with the Ko'olaupoko Sustainable Communities Plan.

Response: We note your opposition to the Proposed Action. The EIS notes that a change will need to be made to the Sustainable Communities Plan as it is not currently consistent with the language. As part of the entitlement process, the Petitioner will need to apply for an amendment.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,  
HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



STATE OF HAWAII  
DEPARTMENT OF HEALTH  
OFFICE OF ENVIRONMENTAL QUALITY CONTROL  
HONOLULU, HAWAII 96813

July 21, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

**SUBJECT:** Draft Environmental Impact Statement (DEIS) for Hawaiian Memorial Park Cemetery Expansion, Kaneohe, Oahu, Hawaii  
TWK: (1) 4-5-033: 001 (portion)

Thank you for allowing us to review and comment on the subject application. The document was routed to the various branches of the Department of Health (DOH) Environmental Health Administration. We have the following Clean Water Branch, Safe Drinking Water Branch, Total Maximum Daily Load Program, and General comments.

Clean Water Branch

The Department of Health, Clean Water Branch (CWB), has reviewed the subject document and offers these comments on your project. Please note that our review is based solely on the information provided in the subject document and its compliance with Hawaii Administrative Rules (HAR), Chapters 11-54 and 11-55. You may be responsible for fulfilling additional requirements related to our program. We recommend that you also read our standard comments on our website at <http://www.hawaii.gov/health/environmental/ery-planning/landuse/CWB-standardcomment.pdf>.

1. Any project and its potential impacts to State waters must meet the following criteria:
  - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
  - b. Designated uses (HAR, Section 11-54-3), as determined by the classification of the receiving State waters.
  - c. Water quality criteria (HAR, Sections 11-54-4 through 11-54-8).

Mr. Morford  
July 21, 2008  
Page 2

2. As identified in the DEIS, Kawa Stream has been categorized as an impaired water body under Section 303(d) of the Clean Water Act. Consequently, a decision on Allocations of Total Maximum Daily Loads of Total Suspended Solids, Nitrogen and Phosphorus for Kawa Stream, dated June 2005, was proposed to the U.S. EPA, and the EPA approved the proposed decision in September 2005. This allocation decision identified the existing cemeteries as a nonpoint source priority area for the reduction of nitrogen and sediment loadings. Accordingly, the subject DEIS for the proposed cemetery expansion should address load reduction practice/measures that will be applied toward achieving compliance with the applicable water quality parameters and nonpoint source load allocations for Kawa Stream.

3. You are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR, Chapter 11-55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

- a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbances of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
- b. Hydrotreating water.
- c. Construction dewatering effluent.
- d. Well drilling activities.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities. The NOI forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/geni-index.html>.

4. For types of wastewater not listed in Item No. 3 above or wastewater discharging into Class 1 or Class AA waters, you may need an NPDES individual permit. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the discharge. The NPDES application forms may be picked up at our office or downloaded from our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/forms/indiv-index.html>.

Mr. Morford  
July 21, 2008  
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5. You must also submit a copy of the NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. Please submit a copy of your request for review by SHPD or SHPD's determination letter for the project along with your NOI or NPDES permit application, as applicable.

6. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage is required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

If you have any questions, please visit our website at <http://www.hawaii.gov/health/environmental/water/cleanwater/index.html>, or contact the Engineering Section, CWB, at 586-4309.

Safe Drinking Water Branch (SDWB)

The Hawaiian Memorial Park Cemetery expansion includes a 20-lot residential subdivision. The Board of Water Supply (BWS), County of Honolulu, notified Hawaiian Memorial Park that water service cannot be made available for the proposed residential subdivision because the parcels are above the elevation limit for the windward BWS water system serving the area.

The Draft Environment Impact Statement states that the Hawaiian Memorial Park will create an on-site water system with a new well and storage facility to supply the drinking water for the proposed 20-lot subdivision and a cemetery comfort station, and as such, will be a regulated public water system under DOH rules, HAR 11-20. The Hawaiian Memorial Park is required to obtain the DOH approval to use the water from the new well for drinking water purposes. An Engineering Report prepared by a licensed professional engineer, which includes the analytical test results of the testing for Federal and State regulated contaminants in drinking water, is required.

The Safe Drinking Water Act as amended in 1996, also requires all new public water systems which serves at least fifteen service connections used by year-round residents or regularly serves at least twenty-five year-round residents, to demonstrate adequate technical, managerial, and financial capacity before approval to begin water system operations can be granted.

The DOH's SDWB is the primary agency in Hawaii for implementation of the Safe Drinking Water Act regulations. The drinking water regulations are promulgated in the Hawaii Administrative Rules, Title 11, Chapter 20 titled "Rules Relating to Potable Water Systems." Additional information on the submittal of the Engineering Report and information on technical,

Mr. Morford  
July 21, 2008  
Page 4

managerial and financial capacity for new public water systems, are available at the SDWB website at 919 Ala Moana Boulevard, Honolulu, Hawaii 96814, or by calling (808) 586-4258.

Information on the Engineering Report submittal is also available at the SDWB website at [http://hawaii.gov/health/ehi/imp/imp/total\\_water\\_sdwb\\_index.html](http://hawaii.gov/health/ehi/imp/imp/total_water_sdwb_index.html).

#### Total Maximum Daily Load (TMDL) Program

Although the DOH apparently did not respond to the EISPN, in early March 2008 DOH Environmental Planning Office staff directed the preparer's staff to our Standard Comments and discussed at length the proposed project's potential effects on DOH plans to implement water quality standards for impaired waterbodies (TMDLs) in Kawa Stream and South Kaneohe Bay. Part 5 of these Standard Comments states:

"If the proposed project involves potentially affected water bodies that appear on the current *List of Impaired Waters in Hawaii Prepared under Clean Water Act §303(d)*, identify and quantify expected changes in the following site and watershed conditions and characteristics:

- surface permeability
- hydrologic response of surface (timing, magnitude, and pathways)
- receiving water hydrology
- runoff and discharge constituents
- pollutant concentrations and loads in receiving waters
- aquatic habitat quality and the integrity of aquatic biota

Where TMDLs are already established they include pollutant load allocations for the surrounding lands and point source discharges. In these cases, we suggest that the submittal specify how the proposed project would contribute to achieving the applicable load reductions."

In this regard, please note that DOH does not necessarily equate conformance with City stormwater retention design criteria; issuance of City Drainage Master Plan, Erosion Control, and Best Management Practice Plan approvals; and issuance of State NPDES (NGPC-C for construction stormwater) and City Grading permit coverages with satisfactory TMDL implementation and long-term attainment of state water quality standards in associated receiving waters. The DEIS acknowledges that existing runoff (sheetflow) from the proposed project area is collected in surrounding residential neighborhoods before discharging into stream and storm pipe networks, implying that this runoff is flows into the City drainage infrastructure regulated by a NPDES MS4 permit issued by DOH.

In final discussion of potential project impacts upon water quality, we suggest that the EIS specify in greater and more quantitative detail how the proposed project would contribute to achieving the Load Allocations assigned to nonpoint sources throughout the Kawa Stream watershed. In particular, during stormflow conditions, load reductions in Total Suspended

Mr. Morford  
July 21, 2008  
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Solids, Total Nitrogen, and Total Phosphorus are required in order to attain water quality standards in the stream.

Storm runoff and debris flow from the proposed project area is already a notable problem at the existing Lipalu St. detention basin. We suggest that additional management measures, beyond merely retaining the entire post-project increase in 10-year, 1-hour runoff volume, be implemented to reduce pollutant loading at this Kawa Stream headwater. In this regard, we are also concerned that the high velocity of storm flows generated over the steep slopes above the proposed project area may overwhelm some of the proposed shallow detention areas before they fill to the design volume. Thus it would be helpful to identify on Figure 27 the proposed location of the two deeper detention structures and the contributing area and flow paths affecting each of the 10 detention structures.

Two sections of the DEIS seem to merit particular correction and clarification. On p. 6-14, we suggest that "Discharge in to Kawa Stream is permitted with a NPDES permit" provided that permits for new or increased discharges may not be permissible unless there is sufficient loading capacity available within the TMDL to accept that discharge. Also, we suggest that all areas, including residential areas, within the MS4 service area are considered part of the jurisdiction of MS4 permits. On p. 6-15, we suggest that statements regarding the low production of N levels from the sub-basin of the petition area (which appears to include portions of sub-basins 3 and 4) be documented with explicit citations to data and information found in the DOH TMDL documents. Regardless of the relative amount of N produced in comparison with whole-watershed N production, the role of the petition area in pollutant load reductions is the most significant factor to address.

Finally, we note that although "cultural consultations for this study did not discuss freshwater resources in or around the proposed project area" (p. 88 of Appendix G.), existing uses of Kawa Stream, other inland waters in the Kawa watershed, and receiving waters in Waikualo and South Kaneohe Bay include known support for traditional and customary native Hawaiian beliefs, values and practices, and any potential impacts to these uses from the proposed project should be assessed and mitigated accordingly.

#### General

We strongly recommend that you review all of the Standard Comments on our website: [www.hawaii.gov/health/ehi/imp/imp/total\\_water\\_sdwb\\_index.html](http://www.hawaii.gov/health/ehi/imp/imp/total_water_sdwb_index.html). Any comments specifically applicable to this project should be adhered to.



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Mr. Kelvin H. Sunada  
Manager  
Environmental Planning Office  
Department of Health  
PO Box 3378  
Honolulu, HI 96801-3378



Mr. Merford  
July 21, 2008  
Page 6

If there are any questions about these comments please contact Jiacai Liu with the Environmental Planning Office at 586-4346.

Sincerely,

KELVIN H. SUNADA, MANAGER  
Environmental Planning Office

c: EPO  
CWB  
SDWB  
TMDL

Dear Mr. Sunada:

Draft Environmental Impact Statement  
Hawaian Memorial Park Cemetery Expansion  
TMK (1)4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 21, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Any project and its potential impacts to State waters must meet the following criteria:
  - a. Antidegradation policy (HAR, Section 11-54-1.1), which requires that the existing uses and the level of water quality necessary to protect the existing uses of the receiving State water be maintained and protected.
  - b. Designated uses (HAR, Section 11-34-3), as determined by the classification of the receiving State waters.
  - c. Water quality criteria (HAR, Sections 11-544 through 11-54-8).

Response: We note and agree that the project and potential impacts to State waters must meet the criteria for the antidegradation policy; designated uses; and water quality.

2. As identified in the DEIS, Kawa Stream has been categorized as an impaired water body under Section 303(d) of the Clean Water Act. Consequently, a decision on Allocations of Total Maximum Daily Loads of total Suspended Solids, Nitrogen and Phosphorus for Kawa Stream, dated June 2005, was proposed to the U.S. EPA and the EPA approved the proposed decision in September 2005. This allocation decision identified the existing cemeteries as a nonpoint source priority area for the reduction

of nitrogen and sediment loadings. Accordingly, the subject DEIS for the proposed cemetery expansion should address load reduction practices/measures that will be applied toward achieving compliance with the applicable water quality parameters and nonpoint source load allocations for Kawa Stream.

**Response:** Retention areas are proposed as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage.

Additional study and analysis related to Total Maximum Daily Load (TMDL) for Kāwā Stream was done for the project. The study has been summarized in Section 6.4 of the Final EIS and also attached as Appendix L (and is also attached to this letter). While storm water runoff associated with the project will be increased because of the added impervious surfaces of the roadways and mausoleums within the cemetery expansion area, only 8.5% (4.8 acres) of the Petition Area is considered impervious for the purposes of calculating runoff.

The TMDL analysis found that the proposed retention system which has been developed to satisfy the City and County of Honolulu's design 10-year, 1-hour duration (2.5 inches per hour) storm event will capture all of the runoff generated by the daily rainfall events used to generate the Kawai Watershed TMDLs. The on-site retention volume to capture this excess runoff is 589,215 gallons, compared to the 518,060 gallons identified in the 2005 TMDL allocation study. The retention areas will be designed to ensure that pollutant levels of TSS, TN, and TP that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels, and instead will be managed on-site. They are projected to provide 27.5% of the net reduction of TSS that is required, 17.5% of the reduction for TN and 17.0% for TP required to achieve the load allocations that were set for Kāwā Stream in the U.S. EPA-approved allocation study (Element Environmental, 2008).

The Petitioner commits to developing an appropriate monitoring protocol in cooperation with the State Department of Health to build on past monitoring efforts of the TMDL program, and to evaluate long-term the success of the Petition Area's retention areas in helping to meet the necessary load reductions for Kāwā Stream that are associated with the Petition Area. The monitoring program would include the following: establish a baseline monitoring station at Station 16 (DOH's Monitoring

Station 6) in order to evaluate potential changes to dry and wet season baseflow water quality resulting from the project; and quarterly groundwater monitoring during construction activities and for the first three years of operation of the expanded cemetery. In order to re-establish the baseline (pre-construction) water quality conditions at Station 16, a minimum of four rounds of sampling would be conducted prior to the initiation of construction. The streamflow volume would be measured at the time of sampling, and sample would be analyzed for pH, temperature, salinity, conductivity, TN, TP, and TSS. The data collected would be compared to the dry and wet season baseline water quality data collected by DOH between 1999 and 2000.

3. You are required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharges of wastewater, including storm water runoff, into State surface waters (HAR Chapter 11.55). For the following types of discharges into Class A or Class 2 State waters, you may apply for NPDES general permit coverage by submitting a Notice of Intent (NOI) form:

- a. Storm water associated with construction activities, including clearing, grading, and excavation, that result in the disturbance of equal to or greater than one (1) acre of total land area. The total land area includes a contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under a larger common plan of development or sale. An NPDES permit is required before the start of the construction activities.
- b. Hydrotesting water.
- c. Construction dewatering effluent.
- d. Well drilling activities.

You must submit a separate NOI form for each type of discharge at least 30 calendar days prior to the start of the discharge activity, except when applying for coverage for discharges of storm water associated with construction activity. For this type of discharge, the NOI must be submitted 30 calendar days before to the start of construction activities.

**Response:** The Draft EIS notes in Section 1.7 that the project will be required to obtain a NPDES permit.

4. For types of wastewater not listed in Item No. 3 above or wastewater discharging into Class 1 or Class AA waters, you may need an NPDES individual permit. An application for an NPDES individual permit must be submitted at least 180 calendar days before the commencement of the

discharge.

Response: Please refer to #3 above.

5. You must also submit a copy of the NOI or NPDES permit application to the State Department of Land and Natural Resources, State Historic Preservation Division (SHPD), or demonstrate to the satisfaction of the CWB that SHPD has or is in the process of evaluating your project. Please submit a copy of your request for review by SHPD or SHPD's determination letter for the project along with your NOI or NPDES permit application, as applicable.

Response: We note that we must also submit a copy of the NPDES permit application to the SHPD.

6. Please note that all discharges related to the project construction or operation activities, whether or not NPDES permit coverage is required, must comply with the State's Water Quality Standards. Noncompliance with water quality requirements contained in HAR, Chapter 11-54, and/or permitting requirements, specified in HAR, Chapter 11-55, may be subject to penalties of \$25,000 per day per violation.

Response: We note that all discharges related to project construction or operation activities must comply with the State's Water Quality Standards.

7. The Draft Environmental Impact Statement states that the Hawaiian Memorial Park will create an on-site water system with a new well and storage facility to supply the drinking water for the proposed 20-lot subdivision and a cemetery comfort station, and as such, will be a regulated public water system under DOH rules, HAR 11-20. The Hawaiian Memorial Park is required to obtain the DOH approval to use the water from the new well for drinking water purposes. An Engineering Report prepared by a licensed professional engineer, which includes the analytical test result of the testing for Federal and State regulated contaminants in drinking water, is required.

Response: We want to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension. Consequently, no on-site water system or storage facility will be required. The need for potable water for a drinking fountain and proposed restroom has been greatly reduced. No new domestic drinking water source will be required.

8. The Safe Drinking Water Act as amended in 1996 also requires all new public water systems which serves at least fifteen service connections used by year-round residents or regularly serves at least twenty-five year-round residents, to demonstrate adequate technical, managerial, and financial capacity before approval to begin water system operations can be granted.

Response: Please refer to the answer to Question #7 above.

9. Where TMDLs are already established they include pollutant load allocations for the surrounding lands and point source discharges. In these cases, we suggest that the submittal specify how the proposed project would contribute to achieving the applicable load reductions.

Response: Please refer to the answer to Question #2 above.

10. In this regard, please note that DOH does not necessarily equate conformance with City stormwater retention design criteria; issuance of City Drainage Master Plan, Erosion Control, and Best Management Practice Plan approvals; and issuance of State NPDES (NGPC-C for construction stormwater) and City Grading permit coverage with satisfactory TMDL implementation and long-term attainment of state water quality standards in associated receiving waters. The DEIS acknowledges that existing runoff (sheetflow) from the proposed project area is collected in surrounding residential neighborhoods before discharging into stream and storm pipe networks, implying that this runoff is flows into the City drainage infrastructure regulated by a NPDES MS4 permit issued by DOH.

Response: We note that conformance with City storm water retention design criteria; issuance of a City Drainage Master Plan, Erosion Control, and Best Management Practice Plan approvals; and issuance of State NPDES (NGPC-C for construction stormwater) and City Grading permit coverage does not necessarily equate to satisfactory TMDL implementation and long-term attainment of state water quality standards. Please refer to the discussion in Question #2 above for discussion of the retention areas.

11. In final discussion of potential project impacts upon water quality, we suggest that the EIS specify in greater and more quantitative detail how the proposed project would contribute to achieving the Load Allocations assigned to nonpoint sources throughout the Kawa Stream watershed. In

particular, during stormflow conditions, load reductions in Total Suspended Solids, Total Nitrogen, and Total Phosphorus are required in order to attain water quality standards in the Stream.

Response: Please refer to the answer to Question #2 above.

12. Storm runoff and debris flow from the proposed project area is already a notable problem at the existing Lipalu St. detention basin. We suggest that additional management measures, beyond merely retaining the entire post-project increase in 10-year, 1-hour runoff volume, be implemented to reduce pollutant loading at this Kawa Stream headwater. In this regard, we are also concerned that the high velocity of storm flows generated over the proposed shallow detention areas before they fill to the design volume. Thus it would be helpful to identify on Figure 27 the proposed location of the two deeper detention Structures and the contributing area and flow paths affecting each of the two detention structures.

Response: Please refer to the answer to Question #2 above.

13. Two sections of the DEIS seem to merit particular correction and clarification. On p. 6-14, we suggest that "Discharge in to Kawa Stream is permitted with a NPDES permit" provided that permits for new or increased discharges may not be permissible unless there is sufficient loading capacity available within the TMDL to accept that discharge.

Response: The language in the Final EIS has been changed to clarify that new or increased discharge is only allowed when sufficient loading capacity is available.

14. Also, we suggest that all areas, including residential areas, within the MS4 service area are considered part of the jurisdiction of MS4 permits. On p. 6-15, we suggest that statements regarding the low production of N levels from the sub-basin of the petition area (which appears to include portions of sub-basins 3 and 4) be documented with explicit citations to data and information found in the DOH TMDL documents. Regardless of the relative amount of N produced in comparison with whole watershed N production, the role of the petition area in pollutant load reductions is the most significant factor to address.

Response: Information from the Element Environmental 2008 TMDL analysis done for this project has been incorporated into Section 6.4.1 of the Final EIS, and citations have been added.

15. Finally, we note that although cultural consultations for this study did not discuss freshwater resources in or around the proposed project area" (p. 88 of Appendix G), existing uses of Kawa Stream, other inland waters in the Kawa watershed, and receiving waters in Waikalua Loko and South Kanohe Bay include known support for traditional and customary native Hawaiian beliefs, values and practices, and any potential impacts to these uses from the proposed project should be assessed and mitigated accordingly.

Response: The Petition Area is not bordering any flowing water or wetland, and there is no route through the Petition Area for people to access these resources. In addition, the Cultural Impact Assessment that was performed for the project did not provide any information or recommendations related to freshwater resources. Please refer to the answer to Question #2 above as the project is expected to help to improve the water quality of Kāwā Stream and ultimately Kāne'ōhe Bay.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
EPO  
CWB  
SDWB  
TMDL

## TMDL Analysis Report

### Kawa Stream TMDL Analysis for Hawaiian Memorial Park Expansion Kaneohe, Oahu, Hawaii



Prepared for:

Helber Hastert & Fee, Planners, Inc.



Helber Hastert & Fee  
PLANNERS

Prepared by:



element environmental llc  
environmental - engineering - water resources  
62-180 Emerson Road  
Haleiwa, HI 96712

September 2008

**Question to Answer:** Since the proposed cemetery development is located within an impaired water body (Kawa Stream) for which TMDLs have been developed, we are asked to demonstrate how the proposed project will contribute to the achievement of the pollutant load reductions suggested in the Kawa Stream TMDL technical studies (Oceanit, 2002; DOH, 2005).

**Response to Question:** We use the DOH TMDL methodology (DOH, 2005) to calculate the incremental change in TSS, TN and TP load to Kawa Stream resulting from the proposed expansion of the Hawaiian Memorial Cemetery. The salient facts with respect to the proposed development include:

- The proposed 56.6-acre development will contain 25.8 acres of cemetery, 15.3 acres of vegetative buffer, 9.5 acres of cultural preserve, 4.8 acres of impervious land (mausoleums, roadways, etc.) and 1.2 acres of retention features.
- A total of 4.8 acres, or about 8.5%, of the proposed development is considered impervious for the purposes of calculating runoff in the TMDL analysis.
- The developer is required to capture the excess runoff generated from the proposed development area by the 10 year, one-hour duration storm event (2.5 inches/hour).
- The required on-site retention volume to capture this excess runoff is calculated to be 78,772 cubic feet (589,215 gallons).
- The retention areas will consist of 1.20-acres of depressed turf or grassy planted areas with a maximum depth of 18 inches that are scattered throughout the cemetery.
- The soils on the project site have permeability rates that range from 2.0 to 6.3 inches/hour (Soil Survey of Islands of Kauai, Oahu, Maui, Molokai, and Lanai, State of Hawaii Soil Conservation Service), resulting in an estimated time of between 2.86 to 9 hours for the retained runoff to percolate into the soil from a filled retention basin.

The revised TMDL document (DOH, 2005) allocated the calculated stormwater runoff volume to the various land-uses and sub-basins present within the Kawa watershed. The vast majority of the proposed cemetery expansion will be located within Basin 4 of the watershed. Basin 4 is comprised in part of 135.25 acres of forest land (Table 3.1; DOH, 2005), from which 1.15 million cubic feet (~8.6 million gallons) of storm runoff is generated (Table 4.3). The proposed development will convert 56.6 acres (~42%) of the existing forest land within the Basin 4 watershed into cemetery and associated vegetative buffer and preserve lands. The runoff volume calculated in the original TMDL analysis for the 56.6 acres of land to undergo conversion was 0.481 million cubic feet (~3.6 million gallons/13.63 million liters). The mass of nutrients calculated by the original TMDL analysis to originate from the 56.6 area to be developed was calculated by multiplying the estimated runoff volume by the runoff concentration (Table 5.1; DOH, 2005) associated with forest land for the “Storm Runoff Sources” scenario (Table 1 below).

**Table 1: Estimated Mass of TSS and Nutrients Entering Kawa Stream from 56.6-Acres of Forest Land Under Existing Conditions**

Land Use	Runoff Concentrations (mg/L)		Estimated Runoff from 56.6 acres land (liters)		Mass in Runoff (Kg)	
	TSS	Total P	Total N	Total P	TSS	Total N
Forest Land	10	0.5	0.1	13,630,000	136.3	6.815
						1.363

The runoff to Kawa stream resulting from the proposed development was calculated using the same methodology used in the revised TMDL analysis (DOH, 2005). The daily rainfall record from rainfall station 838.1 from November 1999 to October 2000 was used to calculate runoff on a daily basis for the proposed 56.6-acre development. In order to adjust the daily rainfall collected at the reference station (838.1, elevation 50 feet) to the estimated value of rainfall for Basin 4, with an estimated average elevation of 600 feet, the daily reference station rainfall was multiplied by the following relation [1]:

$$[1] \text{ Adjusted Basin Rainfall (inches)} = [\text{rainfall} * (1 + 0.000864 * 600 \text{ ft}) / (1 + 0.000864 * 50 \text{ ft}) = 1.456 * \text{reference station daily rainfall}]$$

The TMDL analysis used the following rational formula runoff expression that is used for determination of pollutant loads in the City and County of Honolulu MS4 permit application:

$$[2] R = (P) * (p_r) * (R_v) * A$$

$$[3] R_v = 0.05 + 0.9f_i$$

where:

R = Runoff volume

P = Adjusted Daily Basin Rainfall (ft)

$p_r$  = Fraction of rainfall that produces runoff (0.9 used by Honolulu)

$R_v$  = Mean runoff coefficient

A = Area of Proposed Development (56.6 acres)

$f_i$  = Fraction of area that is effectively impervious.

The fraction impervious area ( $f_i$ ) in equation 3 for the proposed development is 0.085, which leads to a mean runoff coefficient ( $R_v$ ) value for the development of 0.1265. No carryover of stored water was assumed during consecutive days of rainfall since the retention basins are designed to completely infiltrate their contents in less than 10 hours. The total volume of runoff produced by the 56.6 acre cemetery expansion was calculated on a daily basis and compared to the volume of retention designed for the proposed development (Appendix). This analysis shows that the proposed retention system, which was developed to satisfy the City and County of Honolulu's design 10-year one-hour duration (2.5 inches/hour) storm event, will capture all of the runoff generated by the daily rainfall events used to generate the Kawa watershed TMDLs. The maximum adjusted daily rainfall for the TMDL period occurred on 9/28/00 (3.01 inches) which generated 518,060 gallons of runoff from the 56.6-acre proposed development area. This runoff volume is less than the designed storage volume (589,215 gallons) of the retention systems that will be constructed within the proposed cemetery expansion area. It is interesting to note that the designed retention system will also capture all of the runoff associated with the Wet Season 2% Rainfall Event (2.30 inches) that was used to calculate runoff and pollutant load contributions in the recently completed TMDL analysis for the adjacent Kaneohe Stream watershed (DOH, 2008). Since no runoff will reach Kawa stream according to these TMDL-based calculations, a net reduction of 136.3 kg TSS, 6.82 kg total N, and 1.363 kg will result from the proposed cemetery expansion.

Table 2 summarizes the reductions required from all of the nonpoint sources (including the existing Hawaiian Memorial Park) located within the Kawa watershed in the TMDL study (DOH, 2005). The proposed development achieves approximately 27.5% of the net reduction in TSS, 17.5% of the net reduction in total nitrogen, and 17% of the net reduction in total phosphorus required for all nonpoint source areas located within the Kawa watershed by the TMDL study.

Scenario	Existing Loads (Kg)			Reductions Required by TMDL (Kg)		
	TSS	TN	TP	TSS	TN	TP
Annual Storm Runoff	1,286	59	15	496	39	8
Net Mass TSS and Nutrients Reduced Entering Kawa Stream- 10 Year Retention Basin Design				136.3	6.82	1.363
Percentage of the Total Reduction Required by TMDL Achieved by the Proposed Project				27.5%	17.5%	17.0%

In order to evaluate potential changes to dry and wet season baseflow water quality resulting from the proposed development, baseline monitoring will be initiated at Station 16 (DOH's Monitoring Station 6). This proposed monitoring station is located in the upper portion of the Kawa watershed that receives baseflow from sub-basin 4 of the TMDL analysis (the area directly impacted by the proposed expansion) (Figure 1).

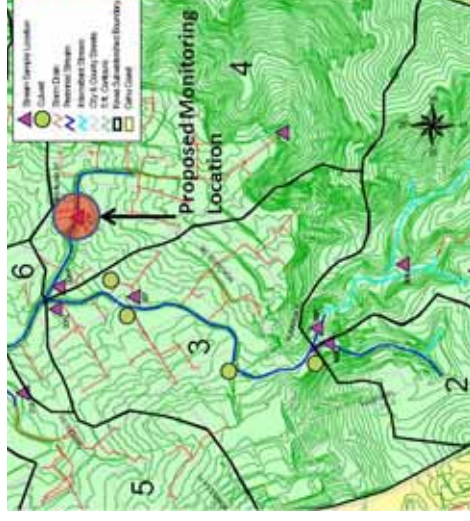


FIGURE 1: Proposed Stream Monitoring Location

In order to re-establish the baseline (pre-construction) water quality conditions at this sampling location, a minimum of four rounds of sampling should be conducted prior to the initiation of construction. In addition, quarterly groundwater monitoring will be conducted during construction activities and for the first three years of operation of the expanded cemetery. The streamflow volume will be measured at the time of sampling. The stream samples will be analyzed for the following field parameters: pH, temperature, salinity, and conductivity. The samples will be submitted to an analytical laboratory for analysis of the following constituents: total nitrogen, nitrate + nitrite nitrogen, total phosphorous and total suspended sediment. The data collected will be compared to the dry and wet season baseline water quality data collected by DOH and Oceanit between 1999 and 2000.

**References:**

- Hawaii Department of Health, Environmental Planning Office 2005. Allocations of Total Maximum Daily Loads of Total Suspended Solids, Nitrogen and Phosphorus for Kawa Stream Kaneohe, Hawaii. Report dated June 2005.
- Hawaii Department of Health, Environmental Planning Office 2008. Total Maximum Daily Loads (TMDLs) for Total Suspended Solids, Nitrogen and Phosphorus in Kaneohe Stream, Kaneohe, Hawaii. Report dated August 2008.
- Oceanit, 2002. Total Maximum Daily Loads of Total Suspended Solids, Nitrogen and Phosphorus for Kawa Stream, Kaneohe, Hawaii. Report dated March 2002.

**APPENDIX A**

Date	Reference Rainfall (Sin 83&#8.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
11/1/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
11/2/1999	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
11/3/1999	0.13	0.19	285,772	32,535	589,215	NO RUNOFF
11/4/1999	0.22	0.32	483,615	55,060	589,215	NO RUNOFF
11/5/1999	0.12	0.17	263,790	30,032	589,215	NO RUNOFF
11/6/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
11/7/1999	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
11/8/1999	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
11/9/1999	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
11/10/1999	0.08	0.12	175,860	20,022	589,215	NO RUNOFF
11/11/1999	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
11/12/1999	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
11/13/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/14/1999	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
11/15/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
11/16/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/17/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/18/1999	0.11	0.16	241,807	27,530	589,215	NO RUNOFF
11/19/1999	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
11/20/1999	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
11/21/1999	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
11/22/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/23/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/24/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/25/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/26/1999	0.08	0.12	175,860	20,022	589,215	NO RUNOFF
11/27/1999	0.00	0.00	0	0	589,215	NO RUNOFF
11/28/1999	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
11/29/1999	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
11/30/1999	0.00	0.00	0	0	589,215	NO RUNOFF
12/1/1999	0.45	0.66	989,212	112,622	589,215	NO RUNOFF
12/2/1999	0.57	0.83	1,253,002	142,654	589,215	NO RUNOFF
12/3/1999	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
12/4/1999	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
12/5/1999	0.21	0.31	461,632	52,557	589,215	NO RUNOFF

Date	Reference Rainfall (Sin 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
1/14/2000	0.64	0.93	1,406,880	160,173	589,215	NO RUNOFF
1/15/2000	0.23	0.33	505,597	57,562	589,215	NO RUNOFF
1/16/2000	0.17	0.25	375,702	42,546	589,215	NO RUNOFF
1/17/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
1/18/2000	0.13	0.19	285,772	32,535	589,215	NO RUNOFF
1/19/2000	0.16	0.23	351,720	40,043	589,215	NO RUNOFF
1/20/2000	1.74	2.53	3,824,955	435,471	589,215	NO RUNOFF
1/21/2000	0.45	0.66	989,212	112,622	589,215	NO RUNOFF
1/22/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
1/23/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/24/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/25/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/26/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/27/2000	0.41	0.60	901,282	102,611	589,215	NO RUNOFF
1/28/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/29/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/30/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/31/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/1/2000	0.17	0.25	375,702	42,546	589,215	NO RUNOFF
2/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/3/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/5/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/6/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/7/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/9/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/11/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/12/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
2/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/14/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/17/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/18/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/19/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
2/20/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/21/2000	0.00	0.00	0	0	589,215	NO RUNOFF

Date	Reference Rainfall (Sin 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
12/16/1999	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
12/17/1999	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
12/18/1999	0.00	0.00	0	0	589,215	NO RUNOFF
12/19/1999	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
12/20/1999	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
12/21/1999	2.02	2.94	4,440,465	505,547	589,215	NO RUNOFF
12/22/1999	0.54	0.79	1,187,055	135,146	589,215	NO RUNOFF
12/23/1999	0.12	0.17	265,790	30,032	589,215	NO RUNOFF
12/24/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
12/25/1999	0.39	0.57	857,317	97,606	589,215	NO RUNOFF
12/26/1999	0.00	0.00	0	0	589,215	NO RUNOFF
12/27/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
12/28/1999	0.60	0.87	1,318,950	150,162	589,215	NO RUNOFF
12/29/1999	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
12/30/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
12/31/1999	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
1/1/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/3/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/4/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
1/5/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/6/2000	0.12	0.17	265,790	30,032	589,215	NO RUNOFF
1/7/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
1/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
1/9/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
1/10/2000	0.11	0.16	241,807	27,530	589,215	NO RUNOFF
1/11/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
1/12/2000	0.11	0.16	241,807	27,530	589,215	NO RUNOFF
1/13/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF



Date	Reference Rainfall (Sin 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
4/1/2000	1.31	1.91	2,879,707	327,855	589,215	NO RUNOFF
4/2/2000	0.19	0.28	1,472,827	47,551	589,215	NO RUNOFF
4/3/2000	0.67	0.98	1,472,827	167,681	589,215	NO RUNOFF
4/4/2000	0.05	0.07	1,09,912	12,514	589,215	NO RUNOFF
4/5/2000	0.08	0.12	175,860	20,022	589,215	NO RUNOFF
4/6/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
4/7/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
4/8/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
4/9/2000	0.36	0.52	791,370	90,097	589,215	NO RUNOFF
4/10/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
4/11/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
4/12/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
4/13/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
4/14/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
4/15/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
4/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
4/17/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
4/18/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
4/19/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
4/20/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
4/21/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
4/22/2000	0.00	0.00	0	0	589,215	NO RUNOFF
4/23/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
4/24/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
4/25/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
4/26/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
4/27/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
4/28/2000	0.00	0.00	0	0	589,215	NO RUNOFF
4/29/2000	0.00	0.00	0	0	589,215	NO RUNOFF
4/30/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/1/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/3/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
5/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/5/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/6/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
5/7/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF
5/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/9/2000	0.00	0.00	0	0	589,215	NO RUNOFF

Date	Reference Rainfall (Sin 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
2/12/2000	0.08	0.12	175,860	20,022	589,215	NO RUNOFF
2/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/14/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
2/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
2/16/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
2/17/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
2/18/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
2/19/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/1/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
3/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/3/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/5/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
3/6/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/7/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/9/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/11/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/12/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/14/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/15/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
3/16/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
3/17/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/18/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
3/19/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
3/20/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/21/2000	0.00	0.00	0	0	589,215	NO RUNOFF
3/22/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
3/23/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
3/24/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
3/25/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF
3/26/2000	0.23	0.33	505,597	57,562	589,215	NO RUNOFF
3/27/2000	0.48	0.70	1,055,160	120,130	589,215	NO RUNOFF
3/28/2000	0.20	0.29	439,650	50,054	589,215	NO RUNOFF
3/29/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
3/30/2000	0.27	0.39	593,527	67,573	589,215	NO RUNOFF
3/31/2000	0.44	0.64	967,230	110,119	589,215	NO RUNOFF

Date	Reference Rainfall (\$in 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
6/18/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
6/19/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/20/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/21/2000	0.08	0.12	175,860	20,022	589,215	NO RUNOFF
6/22/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
6/23/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/24/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
6/25/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
6/26/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
6/27/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/28/2000	0.15	0.22	329,737	37,541	589,215	NO RUNOFF
6/29/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
6/30/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
7/1/2000	0.13	0.19	285,772	32,535	589,215	NO RUNOFF
7/2/2000	0.31	0.45	688,457	77,584	589,215	NO RUNOFF
7/3/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
7/4/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
7/5/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
7/6/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/7/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/9/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/11/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
7/12/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
7/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/14/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/15/2000	0.20	0.29	439,650	50,054	589,215	NO RUNOFF
7/16/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/17/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/18/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/19/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/20/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/21/2000	0.38	0.55	835,335	95,103	589,215	NO RUNOFF
7/22/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
7/23/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
7/24/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
7/25/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
7/26/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF

Date	Reference Rainfall (\$in 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
5/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/11/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
5/12/2000	0.25	0.36	549,562	62,568	589,215	NO RUNOFF
5/13/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
5/14/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
5/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/17/2000	0.61	0.89	1,340,932	152,665	589,215	NO RUNOFF
5/18/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/19/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
5/20/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
5/21/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
5/22/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
5/23/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
5/24/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
5/25/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
5/26/2000	0.00	0.00	0	0	589,215	NO RUNOFF
5/27/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
5/28/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
5/29/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
5/30/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
5/31/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
6/1/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
6/2/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/3/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/5/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/6/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
6/7/2000	0.20	0.29	439,650	50,054	589,215	NO RUNOFF
6/8/2000	0.18	0.26	395,685	45,049	589,215	NO RUNOFF
6/9/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/11/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/12/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/13/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/14/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
6/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
6/17/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF

Date	Reference Rainfall (\$in 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
9/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/5/2000	0.19	0.28	417,667	47,551	589,215	NO RUNOFF
9/6/2000	0.44	0.64	967,230	110,119	589,215	NO RUNOFF
9/7/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
9/8/2000	0.14	0.20	307,755	35,038	589,215	NO RUNOFF
9/9/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
9/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/11/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
9/12/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF
9/13/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
9/14/2000	1.29	1.88	2,835,742	322,849	589,215	NO RUNOFF
9/15/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
9/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/17/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/18/2000	0.14	0.20	307,755	35,038	589,215	NO RUNOFF
9/19/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/20/2000	0.25	0.36	549,562	62,568	589,215	NO RUNOFF
9/21/2000	0.21	0.31	461,632	52,557	589,215	NO RUNOFF
9/22/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
9/23/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/24/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/25/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/26/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
9/27/2000	0.30	0.44	659,475	75,081	589,215	NO RUNOFF
9/28/2000	2.07	3.01	4,550,377	518,060	589,215	NO RUNOFF
9/29/2000	0.20	0.29	439,650	50,054	589,215	NO RUNOFF
9/30/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
10/1/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/3/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/5/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
10/6/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/7/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/9/2000	0.06	0.09	131,895	15,016	589,215	NO RUNOFF
10/10/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/11/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
10/12/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF

Date	Reference Rainfall (\$in 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
7/27/2000	0.05	0.07	109,912	12,514	589,215	NO RUNOFF
7/28/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
7/29/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
7/30/2000	0.00	0.00	0	0	589,215	NO RUNOFF
7/31/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
8/1/2000	0.14	0.20	307,755	35,038	589,215	NO RUNOFF
8/2/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
8/3/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
8/4/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/5/2000	0.15	0.22	329,737	37,541	589,215	NO RUNOFF
8/6/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/7/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/8/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/9/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/10/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
8/11/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/12/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
8/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/14/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/16/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/17/2000	0.20	0.29	439,650	50,054	589,215	NO RUNOFF
8/18/2000	0.27	0.39	593,527	67,573	589,215	NO RUNOFF
8/19/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/20/2000	0.10	0.15	219,825	25,027	589,215	NO RUNOFF
8/21/2000	1.50	2.18	3,297,375	375,406	589,215	NO RUNOFF
8/22/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
8/23/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/24/2000	0.03	0.04	65,947	7,508	589,215	NO RUNOFF
8/25/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/26/2000	0.00	0.00	0	0	589,215	NO RUNOFF
8/27/2000	0.11	0.16	241,807	27,530	589,215	NO RUNOFF
8/28/2000	0.14	0.20	307,755	35,038	589,215	NO RUNOFF
8/29/2000	0.19	0.28	417,667	47,551	589,215	NO RUNOFF
8/30/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
8/31/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/1/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
9/2/2000	0.00	0.00	0	0	589,215	NO RUNOFF
9/3/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF

Date	Reference Rainfall (5in 838.1)	Adjusted Rainfall for Basin 4	Volume of Rainfall on 56.6 Acre Development (gallon)	Estimated Runoff with 8.5% Impermeable Surface (gallon)	On-Development Retention Storage Volume (10-Year Design Storm) (gallon)	Net Runoff to Kawa Stream from Development
10/13/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/14/2000	0.23	0.33	505,597	57,562	589,215	NO RUNOFF
10/15/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/16/2000	0.04	0.06	87,930	10,011	589,215	NO RUNOFF
10/17/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
10/18/2000	0.01	0.01	21,982	2,503	589,215	NO RUNOFF
10/19/2000	0.30	0.44	659,475	75,081	589,215	NO RUNOFF
10/20/2000	0.02	0.03	43,965	5,005	589,215	NO RUNOFF
10/21/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/22/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/23/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/24/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF
10/25/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF
10/26/2000	0.07	0.10	153,877	17,519	589,215	NO RUNOFF
10/27/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/28/2000	0.00	0.00	0	0	589,215	NO RUNOFF
10/29/2000	0.38	0.55	885,335	95,103	589,215	NO RUNOFF
10/30/2000	1.33	1.94	2,923,672	322,860	589,215	NO RUNOFF
10/31/2000	0.09	0.13	197,842	22,524	589,215	NO RUNOFF

Peter & Bella Swenson  
 45-155 Niamoku Street  
 Kaneohe, HI 96744  
 July 22, 2008

Mr. Jay Morford  
 General Manager  
 Hawaiian Memorial Life Plan, Ltd.  
 1330 Maunakea Street  
 Honolulu, HI 96813

Dear Mr. Morford:

We have lived at this address for nearly 19 years, and have lived on the other side of the island for 26 years before that.

EVERYONE in the Pikoioa neighborhood is against this plan.

We have enough traffic, speeding cars, flooding, and runoff in our neighborhood as it is. I disagree with the assumption that the baby boomers need plots, we would be buying them already and there would be no supply left.

Everyone I know prefers cremation so I think the story there are using to support the expansion needs is extremely exaggerated.

That is why they won't share their "numbers".

The Dallas based owners of Hawaiian Memorial Park do not care about the people in our neighborhood, they only care about money.


The "cemetery" expansion is simply a ploy to rezone their land to build houses for big bucks.

But I am certain that our property values will decrease as soon as the project is approved, most people will not buy a house next to a cemetery.

If they want to expand, let them buy Mililani Memorial where the expansion is unlimited. If I wanted to live next to a cemetery I would have bought a house next to the current HMP plots or at the old Waialae Drive-in site.

There are millions of acres of ag land on the other side of the island that are no where near any residential neighborhoods and can be used for cemetery expansion.

The people before us zoned this as conservation land for a reason and it should be kept that way. This zoning change is unwanted and unwarranted.

Sincerely,  
  
 Peter & Bella Swenson

cc: Office of Environmental Quality Control  
 Land Use Commission, State of Hawaii  
 Helber Hastert & Fee, Planners

October 8, 2008

Peter & Bella Swenson  
45-155 Namoku Street  
Kāneʻohe, HI 96744

Dear Mr. & Mrs. Swenson:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaiʻi

Thank you for your letter dated July 22, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We have enough traffic, speeding cars, flooding, and runoff in our neighborhood as it is.

Response: As discussed in detail in Section 6.1 of the EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project.

We would like to point out that Hawaiian Memorial Park (HMP) has modified the Proposed Action in two significant ways: (1) the 20-lot residential subdivision has been deleted from the development program; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawaʻeʻaʻe Heiau. As a result of elimination of the 20-lot subdivision, the Lipalu Street extension has also been eliminated. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.



In regard to flooding, HMP is aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Retention areas are proposed as the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the cemetery expansion area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

2. Disagree with the assumption that the baby boomers need plots, we would be buying them already and there would be no supply left.

Response: As discussed in the EIS, Section 1.8, the Need for Action, HMP believes there is a very real need for cemetery services on Oʻahu. HMP anticipates it will exhaust its available supply of burial plots in the near-term. The need for burial services in Hawaiʻi is a very real community service, and is in fact rising. Hawaiʻi's resident population over the age of 55 is on the rise, a trend which reflects the baby boomer generation moving into and through their 50s and 60s. At the current annual rate of ground burial and with the expected increase in numbers of burials associated with Hawaiʻi's aging population (also see discussion in Section 5.1 of the EIS), HMP will need to expand its inventory in order to meet increasing demand. HMP currently accommodates approximately 25% of all burials in Hawaiʻi, and will have significantly constrained inventory resources over the next five years. In order to continue to provide this service to the community, HMP must expand its ability to

accommodate both casketed burials and niches. HMP understands the demand and need for additional inventory and the human experience that accompanies this very important event. Not everyone buys a plot in advance, and the numbers of the population approaching past middle age are certainly increasing.

3. Our property values will decrease as soon as the project is approved, most people will not buy a house next to a cemetery.

Response: There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community and people have accepted them as neighbors. This is also the case for HMP. In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. On average, property values and home sale prices are not any lower for the Parkview neighborhood than for the Pikoioa neighborhood. Additionally, some studies that examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price. HMP is used by its neighbors as a park by walkers, runners, and others who enjoy the open space and quiet in a passive manner. There is a strong argument to be made that HMP is an amenity for its neighbors.

4. Should buy Mililani Memorial where the expansion is unlimited, or buy ag land instead that is not near any residential neighborhoods.

Response: HMP considered an alternate location for the project, and decided it was not viable for a variety of reasons. First of all, HMP does not own other land, and purchase of other land already zoned for cemetery use would be cost prohibitive because of the urban zoning (cemeteries are only allowed in land designated 'urban'). In addition, putting a cemetery on agricultural land in Mililani would be competing with land much more suitable to that intended use; agricultural lands on O'ahu still need to be preserved to accommodate agricultural production for the island.

If burial space is developed elsewhere on O'ahu to accommodate projected demand, potential impacts similar to those anticipated as a result of the Proposed Action will be expected at other sites. Support facilities (such as chapel space, administrative offices, and crematorium)

already exist at HMP, all of which would have to otherwise be constructed elsewhere. It is more efficient to capitalize on the availability of these facilities, in a location already known for its burial tradition, with easy and convenient access for the greater Honolulu area.

5. The people before us zoned this as conservation land for a reason and it should be kept that way. This zoning change is unwanted and unwarranted.

Response: We note your opposition to the Proposed Action. There is no record of the specific reasons the Petition Area was initially designated as Conservation land. It is probable that a large factor affecting its designation was that fact that the property was a large tract of open space.

The use of land is always in a state of review and must be considered across a wide variety of considerations, including the need to accommodate changing community requirements. Often times there are requirements that must be balanced against each other. HMP must go through appropriate reviews, such as this, before any change in land use designation is granted.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 22, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Thank you for providing a copy of the Hawaiian Memorial Park Cemetery Expansion Draft Environmental Impact Statement (TMK 4-5-033:001). I would like to submit the following comments in response to the DEIS.

I'd like to start by saying I disagree with the statement on pg 9-1 "The interment options and housing opportunities provided, the associated employment created, and public tax revenues generated by the project serve to counterbalance the loss of conservation land."

HMP states they are doing this development for the public good. However, other interment options are provided by other companies on Oahu, and the DEIS states that the 20 planned housing lots will only "fill a small percentage of the projected need". HMP has omitted the fact that they are doing the development for corporate profit.

**I feel it is a mistake to rezone the public's conservation land to benefit a private corporation, when no real net public benefit is gained.**

Below is a listing of several questions and comments regarding the DEIS.

- What study was used to determine the projected need for housing in the Koolau Poko region? (pg 1-16)
- Given that the land is zone in the State Conservation District, how will the development of the property meet the Hawaii State Plan Section 266-11(b) 1 "Exercise an overall conservation ethic in the use of Hawaii's natural resources.?"
- How will the planned expansion of both cemetery and residential lands meet the Hawaii State Plan Section 266-11(b) 5 "Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions.?"
- Some of the Petition Area is classified in the General and Limited Conservation Subzone. As asked by Samuel Lennuo, Administrator of the Office of Conservation and Coastal Lands, please state why this land designation is no longer applicable.
- Regarding the Discussion of 15-15-18 (6). Although the land is located next to an urban area, the land is currently designated in the General and Limited Conservation zone, and meets criteria to remain in the Conservation Zone.
- Regarding the Discussion of 15-15-18 (7). The discussion states that "the requested Boundary Amendment will prevent urbanization of other land in a different location." There is sufficient graveyard space on Oahu provided by other cemeteries, so additional cemetery land may not be needed.

Also, new housing is not required in Kaneohe. The BayView Estate development still has unsold houses and lots.

- Has there been a study on the impact of loss of 40 acres of trees on the amount of tree-based pollution-removal?
- Has there been a study on the impact on the storm-wind protection provided by the lost forest?
- Has there been a study on the effect on ambient air temperatures with a loss of 40 acres of forest?
- Has there been a study on possible impact on rainfall amounts caused by the loss of 40 acres of forest?
- How much of the petition area will be graded?

Pg 4-3 says "Most of the land within the Petition Area will be graded", and also that "approximately 56.6 acres will have been graded". This implies that there will be no kipuka, and that the archeological sites won't be protected as promised.

Are you planning to abandon the promised protected gathering areas? Are you planning to grade the historical sites?

- Pg 4-5 states "spoils from future grave sites will be used as fill material". What happens to the missing 37,000 cy before the grave sites are purchased and used?
- Pg 4-21 "Pueo could occasionally forage in the area. The O'ahu amakihi ... could possibly also occur at this site."
  - I've spoken to several residents who have seen Pueo in the area. You will find their testimony in letters submitted by area residents.
  - Isn't it a violation of the Endangered Species Act to develop this land if Pueo or Amakihi are present?
  - Should Pueo or Amakihi be present, won't development violate the Hawaii State Plan Section 266-11(b) 6.
- When will the geotechnical report and detailed topographic survey be complete?
- There are many assumptions made in the Preliminary Engineering Report (section 4.3.2), will there be a final Engineering Report produced prior to the LUC District Boundary Amendment Hearing? Will these assumptions be confirmed in the final Engineering report?
- Given that the detailed topographic survey has not been completed, will the size and locations of the proposed retention ponds change when the survey is completed?
- Is there a City, State, or Federal agency which will monitor the design, construction, and maintenance of the retention ponds?
- How will HMP protect the primary basalt aquifer and the upper aquifer of sedimentary caprock? Per the Mink & Lau study quoted, the aquifers have a medium to high vulnerability to contamination.
- Has there been a study to determine the effects of well drilling and exploratory drilling on the aquifers? If yes, please site. If no, please explain why?
- Has there been a study to determine the impact of the planned wells on Kawa Stream? If yes, please site. If no, please explain why?
- Please explain the impact on soil infiltration and groundwater recharge by the planned reduction of 40 acres of trees. It does not appear that the loss of forested area has been evaluated.
- Pg 4-12 states that "Groundwater can be influenced by turf management practices as well." "Impacts on groundwater are expected to be minimal."

Has there been a market analysis done on the need for housing?

- Regarding the Discussion of 15-15-18 (8). Much of the land has slopes exceeding 20 percent, and thus the land has been designated in the Limited Conservation district. The discussion of the Scenic and Open Space Resources (pg 3-10) states that "The proposed action will not significantly impact views of ridgelines or upper slopes of coastal headlands and mountains."
- - Will the development be visible from Kaneohe Bay?
  - Will the development be visible from Kamehameha Highway and H3?
  - Wouldn't the loss of forest be considered an impact to views?
- The Coastal Zone Management program's goal for Coastal Ecosystems will be compromised by the development.

The report "How to Reduce Pollutant Loads and Improve Water Quality in Kawa Stream" by the Environmental Planning Office states "the single largest problem for TMDL implementation appears to be excess nitrogen loads throughout the watershed... The largest source areas for these loads seem to be cemetery lands and residential areas"

How will HMP address controlling the additional runoff pollution from the development of both cemetery and residential housing?

- When will the archaeological monitoring plan be written? Due to the rich archaeological resources in the area, will the plan be completed prior to the LUC District Boundary Amendment Hearing?
- When will the cultural resource preservation plan be written? Due to the cultural sensitivity of the area, will the plan be completed prior to the LUC District Boundary Amendment Hearing?
- Pg 3-16 States that the Koolauoko Sustainable Communities Plan indicates that land "...within the current inventory of Hawaiian Memorial Park" should be within the Urban Community Boundary." In response to that phrase in the EISPN, Henry Eng's letter of February 14, 2008 requested "please revise the discussion of the Koolauoko SCP... It seems to misinterpret the phrase 'within the current inventory of Hawaiian Memorial Park', which refers to the areas available for cemetery use at the time the SCP was adopted". Per Mr. Eng's request, please do not imply that the land should be in the Urban boundary based on that statement.
- Please note that the SCP Section 3.1.3.1 states "because the mountains and coastal headlands are prominently visible from long distances and are a fundamental element of the regional identity... their visual integrity should be preserved by avoiding encroachment of land disturbances and structures on upper slopes and ridgelines." This implies that the land should be kept outside the Urban District during any SCP review/update, as the property is the northern slope of the Mahiui (Oneawa) Hills.
- SCP Section 3.1.2 reads "the open space system should consist of areas in both active and passive uses." In the discussion of Passive and Active Open Spaces, please add a phrase that the land is now an Active Open Space and that the cemetery's request would be downgrading the land to Passive Open Space.
- Page 4-1 says "The replacement of 56.6 acres... will not affect the overall climate of the immediate area."

- Page 1-4 says "The proposed action will not have an adverse direct or indirect impact on... air quality" Yet page 4-44 says "direct and indirect impacts on air quality could potentially occur due to project construction..." Will we potentially have air quality issues over the 20-year construction period?
- Will you provide air-quality monitoring during the construction period to areas adjacent to the development area?
- Is landscape screening (mentioned on pg 4-46) capable of reducing noise and odor?
- What landscape screening will you be using, and do you have a certification for the use of the landscape screening for said purposes?
- Can you do a study on the reduction in pollution removal capacity associated to the removal of the 40 acres of trees?
- How will HMP control the noise emitting from the property when people visit and camp at their loved ones' graves?
- What will the hours of construction be? Will there be any limitation on the times of construction?
- Are there any City and County or State laws which regulate construction vehicles in residential areas?
- Can the developer assure that trucks and construction vehicles will only enter and leave from the HMP main entrances, and not via the residential neighborhoods?
- Pg 5-5 states that HMP will employ 113 people. Can you please clarify that HMP will only be adding 7 additional positions to support the development and not an additional 113 people.
- Why isn't hiking considered as an Act-50 protected cultural access?
- Pg 6-16 states "the exact effect of the Proposed Action on the TMDLs for Kawa Stream is not certain." There should be a study to determine this impact. Will HMP provide a study on the impact of the development on Kawa Stream and Kaneohe Bay?
- What types of grass will be planted in the cemetery? Have these grasses been approved by the State Department of Agriculture to be safe to the surrounding environment and not be an invasive species?
- How will HMP ensure that criminals to not access residential properties from HMP's expanded property?
- Has HMP looked at a possible land swap with the State? TMK 4-5-035:002 is currently owned by the state. It is bounded by HMP, the Veterans cemetery, H-3, and the Kapaa Quarry. While this property is smaller than the petition area, more of that area will be usable, since buffers and retention ponds won't be required.
- Appendix D : Botanical Resources Assessment
  - The Archaeological Inventory Survey says that it took 62 person-days to complete, yet the Botanical Resource Assessment involved 2 fieldwork days. Are only two days sufficient for a complete Botanical Resource Assessment covering (at least) 56.6 acres?
  - How many people were involved in the Botanical Field Survey?
  - Is there a map showing the areas walked for the Botanical Field Survey?
  - What percentage of the actual petition area and what percentage of the entire TMK was surveyed?
- Appendix E: Avifaunal and Feral Mammal Field Survey
  - The Archaeological Inventory Survey says that it took 62 person-days to complete, yet the Avifaunal and Feral Mammal Field Survey involved 2



- o No evidence was provided to support that statement. Please provide evidence to support that statement.
- o Please identify and quantify the anticipated "minimal" impacts.
- o What agency oversees the specifications, construction, and ongoing safety of the planned water tank?
- Did the Preliminary Engineering Report by SSFM calculate current forested runoff volume as equal to the planned grass cemetery runoff volume?
- Will there be a study done to evaluate the flood risk of the FIRM Zone D land?
- What are the anticipated impacts when rainfall exceeds the planned 10-year 1-hour storm design specification? What will be the percentage increase in the water volume from current-state to planned developed-state?
- How frequently does a 10-year 1-hour storm occur in Kaneohe?
- Over the last 100 years, how often has there been storms exceeding the 10-year 1-hour storm occurrence in Kaneohe?
- Does HMP plan to address any of the current flood waters which their property currently emits to the surrounding neighborhood?
- When will the location and times for Laua 'e gathering be defined? Since this impacts the design of the cemetery, it should be done prior to the LUC Hearing.
- Pg 5-8 states that after grading, "this habitat will not be the thick introduced overstory of mature trees that currently provides the laua 'e with its favorable dark lush leaves." How can you protect the Laua 'e so that the Act-50-protected gathering right will not be impacted?
- Since the Biological Resource Assessment could not possibly identify all plants in the project area in two days, will you have on-site monitors during grading who will watch for endangered plants?
- The DEIS assumes that laua 'e gathering is occurring near the archeological sites. After meeting with practitioners, if laua 'e gathering is occurring in other areas, will those areas be identified and protected as Kipuka?
- Who will be monitoring for significant archaeological resources during the grading?
- Will the archaeological monitor be observing the entire grading process, or will they only be called in when the non-archaeologically-trained heavy-equipment operator identifies an archaeological resource?
- In Table 4, if an archaeological site has a recommendation of "No further work", does that mean that the site will be graded?
  - o In particular, will any of these sites be graded and developed? 4680, 4683, 4686, 6932, 6933
- How will HMP prevent people from accessing the cemetery from Lipalu Street?
- Will there be gravesites along the extended Lipalu Street?
- The comparative views of the petition area (requested by DPP), only show views where the development is not visible. Is the implication that 56.6 acre development will not be visible?
- Please include views from areas where the cemetery will be visible, along with "after images" from Kamehameha Highway, Lilipuna Road, Namoku Street, Mokulele Street, Lipalu Street, Pohai Nani
- Please include views from areas where the mausoleums will be visible, along with "after images" from Kamehameha Highway, Lilipuna Road, Namoku Street, Mokulele Street, Lipalu Street, Pohai Nani

- o And lastly, I objected to the following paragraph in the EISPN:

"In July 2007, a facilitated meeting was held to address any additional concerns related to the project."
- o Mr. Ezer responded that I "may misunderstand the purpose of an EIS Preparation Notice".
- o I fully understand the purpose of an EIS and the EISPN. I realize that the EIS process is to state the potential environmental impacts a development may have.
- o I was objecting to the USE OF THE PHRASE "address any additional concerns." I was not objecting to the outcome of the meeting, nor the EIS process.
- o I feel the phrase "address any additional concerns" implies resolution. I wanted to make it clear to the reader, that the community's concerns were not resolved at that meeting.
- How will the development affect our property values?
- How will you control mosquito population with the added ponds?
- Will the ponds contain water throughout the entire year?
- Will there be any wildlife in the ponds? Fish? Ducks?
- What fish will be in the ponds?
- Have the fish been approved by the State so that when the escape into Kawa and Kaneohe Bay, that they don't compete against local species?
- Kawa stream has an endemic O'opu. Has the endangered status of the o'opu been determined?
- If avian flu hits Hawaii, will you control the Ducks and Egret populations on the property?
- How will you ensure that people do not enter property at night? Will you have 24 hours security?
- What will the hours of park operation be?
- Are there going to be lights in the park?
- Where will the lights be placed?
- How many and where will the lights be located?
- How bright will the lights be? Will they be bright enough to shine into the existing residential area?
- What are the hours you plan to run the lights?
- How will you ensure that the park has enough money to maintain the park indefinitely?
- Will the park up-keep the archaeological sites? Tree trimming? Cutting grass?
- Any plans to restore the heiaus?
- Will people be allowed to visit the heiau?
- Where will the parking be for heiau visitors?
- How will HMP protect the archaeological sites from vandalism and theft?
- Will there be access to the heiau from the expanded park area?
- Where will people park to visit the Heiau?
- Are you going to increase your liability insurance to cover the expanded park area?

fieldwork days. Are only two days sufficient for a complete Avifaunal and Feral Mammal Field Survey covering (at least) 56.6 acres?

- o There is a spelling mistake in the title of the report.
- o How accurate does the preparer guarantee their survey results?
- o I have personally caught over 50 rats on my property (abutting the survey area). Why is it that no rats were seen on the survey?
- o The survey states that rats "undoubtedly occur on the site but were not observed. Is it not possible that other animals are present-on or visit the property, but not observed (such as Amakihi, Pueo, or the Hawaiian Hoary Bat)?
- o Were all 9 census stations operating for the entire duration of the survey? Were all 9 census stations operated for a full 48 hours?
- o What equipment and how many people were operating each census station?
- o Will there be a survey for endangered or threatened Snails or Insects?
- o When you create the Final EIS PDF, can you please enable the copy features from the PDF?

Regarding Scott Ezer's comments on my Letter dated February 3, 2008.

- o Can you please elaborate on the number and planned locations of the family mausoleums structures? Will there be 5? 50? 30,000?
- o The letter states "a large portion of the Petition Area will look similar as it does today," and refers to Figures 22 and 23 in the Draft EIS as examples. Figures 22 & 23 show the "best case" examples of view impacts - where the site is not visible. As I mentioned above, can you please include "worst case" examples. I stated in my letter that "the area is described as scrub, and I disagree with the categorization of the area's vegetation as scrub. The area is covered by lush, thick forest with many tall old-growth trees".

Mr. Ezer responded that the trees are not "old-growth". Stating that "old-growth" means the forest must be comprised of native plants.

The point I was making is that the EISPN's use of the term scrub is misleading as scrub means "low trees or shrubs". To use a phrase from the DEIS (page 5-8), the area is covered by a "thick introduced overstory of mature trees". Clearly, this area is not "scrub".

- o I stated that the "mausoleums will be extremely visible from much of Kaneohe and the surrounding neighborhoods."

Mr. Ezer referred to figures 22 and 23, and sited the visual profiles on figure 24.


These figures represent the "best case" examples. Figures 22, 23, and 24, provide view protected by the relatively short buffers. They do not include the visibility from Windward City Shopping Center, from Castle High School, from Kaneohe Elementary, from H-3, from Lilipuna Road, from Kaneohe Bay, from Koa Kahiko Street, From Namoku Street, Pohai Nani, nor from Mokulele Street to name just a few.

Again, I state the mausoleums are on the elevated slopes of the mountain, and they will be visible from much of Kaneohe.

- o What is the planned grass-cutting schedule? Hours and days of being cut.
- o How is the grass cut? What brand/size lawn mower used?
- o How loud will the decibel level be in the residential neighborhood from the lawn mowing?
- o How loud will construction be (in decibels) from the residential area?
- o Will decibel level from quarry increase due to lack of foliage?
- o There's a big feral cat population in the existing cemetery, how are you going to remove/control them?
- o How will you control rodent populations?
- o Some cultures explode fireworks as part of their religious practices at a gravesite. Will you control the noise? Will they be allowed to explode fireworks? What times will it be allowed?
- o How many trash cans will be located on the expanded area?
- o How often will the trash be picked-up?
- o How will you prevent errant trash from flying out of the trash cans?
- o Where will the water faucets be located? Will they be close to the residential areas and possibly be a source of noise?
- o Where will the portable gravesite canopies be stored? Will they remain on the park grounds in open view of residents?
- o What hours will graves be dug?
- o Park has been unresponsive to neighbor complaints in past. Will this continue?
  - o For example, rubbish at end of Lipalu St.
  - o Trees cut and left on residential property on Ohaha St.
- o Lipalu is a major drainage for the area, how will road being built account for draining in the area? What will happen to the culvert that exist at Lipalu now?
- o Do the draining ponds have risk of breaking/overflowing? Will they be a dam-like structure? Will spillways be built?
- o There is a dense bird population in the forests around our neighborhood. How many birds are in the area now, and how many are anticipated to be displaced /killed?
- o Will the residential area be a gated community? If yes, where will the gate be?

Once again, thank you for allowing me the opportunity to comment on the Draft EIS. I look forward to your response.

Sincerely,

  
Grant Yoshimori  
45-464 Lipalu St  
Kaneohe, HI 96744

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert and Fee Planners

Helber Hastert & Fee  
Planners, Inc.

- What pesticides will you be using on the park?
- How much pesticides will you be using on each square foot of property?
- Did you do a wind-spray analysis of where the pesticides will spread?
- What is the impact of pesticide use on the neighborhood?
- Are the pesticides being used safe for the children in the surrounding area?
- What percentage of the pesticide used will run-off the property?
- How will pesticides be applied? Will they be "crop-dusted"?
- What is the impact to Kaneohe Bay with the additional pesticides?
- What herbicides/fungicides will you be using on the park?
- How much herbicides/fungicides will you be using on each square foot of property?
- Did you do a wind-spray analysis of where the herbicides/fungicides will spread?
- What is the impact of herbicides/fungicides use on the neighborhood?
- Are the herbicides/fungicides being used safe for the children in the surrounding area?
- What percentage of the herbicides/fungicides used will run-off the property?
- How will herbicides/fungicides be applied? Will they be "crop-dusted"?
- What is the impact to Kaneohe Bay with the additional herbicides/fungicides?
- Will there be smells from the decomposing bodies?
- How will you control bacteria and diseases from the decomposing bodies?
- Do toxic gases get emitted from decomposing bodies and grave sites? I've heard of methane fireballs rising from graves. Will this occur at HMP?
- Are the caskets used going to be free of toxins?
- What are the caskets going to be made of?
- What are the dimensions of each plot?
- How often will the park clean/remove old flowers and plants?
- How will HMP prevent grave sites from sinking as the sites do in the State Veteran's cemetery?
- Does the park have regulations about what can be left as offerings at each grave site?
- How frequently will offerings be cleaned?
- How will you control mosquito populations in the stagnant vase waters?
- Will you set time limits for individual visitations? If yes, what are the time limits?
- Will the park keep track of all visitors? Taking name, phone numbers, and destination?
- Will the park ensure that the grounds are empty at closing?
- Will you have any fire-suppression / prevention in the event of a fire?
- How will you protect the neighboring homes should a fire start on the property?
- What wind speed will the mausoleums be rated for?
- Who will maintain the roads in the residential addition?
- Where will the utilities for the residential addition be brought in from?
- Please provide a map of utility access and location.
- Will the utilities be underground or overhead?
- Will you setup an association for the residential addition?
- What are the association's planned rules?
- Do you plan on selling any rights of way to the utility companies? If yes, where will they be placed?
- Where and what utility land rights will be granted?
- During construction, will the park pay for any damages to neighboring properties?
- How often is grass cut on the park?



October 8, 2008

Grant Yoshimori  
45-464 Lipalu St  
Kāne'ohe, HI 96744

Dear Mr. Yoshimori:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 22, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I disagree with the statement on pg 9-1 "The interment options and housing opportunities provided, the associated employment created, and public tax revenues generated by the project serve to counterbalance the loss of conservation land."  
Response: We note your disagreement with the above mentioned statement found in the Draft EIS.
2. HMP states they are doing this development for the public good. However, other interment options are provided by other companies on Oahu, and the DEIS states that the 20 planned housing lots will only "fill a small percentage of the projected need". HMP has omitted the fact that they are doing the development for corporate profit.  
Response: We want to let you know that Hawaiian Memorial Park (HMP) has modified the development program for the project and will eliminate the 20-lot residential subdivision and the Lipalu Street extension that was intended to service these lots. The EIS discusses the need for the cemetery expansion in Section 1.8. The Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.
3. What study was used to determine the projected need for housing in the

Koolau Poko region? (pg 1-16)

Response: The City and County of Honolulu Department of Planning and Permitting (DPP) publishes an Annual Report on the status of land use on O'ahu every year. The February 2008 report for FY 2006 details the projected need for housing in the Ko'olau Poko region. However, this issue is now moot, see #2 above.

4. Given that the land is zone in the State Conservation District, how will the development of the property meet the Hawaii State Plan Section 266-11(b) 1 "Exercise an overall conservation ethic in the use of Hawaii's natural resources."?

Response: Section 3.3.1. discusses in detail how the project relates to the Hawaii State Plan.

5. How will the planned expansion of both cemetery and residential lands meet the Hawaii State Plan Section 266-11(b) 5 "Consider multiple uses in watershed areas, provided such uses do not detrimentally affect water quality and recharge functions."?

Response: Section 3.3.1. discusses in detail how the project relates to the Hawaii State Plan.

6. Some of the Petition Area is classified in the General and Limited Conservation Subzone. As asked by Samuel Lemmo, Administrator of the Office of Conservation and Coastal Lands, please state why this land designation is no longer applicable. Regarding the discussion of 15-15-18 (6). Although the land is located next an urban area, the land is currently designated in the General and Limited Conservation zone, and meets criteria to remain in the Conservation Zone.

Response: The Final EIS, Section 3.1.3. includes a greater detailed discussion of how the project relates to the General and Limited subzones. The majority of the Petition Area (approximately 47 acres; 83%) is located in the General subzone. The physical characteristics of the Petition Area have been described as a highly disturbed Schefflera/Java Plum Forest. Only eight percent of the plant species identified on-site are native. The property does not function as a forest reserve for recharge purposes. The property will remain predominantly in vegetated open space, which is consistent with the intent of Conservation Land. Approximately 11.4 acres will be revegetated with

appropriate native and Polynesian-introduced species and landscaping for the cemetery expansion will result in over 300 new trees. The existing significant historic sites and cultural practices will be preserved and retained.

The objective of the Limited subzone is "to limit uses where natural conditions suggest constraints on human activities" (§13-5-12 (a), HAR). Cemetery uses and residential units are not permitted in the State Conservation District; therefore a re-designation to the State Urban District by the State Land Use Commission is being sought.

Only 17% (9.6 acres) of the Petition Area is located in the Limited subzone, and 4.7 acres of this total will be located within a 9.4-acre cultural preserve area to be created for the project, and will not be changed from its existing character except for an access road. Therefore, of the total 56.5-acre Petition Area, only 4.9 acres (8.7%) are within the Limited subzone and will be converted to cemetery use under the Revised Proposed Action. The majority of the area will be open space (cemetery use), and human activity will be minimal in the steep sloped areas. The results of the Slope Stability and Rockfall Hazard performed for the EIS are discussed further in Sections 4.2 and 4.6, and the full report is attached as Appendix B. The slope stability analysis found there to be no apparent potential for hazards associated with slope stability. Most slopes in the Petition Area are less than 20%; although some land with higher slope will need to be graded in order to ensure all land within the Petition Area is stable. Most of these steeper lands will be revegetated and not used for burials, and therefore will not be areas where human activity is expected. There is a potential for hazards associated with rockfall, but these can be mitigated using available technology.

7. Regarding the discussion of 15-15-18 (7). The discussion states that "the requested Boundary Amendment will prevent urbanization of other land in a different location." There is sufficient graveyard space on Oahu provided by other cemeteries, so additional cemetery land may not be needed.

Response: A new cemetery is being considered in the Hawai'i Kai area, but it has not begun construction and the reasons surrounding this are unknown. Demand and need for burial space in Hawai'i is a very real community service, and is in fact rising. This will not go away if HMP does not expand the cemetery.

8. Also, new housing is not required in Kaneohe. The BayView Estate development still has unsold houses and lots.
9. Response: Please refer to the answer to Questions #2 and #3 above.  
Has there been a market analysis done on the need for housing?  
Response: Please refer to the answer to Question #3 above as DPP does their own analysis of the need for housing across the island. Also refer to the answer to Question #2 regarding the residential portion of the project.
10. Regarding the discussion of 15-15-18 (8). Much of the land has slopes exceeding 20 percent, and thus the land has been designated in the Limited Conservation district.  
Response: Only 17% of the Petition Area is located in the Limited subzone, and 4.7 acres of this total will be located within a newly created cultural preserve area and will not be changed from its existing character except for an access road. Therefore, of the total 56.5-acre Petition Area, only 4.9 acres (8.7%) are within the Limited subzone will be converted to cemetery use under the Revised Proposed Action. The majority of the area will be open space (cemetery use), and human activity will be minimal in the steep sloped areas. The slope stability analysis found there to be no apparent potential for hazards associated with slope stability. Most slopes in the Petition Area are less than 20%; although some land with higher slope will need to be graded in order to ensure all land within the Petition Area is stable.
11. The discussion of the Scenic and Open Space Resources (pg 3-10) states that "The proposed action will not significantly impact views of ridgelines or upper slopes of coastal headlands and mountains.. Will the development be visible from Kaneohe Bay? Will the development be visible from Kamehameha Highway and H3? Wouldn't the loss of forest be considered an impact to views?"

Response: HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. For the Cemetery Only Alternative, which is now the

- preferred alternative, the Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. The 9.4-acre cultural preserve that is now part of the Concept Plan will retain the same look as it currently has, as this area will not be altered, except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.
- Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer.
12. The Coastal Zone Management program's goal for Coastal Ecosystems will be compromised by the development.  
Response: The project's conformance with objectives of the Coastal Zone Management Program is discussed in detail in the Draft EIS, Section 3.1.5.
13. The report "How to Reduce Pollutant Loads and Improve Water Quality in Kawa Stream" by the Environmental Planning Office states "the single largest problem for TMDL implementation appears to be excess nitrogen loads throughout the watershed...The largest source areas for these loads seem to be cemetery lands and residential areas". How will HMP address controlling the additional runoff pollution from the development of both cemetery and residential housing?

Response: Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage. The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids(TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kawa Stream from the Petition Area will not

increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. The proposed project will help to improve the water quality of Kāwā Stream and ultimately Kāne one Bay. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

14. When will the archaeological monitoring plan be written? Due to the rich archaeological resources in the area, will the plan be completed prior to the LUC District Boundary Amendment Hearing?

Response: The archaeological monitoring plan will be prepared by the landowner and approved by the Department of Land and Natural Resources (DLNR) prior to any ground disturbing activities, such as grading.

15. When will the cultural resource preservation plan be written? Due to the cultural sensitivity of the area, will the plan be completed prior to the LUC District Boundary Amendment Hearing?

Response: The cultural resource preservation plan will be prepared by the landowner and approved by the DLNR prior to any ground disturbing activities, such as grading.

16. Pg 3-16 States that the Koolaupoko Sustainable Communities Plan indicates that land "within the current inventory of Hawaiian Memorial Park should be within the Urban Community Boundary." In response to that phrase in the EISPN, Henry Eng's letter of February 14, 2008 requested "please revise the discussion of the Koolaupoko SCP...It seems to misinterpret the phrase 'within the current inventory of Hawaiian Memorial Park', which refers to the areas available for cemetery use at the time the SCP was adopted". Per Mr. Eng's request, please do not imply that the land should be in the Urban boundary based on that statement.

Response: The language in the Draft EIS was changed from the original language in the EIS Preparation Notice, and does not imply that

the land should be based in the Urban Community Boundary based on that statement.

17. Please note that the SCP Section 3.1.3.1 states "because the mountains and coastal headlands are prominently visible from long distances and are a fundamental element of the regional identity... their visual integrity should be preserved by avoiding encroachment of land disturbances and structures on upper slopes and ridgelines." This implies that the land should be kept outside the Urban District during any SCP review/update, as the property is the northern slope of the Mahinui (Oneawa) Hills.

Response: As discussed in the EIS, the Petitioner understands that the Proposed Project is not in conformance with the existing Ko'olau Poko Sustainable Communities Plan (SCP), and the project will require an amendment to the Ko'olau Poko SCP. While the Ko'olau Poko SCP states that the urban growth boundaries should remain fixed through the year 2020, this SCP is only a guidance document. Mechanisms exist for requesting changes (an amendment) to any SCP, which is what the Petitioner plans to do. Also, the SCPs are mandated to be reviewed and updated every five years (Sec. 24-6.10 of Ordinance 00-47). During this update, all existing language and land use maps are open to revision.

18. SCP Section 3.1.2 reads "the open space system should consist of areas in both active and passive uses." In the discussion of Passive and Active Open Spaces, please add a phrase that the land is now an Active Open Space and that the cemetery's request would be downgrading the land to Passive Open Space.

Response: The language of the EIS will not be changed, as we believe cemetery use can be considered both active and passive open space. The current cemetery by its neighbors as a park by walkers, runners, and others for active enjoyment, as well as passive enjoyment.

19. Page 4-1 says "The replacement of 56.6 acres... will not affect the overall climate of the immediate area. Has there been a study on the impact of loss of 40 acres of trees on the amount of tree-based pollution-removal? Has there been a study on the impact on the storm-wind protection provided by the lost forest? Has there been a study on the effect on ambient air temperatures with a loss of 40 acres of forest? Has there been a study on possible impact on rainfall amounts caused

by the loss of 40 acres of forest?

Response: The effect of vegetation on climatic conditions is generally accepted. There is certainly a different ambient condition between a forest and a busy intersection in Honolulu. Some of the factors known to impact microclimate are: sunlight exposure, wind exposure, cloud cover, precipitation, vegetation type, temperature (air and soil), and moisture content (air and soil). In the circumstance of the proposed HMP expansion, portions of the terrain will be characterized by a change from a forested area dominated by introduced species to an environment characterized by turf grass and both spreading foliage of native plants and groupings of trees.

Research on impacts of land cover change from forest to grass or croplands has predominately looked at large areas of forest, and study results are inconclusive as to the exact effects on both local and global climate. While it is agreed upon that trees produce cooling in the immediate area due to evapotranspiration, it is equally known that grass or croplands produce cooler temperatures than forests due to the albedo effect. The albedo effect describes the ability of surface areas to reflect sunlight. The higher the albedo, the higher the ability to reflect sunlight, and the more likely to reduce the temperature. No exact inferences can be drawn for how the Proposed Action might change the microclimate in the immediate vicinity; the temperature could be warmer and it could in fact be cooler, or both.

The interface between the proposed project and existing residences will be tempered by the retention of a generous vegetative buffer of at least 50 feet. This will provide a wind break and shade as well as a visual buffer for HMP neighbors. It is doubtful there will be appreciable change in microclimate for area residents.

20. How much of the petition area will be graded? Pg 4-3 says "Most of the land within the Petition Area will be graded", and also that "approximately 56.6 acres will have been graded". This implies that there will be no kipuka, and that the archeological sites won't be protected as promised. Are you planning to abandon the promised protected gathering areas? Are you planning to grade the historical sites?

Response: The project development program has been modified to create a 9.4-acre cultural preserve east of Kawa'ewa e Heiau which will

include five archaeological sites and large areas where the *laua'e* fern is found to provide future supply for those who gather this plant. In this regard, the highest concentration of sites will remain intact, in its "natural" state except for a modest access road. The language of the Final EIS has been changed to clarify the amount of land to be graded; 47.0 acres will be graded.

21. Pg 4-5 states "spoils from fixture grave sites will be used as fill material". What happens to the missing 37,000 cy before the grave sites are purchased and used?

Response: Each phase of expansion will have carefully engineered designs for incorporation of ongoing grave dirt generation into the expansion areas. This will eliminate the cost and energy use of offsite trucking.

22. Pg 4-21 "Pueo could occasionally forage in the area. The O'ahu amakihī . . . could possibly also occur at this site." I've spoken to several residents who have seen Pueo in the area. Isn't it a violation of the Endangered Species Act to develop this land if Pueo or Amakihī are present? Should Pueo or Amakihī be present, won't development violate the Hawaii State Plan Section 266-11(b) 6.

Response: According to the avifaunal and feral mammal survey prepared for the project, Pueo are known to forage in grasslands and agriculture fields, similar to HMP. They will still be able to forage. The O'ahu 'Amakihī is not endangered. There is an abundance of non-native habitat in the lands surrounding the Petition Area, far more habitat than the few Pueo that still exist on O'ahu would require.

23. When will the geotechnical report and detailed topographic survey be complete?

Response: The geotechnical report and detailed topographic survey will be available prior to approval of grading permits.

24. There are many assumptions made in the Preliminary Engineering Report (section 4.3.2), will there be a final Engineering Report produced prior to the LUC District Boundary Amendment Hearing? Will these assumptions be confirmed in the final Engineering report?

Response: The Final Engineering Report will be completed at the time

of submittal of grading and National Pollutant Discharge Elimination System permits, and all assumptions will be confirmed within the final report.

25. Given that the detailed topographic survey has not been completed, will the size and locations of the proposed retention ponds change when the survey is completed?

Response: First, the approach to stormwater control will utilize retention areas, not retention ponds. It is possible that some general characteristics of the retention areas might change after completion of a detailed topographic survey. However, the overall total volume of the retention areas must remain at or near present size in order to accommodate anticipated storm events. Final design must be approved by the DPP.

26. Is there a City, State, or Federal agency which will monitor the design, construction, and maintenance of the retention ponds?

Response: The City and County of Honolulu DPP, Civil Engineering Branch will monitor the design, construction, and maintenance of the retention areas.

27. How will HMP protect the primary basalt aquifer and the upper aquifer of sedimentary caprock? Per the Mink & Lau study quoted, the aquifers have a medium to high vulnerability to contamination.

Response: The existing and proposed areas of HMP are located below the Underground Injection Control line established by the Board of Water Supply. The groundwater beneath the project site is not used as a source of drinking water by the BWS, nor is it intended to be used for that purpose by the BWS.

28. Has there been a study to determine the effects of well drilling and exploratory drilling on the aquifers? If yes, please site. If no, please explain why?

Response: As stated in the Draft EIS, the Petitioner must obtain a permit from the Commission on Water Resources Management (CWRM), which is administratively assigned to DLNR, in order to drill and use an on-site well for irrigation purposes.

29. Has there been a study to determine the impact of the planned wells on Kawa Stream? If yes, please site. If no, please explain why?

Response: Groundwater resources are regulated by the CWRM. The CWRM establishes sustainable yield amounts for each aquifer system. The CWRM also regulate special areas designated as water management areas. Any withdrawals in water management areas must be justified to obtain a use permit from the CWRM, as stated in §13-171-11 HAR. According to CWRM's comment letter on the Draft EIS, CWRM does "not anticipate any impacts to the quantity of ground and surface water flows."

30. Please explain the impact on soil infiltration and groundwater recharge by the planned reduction of 40 acres of trees. It does not appear that the loss of forested area has been evaluated.

Response: Of the 56.5 acres, approximately 91.5% (51.7 acres) will continue to be pervious surfaces. The proposed project will include revegetation with appropriate native and indigenous species, with over 300 new trees planted. Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu DPP's Rules Relating to Storm Drainage Standards of January 2000.

31. Pg 4-12 states that "Groundwater can be influenced by turf management practices as well." "Impacts on groundwater are expected to be minimal". No evidence was provided to support that statement. Please provide evidence to support that statement. Please identify and quantify the anticipated "minimal" impacts.

Response: HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified Pest Control Advisor (PCA) would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.



The turf areas are treated with slow release turf fertilizers twice a year, in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils. Impacts on groundwater are expected to be minimal. HMP will work to ensure groundwater impacts are minimized. HMP will maintain fertilizer maintenance logs as part of a fertilizer management plan. In addition, soil or tissue samples (grass) will be submitted to University of Hawaii's Agricultural Diagnostic Service Center to test if fertilizer is necessary before the semi-annual fertilizer application.

32. What agency oversees the specifications, construction, and ongoing safety of the planned water tank?
- Response: The Honolulu Board of Water Supply oversees the details of water storage tanks. The project will no longer have a water tank.
32. Did the Preliminary Engineering Report by SSFM calculate current forested runoff volume as equal to the planned grass cemetery runoff volume?
- Response: Please refer to the answer to Question # 30 above for discussion of runoff coefficients.
33. Will there be a study done to evaluate the flood risk of the FIRM Zone D land?
- Response: A complete drainage evaluation and report must be completed and approved by DPP prior to the approval of a final grading plan. We are not aware of a study to be done to evaluate the flood risk of FIRM Zone D land.
34. What are the anticipated impacts when rainfall exceeds the planned 10-year 1-hour storm design specification? What will be the percentage increase in the water volume from current-state to planned developed-state?
- Response: The retention areas have been sized to capture the increased runoff as a result of the proposed development based on the regulatory requirements for all development on Oahu. If a storm event

exceeds the capacity of the retention areas, the runoff would overflow its bank and sheet flow onto the project site.

The City and County of Honolulu DPP Rules Relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

35. How frequently does a 10-year 1-hour storm occur in Kaneohe? Over the last 100 years, how often has there been storms exceeding the 10-year 1-hour storm occurrence in Kaneohe?
- Response: By definition, the 10-year 1-hour storm has a probability of occurrence of 10% in any given year. Data on storms can be obtained through NOAA's National Climatic Data Center, among other sources.
36. Does HMP plan to address any of the current flood waters which their property currently emits to the surrounding neighborhood?
- Response: First of all, we want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. It is important to understand the physical characteristics that could be influencing these events. The Pikoioa Tract 10 subdivision was approved by the City and County of Honolulu in 1964. As part of the subdivision, the vast majority of parcels along the eastern sides of Nāmoku and Ōhāhā Streets are encumbered by an easement for slope and drainage purposes (shown on Figure 18 of the EIS). These parcels typically are level from the front property line toward the rear of the property, rendering from 1/3 to 1/2 of the property unbuildable because of the slope and the easement, even though the property is zoned for residential use.
- The drainage system for these properties was designed as a series of interceptor ditches cut into the slope. These ditches were lined with concrete and extend across all parcels in this system, intending to direct sheet flow to underground storm drains, which eventually empty into Kāwā Stream. The responsibility to maintain these interceptor ditches was left to each individual property owner. As a consequence, there is a wide range of maintenance quality. Inspection of several homes indicated some owners keep their interceptor ditches free of silt, debris, and vegetation. Other property owners have not kept a maintenance

protocol, and ditches are overgrown with trees, shrubs, and other vegetation, and are full of soil, incapable of performing their designed function. It is probable there are several factors contributing to flooding occurrences in this neighborhood: (1) slope profile characteristics of each property; (2) design of the interceptor ditch system; (3) uneven maintenance protocol for the entire system

The City and County of Honolulu DPP Rules Relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

37. When will the location and times for *laua'e* gathering be defined? Since this impacts the design of the cemetery, it should be done prior to the LUC Hearing. Pg 5-8 states that after grading, "this habitat will not be the thick introduced overstory of mature trees that currently provides the *laua'e* with its favorable dark lush leaves." How can you protect the *laua'e* so that the Act 50-protected gathering right will not be impacted?

Response: HMP is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point in time, HMP has been unsuccessful with attempts to have groups come forward and identify where they are gathering *laua'e*. The locations of the *laua'e* communities were identified during additional field work for the EIS in an addendum to the Botanical Survey prepared for this project. As discussed in the answer to Question #11, we have revised the project Proposed Action and EIS to incorporate a cultural preserve area that will include areas where *laua'e* is plentiful.

38. Since the Biological Resource Assessment could not possibly identify all plants in the project area in two days, will you have on-site monitors during grading who will watch for endangered plants?

Response: The Botanical Survey followed appropriate methodological protocols, and we are confident that the survey adequately covers botanical resources. The survey even covered areas outside the Petition Area. Not surprisingly, very few native species were recorded, due to the previous disturbance of the property and the presence of an introduced second growth forest.

39. The DEIS assumes that *laua'e* gathering is occurring near the archeological sites. After meeting with practitioners, if *laua'e* gathering

is occurring in other areas, will those areas be identified and protected as *Kipuka*?

Response: Please see response to Questions # 11 and 37.

40. Who will be monitoring for significant archaeological resources during the grading? Will the archaeological monitor be observing the entire grading process, or will they only be called in when the non-archaeologically-trained heavy-equipment operator identifies an archaeological resource?

Response: A professional archaeologist will monitor. The specifics of the monitoring protocol will be included in the monitoring plan to be approved by SHPD prior to earth disturbing activities.

41. In Table 4, if an archaeological site has a recommendation of "No further work", does that mean that the site will be graded? In particular, will any of these sites be graded and developed? (4680, 4683, 4686, 6932, 6933)

Response: No further work means that all relevant information has been obtained from the site, and no additional work is necessary. If the recommendation is accepted by the DLNR, State Historic Preservation Division, the site area can be developed. Sites 4683, 4684, 6930, 6932, and 6933 will be included within the 9.4-acre cultural preserve, which will remain in its "natural" state except for a modest access road. Sites 4680 and 4686 will be incorporated into the cemetery expansion area.

A comment letter from SHPD relating to the AIS was received on September 22, 2008. The recommendation of the agency included four main points: (1) preservation of sites 354, 4684, 6932, and 6931 as a complex, not individually; (2) no relocation of the grinding stone; (3) consultation with ethnic organizations or members of a group for whom some of the historic properties may have significance, as well as with OHA; and (4) appropriate additional testing of the area to be developed as determined via communication with SHPD. All of the recommendations of SHPD will be followed, and the AIS will be revised accordingly. Since the project will include a 9.4-acre cultural preserve, the sites of concern will be protected as a complex, including leaving the grinding stone in place. Further consultation will occur with OHA

and members of a group or organizations for whom the area has significance, and additional testing will be done as required by SHPD.

42. How will HMP prevent people from accessing the cemetery from Lipalu Street? Will there be gravesites along the extended Lipalu Street?

Response: HMP is very concerned about proper security within the cemetery for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours. The areas of the cemetery can be found in Figure 4a of the Final EIS, Alternative III Concept Plan, the preferred alternative.

43. The comparative views of the petition area (requested by DPP), only show views where the development is not visible. Is the implication that 56.6 acre development will not be visible? Please include views from areas where the cemetery will be visible, along with "after images" from Kamehameha Highway, Liliupuna Road, Namoku Street, Mokulele Street, Lipalu Street, Pohai Nani. Please include views from areas where the mausoleums will be visible, along with "after images" from Kamehameha Highway, Lipuna Road, Namoku Street, Mokulele Street, Lipalu Street, Pohai Nani.

Response: The visual analysis section of the EIS has been expanded by adding several before and after images taken from near and far. Please refer to the answer to Question #11 above.

44. Page 1-4 says "The proposed action will not have an adverse direct or indirect impact on... air quality" yet page 4-44 says "direct and indirect impacts on air quality could potentially occur due to project construction...". Will we potentially have air quality issues over the 20-year construction period?

Response: First, we would like to clear up a popular misconception by clarifying that the expansion of the cemetery will not occur continuously over 20 years. Instead, there will be three construction phases, each lasting 6+ months. Hawai'i enjoys some of the best air quality within the United States (except areas exposed to the pollutants associated with the on-going volcanic episode on the Big Island). In September 2008,

an air quality analysis was conducted for the project, and found that factors favoring good air quality include the vicinity of the Petition Area to good exposure to tradewinds, and ample open space. Additional information from the air quality study has been included in Section 4.11.

45. Will you provide air-quality monitoring during the construction period to areas adjacent to the development area?

Response: No air quality monitoring is proposed.

46. Is landscape screening (mentioned on pg 4-46) capable of reducing noise and odor? What landscape screening will you be using, and do you have a certification for the use of the landscape screening for said purposes?

Response: Yes, landscape screening is capable of screening noise and odor. Although, it is difficult to imagine how the cemetery would produce offensive odors. No certification is required.

47. Can you do a study on the reduction in pollution removal capacity associated to the removal of the 40 acres of trees?

Response: We did prepare new analysis of the projects impact on the contribution of Total Maximum Daily Load (TMDL) allocations for Kāwā Stream. Prepared by Element Environmental, the report will be attached to the Final EIS as Appendix L. This study indicated that pollutant levels in Kāwā Stream would be reduced by the performance of the retention areas. We should also remind you that over, 91.5% of the Petition Area will remain as impervious surfaces.

48. How will HMP control the noise emitting from the property when people visit and camp at their loved ones' graves?

Response: The act of visitation at grave sites is ordinarily a solemn, quiet experience; in our experience, people do not "camp" at grave sites.

49. What will the hours of construction be? Will there be any limitation on the times of construction? Are there any City and County or State laws which regulate construction vehicles in residential areas? Can the developer assure that trucks and construction vehicles will only enter and leave from the HMP main entrances, and not via the residential

neighborhoods?

Response: This is controlled by Chapter 46, Hawaii Administrative Rules, Community Noise Control. Construction hours will be appropriate, Monday through Friday from 7am to 3pm.

50. Pg 5-5 states that HMP will employ 113 people. Can you please clarify that HMP will only be adding 7 additional positions to support the development and not an additional 113 people.

Response: The text in Section 5.3.2, Employment of the EIS states that 3-5 new full time equivalent jobs will be added in the maintenance sector of the cemetery. Section 5.4, Fiscal Impacts, has been expanded to clarify the number of new positions related to the project.

51. Why isn't hiking considered as an Act-50 protected cultural access?

Response: Trails were considered in the CIA performed for the project. Trail access to the Kawa'ewae Heiau and *laua'e* gathering will be considered and protected as part of the Proposed Action. As a recreation activity, hiking is not part of Act 50, which considers cultural trials. In addition, we have consulted with the DLNR Na Ala Hele Trail program, and as a result we are not aware of any ancient trails within the Petition Area.

52. Pg 6-16 states "the exact effect of the Proposed Action on the TMDLs for Kawa Stream is not certain." There should be a study to determine this impact. Will HMP provide a study on the impact of the development on Kawa Stream and Kaneohe Bay?

Response: Please refer to the answer to Question #13 above for discussion of the retention areas and the improvements to water quality that will come from them.

53. What types of grass will be planted in the cemetery? Have these grasses been approved by the State Department of Agriculture to be save to the surrounding environment and not be a invasive species?

Response: There are a variety of turf grasses locally available and suitable for use in the cemetery (bermuda, zoysia, etc.).

54. How will HMP ensure that criminals to not access residential properties

from HMP's expanded property?

Response: Please refer to the answer to Question #41.

55. Has HMP looked at a possible land swap with the State? TMK 4-5-035:002 is currently owned by the state. It is bounded by HMP, the Veterans cemetery, H-3, and the Kapaa Quarry. While this property is smaller than the petition area, more of that area will be usable, since buffers and retention ponds won't be required.

Response: Actually, this land was previously owned by HMP and was deeded to the State in order for the Hawaii Veterans Cemetery to reach minimum acreage for federal standards. No land exchange is contemplated. Also, this land is located within the State Conservation District and offers the same entitlement requirements as the Petition Area.

56. Appendix D: Botanical Resources Assessment. The Archaeological Inventory Survey says that it took 62 person-days to complete, yet the Botanical Resource Assessment involved 2 fieldwork days. Are only two days sufficient for a complete Botanical Resource Assessment covering (at least) 56.6 acres? How many people were involved in the Botanical Field Survey? Is there a map showing the areas walked for the Botanical Field Survey? What percentage of the actual petition area and what percentage of the entire TMK was surveyed?

Response: The Botanical Survey followed appropriate and accepted methodological protocols, and we are confident that the survey adequately covers botanical resources. The survey looked at the entire Petition Area, and some areas surrounding it as well.

57. Appendix E: Avifaunal and Feral Mammal Field Survey. The Archaeological Inventory Survey says that it took 62 person-days to complete, yet the Avifaunal and Feral Mammal Field Survey involved 2 fieldwork days. Are only two days sufficient for a complete Avifaunal and Feral Mammal Field Survey covering (at least) 56.6 acres?

Response: The Avifaunal and Feral Mammal Field Survey followed appropriate and accepted methodological protocols, and we are confident that the survey adequately covers fauna resources.

58. There is a spelling mistake in the title of the report.

Response: The spelling of the word 'Avifaunal' in the title of the report has been changed in the Final EIS.

59. How accurate does the preparer guarantee their survey results? I have personally caught over 50 rats on my property (abutting the survey area). Why is it that no rats were seen on the survey? The survey states that rats "undoubtedly occur on the site but were not observed." Is it not possible that other animals are present-on or visit the property, but not observed (such as Amakahi, Pueo, or the Hawaiian Hoary Bat)?

Response: It is possible that other animals are present that weren't observed. The predominant habitat is second-growth forest with non-native species, which is not conducive to supporting native wildlife.

60. Were all 9 census stations operating for the entire duration of the survey? Were all 9 census stations operated for a full 48 hours? What equipment and how many people were operating each census station?

Response: The census stations were eight minute count stations where an eight minute count of all birds seen or heard at that station were tallied. These stations were sampled twice on each of the survey days. Sampling took place during early morning hours and late afternoon hours when birds are actively singing/calling and foraging.

61. Will there be a survey for endangered or threatened snails or insects?

Response: A survey of native invertebrate resources for the Petition Area was conducted by Steven Lee Montgomery, Ph.D., in August 2008, and language has been added to the Section 4.8: Fauna of the EIS that discusses snails and insects.

62. When you create the Final EIS PDF, can you please enable the copy features from the PDF?

Response: Chapter 343, Hawaii's Revised Statutes (HRS), does not require this, and we will not be enabling the copy features on the pdf of the Final EIS.

63. Regarding Scott Ezer's comments on my letter dated February 3, 2008. Can you please elaborate on the number and planned locations of the family mausoleums structures? Will there be 57,507 30,000?

Response: HMP does not know how many family mausolea may be requested by families in the future. HMP believes the demand will be similar to what has happened in the past years. They will be generally located in landscaped areas with a variety of shrub and small tree plantings so that they slip into the fabric of the cemetery somewhat seamlessly.

64. The letter states "a large portion of the Petition Area will look similar as it does today" and refers to Figures 22 and 23 in the Draft EIS as examples. Figures 22 & 23 show the "best case" examples of view impacts — where the site is not visible. As I mentioned above, can you please include "worst case" examples.

Response: Please refer to the answer to Question #11 above.

65. I stated in my letter that "the area is described as scrub, and I disagree with the categorization of the area's vegetation as scrub. The area is covered by lush, thick forest with many tall old-growth trees". Mr Ezer responded that the trees are not "old-growth". Stating that "old-growth" means the forest must be comprised of native plants. The point I was making is that the EISPN's use of the term scrub is misleading as scrub means "low trees or shrubs". To use a phrase from the DEIS (page 5-8), the area is covered by a "thick introduced overstory of mature trees". Clearly, this area is not "scrub".

Response: We stand by the terminology provided in the Botanical Resources Assessment and described in the Draft EIS for the flora of the Petition Area.

66. I stated that the "mausoleums will be extremely visible from much of Kaneohe and the surrounding neighborhoods." Mr. Ezer referred to figures 22 and 23, and sited the visual profiles on figure 24. These figures represent the "best case" examples. Figures 22, 23, and 24, provide view protected by the relatively short buffers. They do not include the visibility from Windward City Shopping Center, from Castle High School, from Kaneohe Elementary, from H-3, from Lilipuna Road, from Kaneohe Bay, from Koa Kahiko Street, From Namoku Street, Pohai Nani, nor from Mokulele Street to name just a few. Again, I state the mausoleums are on the elevated slopes of the mountain, and they will be visible from much of Kaneohe.

Response: Please refer to the answer to Question #11 above.

67. I objected to the following paragraph in the EISP: "In July 2007, a facilitated meeting was held to address any additional concerns related to the project. Mr. Ezer responded that I "may misunderstand the purpose of an EIS Preparation Notice". I fully understand the purpose of an EIS and the EISP. I realize that the EIS process is to state the potential environmental impacts a development may have. I was objecting to the USE OF THE PHRASE "address any additional concerns." I was not objecting to the outcome of the meeting, nor the EIS process. I feel the phrase "address any additional concerns" implies resolution. I wanted to make it clear to the reader, that the community's concerns were not resolved at that meeting.

Response: We note your comment.

68. How will the development affect our property values?

Response: The project is not expected to affect property values in the surrounding neighborhood. Cemeteries are excellent neighbors due to the hours of operation and the beautiful quiet setting and nature of the use. Many very high value residential neighborhoods are located adjacent to cemeteries throughout the country. There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community and people have accepted them as neighbors. This is also the case for HMP. In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. On average, property values and home sale prices are not any lower for the Parkview neighborhood than for the Pikoioa neighborhood.

Additionally, some studies that examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price.

69. How will you control mosquito population with the added ponds? Will the ponds contain water throughout the entire year? Will there be any wildlife in the ponds? Fish? Ducks? What fish will be in the ponds? Have the fish been approved by the State so that when the escape into Kawa and Kaneohe Bay, that they don't compete against local species?

Response: Retention areas are not permanent ponds or dams of water, and must be reviewed as part of the project grading and drainage plan, and approved by DPP. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters, and includes a wide variety of individual design techniques that can be used in appropriate circumstances. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. Properly designed and maintained retention areas are not suitable habitat for mosquitoes.

Exact design criteria for the retention areas and appropriate substrate treatment will be determined after percolation tests are done on the soils. Proper design for retention areas ensures that water does not remain longer than three days; mosquitoes cannot complete a breeding cycle in this short of a time period. The project will include a Drainage Maintenance Plan that spells out the monitoring and maintenance protocol for the retention areas. Overall, the maintenance measures undertaken to meet water quality goals will also act to ensure these retention areas do not become mosquito breeding habitats.

No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

There are not expected to be any fish, ducks, or other animals living in the retention areas.

70. Kawa stream has an endemic O'opu. Has the endangered status of the o'opu been determined?

Response: The O'opu is not currently an endangered or threatened species.

71. If avian flu hits Hawaii, will you control the Ducks and Egret populations on the property?

Response: While we appreciate the serious nature of controlling avian flu if it hits Hawaii, this is considered to be outside the scope of the project.

72. How will you ensure that people do not enter property at night? Will you

have 24 hours security?

Response: Please refer to the answer to Question #42 above for discussion of the security measures to be employed.

73. What will the hours of park operation be? Are there going to be lights in the park? How many and where will the lights be located? How bright will the lights be? Will they be bright enough to shine into the existing residential area? What are the hours you plan to run the lights?

Response: HMP is open dawn to dusk. Since the park closes at dusk, the only lighting that would be considered for the expansion area would be for limited security lighting. If utilized, this will be shielded to control light spill.

74. How will you ensure that the park has enough money to maintain the park indefinitely?

Response: Through the State regulated Endowment Care Fund for HMP, long term maintenance of all cemetery grounds and facilities will be carried out in perpetuity. This is an important part of HMP's promise to all of its families.

75. Will the park up-keep the archaeological sites? Tree trimming? Cutting grass?

Response: Upkeep of the Kawa'ewa'e Heiau will continue to be undertaken by caretaker groups; those archaeological sites that have been deemed significant will be preserved in accordance with the approved Archaeological Preservation Plan. HMP will trim trees and cut grass.

76. Any plans to restore the heiaus? Will people be allowed to visit the heiau? Where will the parking be for heiau visitors? How will HMP protect the archaeological sites from vandalism and theft? Will there be access to the heiau from the expanded park area? Where will people park to visit the Heiau?

Response: Presently there are no plans by HMP or any other entity to restore Kawa'ewa'e Heiau. HMP plans to preserve the Heiau and other sites that exist within and near the Petition Area. At this time, Kawa'ewa'e Heiau is the only known heiau in the area. We believe

Sites 6930 and 6931 are ceremonial but have no definitive evidence they were heiau. Subsequent to land use approvals, we are required to prepare an Archaeological Preservation Plan. All of the issues related to access, buffer zones, and parking will be dealt with in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, this plan must be approved by SHPD.

77. Are you going to increase your liability insurance to cover the expanded park area?

Response: Liability insurance will not need to be purchased by users or groups coming onto the property. Further, per §520-4, HRS, HMP is not liable or responsible for any person who uses its property for recreational purposes, "which includes but is not limited to any of the following, or any combination thereof: hunting..... picnicking, hiking, pleasure driving, nature study... and viewing or enjoying historical, archaeological, scenic, or scientific sites" (§520-2, HRS).

78. What pesticides will you be using on the park? How much pesticides will you be using on each square foot of property? Did you do a wind-spray analysis of where the pesticides will spread? What is the impact of pesticide use on the neighborhood? Are the pesticides being used safe for the children in the surrounding area? What percentage of the pesticide used will run-off the property? How will pesticides be applied? Will they be "crop-dusted"? What is the impact to Kaneohe Bay with the additional pesticides?

Response: Please refer to the answer to Question #31 above.

79. What herbicides/fungicides will you be using on the park? How much herbicides/fungicides will you be using on each square foot of property? Did you do a wind-spray analysis of where the herbicides/fungicides will spread? What is the impact of herbicides/fungicides use on the neighborhood? Are the herbicides/fungicides being used safe for the children in the surrounding area? What percentage of the herbicides/fungicides used will run-off the property? How will herbicides/fungicides be applied? Will they be "crop-dusted"? What is the impact to Kaneohe Bay with the additional herbicides/fungicides?

Response: HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Herbicides/fungicides are

not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. If an extraordinary situation should occur, a certified PCA would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach.

80. Will there be smells from the decomposing bodies? How will you control bacteria and diseases from the decomposing bodies? Do toxic gases get emitted from decomposing bodies and grave sites? I've heard of methane fireballs rising from graves. Will this occur at HMP?

Response: Cemeteries were originally developed to eliminate the health issues previously associated with uncontrolled burial practices. There is no evidence that modern cemeteries and the very carefully controlled preparation of human remains and placement in caskets and then in sealed concrete outer burial containers or vaults and mausoleum crypts poses any public health concerns including concerns about diseases, dangerous bacteria, or toxic gases.

81. Are the caskets used going to be free of toxins? What are the caskets going to be made of?

Response: Caskets are constructed of the very same material and in the same quantities as everyday home and office furniture. Caskets are placed in sealed concrete outer burial containers or vaults and in above ground concrete crypts. It can be reasonably argued that caskets pose far less potential threat to the environment than the everyday disposal of home and office furniture.

82. What are the dimensions of each plot?

Response: The typical land burial lot ranges from 8 to 10 feet long and 36 to 48 inches wide.

83. How often will the park clean/remove old flowers and plants? Does the park have regulations about what can be left as offerings at each grave site? How frequently will offerings be cleaned? How will you control mosquito populations in the stagnant vase waters?

Response: Flowers are removed when they are presumed dead. Some religious practice does allow certain offerings of food. Out of respect it is left for a reasonable timeframe. This is very common in

Hawai'i and culturally accepted.

84. How will HMP prevent grave sites from sinking as the sites do in the State Veteran's cemetery?

Response: The ground-subside problems that have occurred at the Veteran's Cemetery have not occurred at HMP. There could be a variety of reasons why this is happening, but our investigations did not cover this and we do not anticipate any problems.

85. Will you set time limits for individual visitations? If yes, what are the time limits? Will the park ensure that the grounds are empty at closing? Will the park keep track of all visitors? Taking name, phone numbers, and destination?

Response: There are no time limits for visitation of burial sites. Visitors are not required to check in when present. Security personnel do sweep the grounds to ensure that no unauthorized individuals are present at closing.

86. Will you have any fire-suppression/prevention in the event of a fire? How will you protect the neighboring homes should a fire start on the property?

Response: We will have fire hydrants as required by the Fire Department, which will be approved when final plans are submitted to City agencies for review.

87. What wind speed will the mausoleums be rated for?

Response: The mausoleums will comply with all requirements of the building code administered by the DPP, including requirements related to hurricane-proofing of buildings.

88. Who will maintain the roads in the residential addition?

Response: There will be no residential portion of the project and therefore no roads in the residential addition.

89. Where will the utilities for the residential addition be brought in from? Will the utilities be underground or overhead? Please provide a map of utility access and location.



Response: There will be no residential portion of the project and therefore no utilities for the residential addition.

90. Will you setup an association for the residential addition? What are the association's planned rules?

Response: There will be no residential portion of the project and therefore no association for the residential addition.

91. Do you plan on selling any rights of way to the utility companies? If yes, where will they be placed? and what utility land rights will be granted?

Response: HMP does not have any plans to sell rights of way to utility companies.

92. During construction, will the park pay for any damages to neighboring properties?

Response: HMP will require appropriate insurance and indemnifications from contractors doing work within the park for purposes of protecting HMP and adjacent residents, property owners, and public agencies.

93. How often is grass cut on the park? What is the planned grass-cutting schedule? Hours and days of being cut. How is the grass cut? What brand/size lawn mower used? How loud will the decibel level be in the residential neighborhood from the lawn mowing?

Response: Grass cutting is ongoing, every day, all day, and performed garden by garden as needed. Cutting is accomplished by using a lawn mower and a weed whacker Xmar 60". The noise level is acceptable for commercial purposes. It is important to understand HMP has been operating and maintaining this cemetery for 50 years.

94. How loud will construction be (in decibels) from the residential area?

Response: A noise review for the Proposed Action was conducted in 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS.

95. Will decibel level from quarry increase due to lack of foliage?

Response: Please refer to answer to Question #94.

96. There's a big feral cat population in the exiting cemetery, how are you going to remove/control them?

Response: In addition to helping to educate the community about the problems created by improper release of pet animals to the wild, HMP is considering two humane methods for controlling feral cat populations: a Trap Neuter and Return (TNR) program, or trapping them and taking them to the humane society. Because communities have experienced an increase in rodents after removal of feral cats, HMP will most likely participate in the TNR program.

97. How will you control rodent populations?

Response: HMP is not aware of a problem with rodents. See answer to Question #96 above.

98. Some cultures explode fireworks as part of their religious practices at a gravesite. Will you control the noise? Will they be allowed to explode fireworks? What times will it be allowed?

Response: HMP honors and respects all religions and their practices subject to State laws governing any specific activities. The cemetery would only perform services during normal business hours. The religious practices and ceremonies have been performed at the cemetery since 1959.

99. How many trash cans will be located on the expanded area? How often will the trash be picked-up? How will you prevent errant trash from flying out of the trash cans?

Response: The number of waste receptacles will be initially based on the quantity throughout the existing Oceanview Garden. HMP will add additional waste receptacles if needed. HMP has a significant vested interest in having a neat and clean cemetery. Trash is picked up daily.

100. Where will the water faucets be located? Will they be close to the residential areas and possibly be a source of noise?

Response: Water faucets will be scattered throughout the cemetery. Ordinarily, they are located close to the roadways. Activities associated

with filling flower vases with water do not generate excessive noise.

101. Where will the portable gravesite canopies be stored? Will they remain on the park grounds in open view of residents?

Response: The most appropriate storage facility will be determined later, however they will be located in a safe area, out of the way of normal operation. When not in use, all portables canopies will be placed out of view from offsite residents.

102. What hours will graves be dug?

Response: Graves will be dug during normal business hours, generally 7:30 am to 4:30 pm.

103. Park has been unresponsive to neighbor complaints in past. Will this continue? For example, rubbish at end of Lipalu St. Trees cut and left on residential property on Ohaha St.

Response: While this may have been a problem in the past, HMP is not aware of any of the other items mentioned in your letter occurring at this time. In the future, if you have any concerns regarding HMP as a neighbor, we urge you to contact Mr. Jay Morford by telephone at 808.522.5233.

104. Lipalu is a major drainage for the area, how will road being built account for draining in the area? What will happen to the culvert that exist at Lipalu now?

Response: Since there will be no residential portion of the project, there will not be a road built at Lipalu Street. The culvert that exists at Lipalu Street will remain as it currently is.

105. Do the draining ponds have risk of breaking/overflowing? Will they be a dam-like structure? Will spillways be built?

Response: Please refer to the response to Question #69, as retention areas are not permanent ponds or dams of water.

106. There is a dense bird population in the forests around our neighborhood. How many birds are in the area now, and how many are anticipated to be displaced / killed?

Response: A percentage of birds will be displaced, but this will not happen all at once as the project will occur in phases. Also, to replace the non-native forest, the project plans a replacement of over 300 trees, and the creation of the 9.4-acre cultural preserve will retain additional intact land area.

107. Will the residential area be a gated community? If yes, where will the gate be?

Response: As noted several times above in answers to other questions, there will be no residential portion of the project and therefore no gate.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



HAWAII STATE LEGISLATURE  
STATE CAPITOL  
HONOLULU, HAWAII 96813

July 22, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

As the legislators representing the Pikoiloa community, we remain opposed to Hawaiian Memorial Park's (HMP) proposed expansion and the development of residential units. From the very beginning our concerns have included, but not been limited to, the grading and deforestation of conservation land; the potential threat to life and property as a result of landslides and erosion; and the encroachment upon significant cultural areas, specifically Kāwa'ewa'e Heiau, which is on the National Register of Historic Places.

While we still have these concerns, having reviewed the Draft Environmental Impact Statement (DEIS), we have additional questions that we would like answered and the impacts on the community addressed.

**Alternatives to the Proposed Actions:**

- How serious is HMP in considering alternative 8.2, which would replace the subdivision with a residential retirement facility? Historically, there had been concerns raised over the height and size of Pōhai Nani, yet you indicate that you would build a complex with a seven story residential tower similar in size on the mountainside. Have you taken into account the impact such a structure would have on Windward O'ahu's visual and scenic resources, the impact such a large structure would have on the Kane'ōhe community, as well as potential soil and erosion concerns? What would be the projected unit and tenant count, and what impact would this have on traffic? Would this be sold as affordable senior housing units? Would there be day care services provided, and if so, what additional impact on traffic would you expect?
- How serious is HMP about alternative 8.3, which would only include an expansion of the cemetery? Given that you would still be petitioning to re-designate 56.6 acres, what assurances would the community have that you would

Jay Morford  
July 22, 2008  
Page 2 of 4

not seek to add in a residential component at a later date? You indicate that the impacts on the scenic and visual resources would be limited, yet both Pōhai Nani, the Hawai'i State Veterans Cemetery and the mountainside in between where you are proposing this expansion are highly visible from various parts of Kane'ōhe, especially from higher elevations like H-3, and the Pali and Likelike Highways. How do you reconcile that these visual resources, considered extremely important and highly valued by Windward residents and visitors alike, would not be compromised by this development?

**Irreversible and Irrecoverable Commitments of Resources:**

- You state in the DEIS that "...historic sites, both in the petition area and nearby, will be ensured to be cared for, with greater access to otherwise unknown historic sites." While your plan does incorporate marginal buffers around historic sites both inside and near your petition area (specifically Kāwa'ewa'e Heiau), it also establishes public roadways around and within this historic complex. Is it your consultants' professional opinion that these resources would be better cared for if there was public street access surrounding these historic properties, providing access to not only lineal descendants or caregivers, but any member of the general public, regardless of their intentions?
- You acknowledge the loss of conservation land, indicating that that housing opportunities, employment and tax revenue will counterbalance this. If you look at the Windward O'ahu Regional Plan, considered by many to be the inspiration for the Hawai'i State Plan, it clearly states that the preservation of conservation and agricultural areas are considered to be very important, even if it affects the existing housing stock. It went so far as to indicate that while Kane'ōhe would continue to see development, it should maintain an open space ratio of not less than 60%. How would you reconcile this further loss of conservation land and open space proposed under the project with the Windward O'ahu Regional Plan?

**Ko'olaupoko Sustainable Communities Plan (SCP):**

- You correctly state that, "...the SCP is shaped around two main concepts, including protection of the community's natural, scenic, cultural, historical and agricultural resources and systems. Key elements of the SCP's vision call for preserving and promoting open space throughout the region, and preserving and enhancing scenic, recreational, and cultural features that define Ko'olaupoko's sense of place." You claim that the project would conform to major components of the SCP. Please explain how grading a central mountainside, adding large visible structures such as mausoleums, building a residential subdivision, exposing historic sites, and removing 56.6 acres from the conservation district is in accordance with these stated goals of the SCP.

**Historic, Cultural, and Archaeological Resources:**

- While Kāwa'ewa'e Heiau has been carved out of the petition area, we remain concerned about the integrity and preservation of this historic site and others in the area. In the Cultural Impact Assessment (CIA), Mr. Earl Neller indicated that the sites that lay beyond the stone walls of the heiau may have significance to the structure. According to Neller, the current configuration of the heiau results partially from its historic use as a cattle enclosure. As a result of this, Neller suggests that the grounds of Kāwa'ewa'e Heiau may have once been larger than the rectangular enclosure that is visible today. Similar thoughts were conveyed in the CIA by Dr. Chuck Burrows and Mr. Charlie Ogata. How can we be certain that the complex as a whole is being preserved when your plan calls for each site to be preserved individually, potentially leaving historically important grounds to be developed?

**Socio-Economic Probable Impacts:**

- You indicate that the City and County of Honolulu's Department of Planning and Permitting (DPP) has indicated a need for an additional 1,020 housing units in the Kō'olaupoko region between 2010 and 2030. Please provide us with information on specifically where DPP anticipated this growth to take place in the region, and whether its projections indicate the need to convert conservation land into the urban district. Given that the SCP will be up for review later this Fall, what is the possibility that these growth projections may change and shift more towards the urban core, especially given plans for a light rail system?
- Please expound upon the extent to which the creation of four mausoleums will benefit the people of Hawai'i and the Windward community. Approximately how many niches will be created and what is the projected cost of these spaces? Will these niches and the corresponding services provided be affordable for the average family?

**Physical Environment Probable Impacts:**

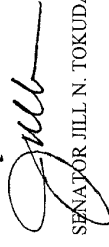
- A majority of the petition area is located within Zone D, which denotes areas of undetermined flood hazard and flooding is possible. Given the grading and deforestation that will occur as a result of this project, has HMP contacted FEMA to create a new projected Flood Insurance Rate Map (FIRM) based upon the proposed changes to the petition area? This would give the community an accurate assessment of their risk should this project move forward. Are you aware as to whether or not an entity has considered updating the FIRM based upon data received from the 2006 "40 days and 40 nights" storm events?
- According to your rockfall hazard analysis, there are four potentially hazardous areas. As proposed, this would be located directly above 8 of your residential lots and 2 of your mausoleums. What confidence do you have that these mitigating efforts would be adequate to ensure safety and prevent loss of life? Additionally,

did the study determine that these rockfall hazards were created as a result of the proposed project, or are they pre-existing hazards? If they are pre-existing, what threat do they pose, if any, to residential communities located along your property?

- As you noted in the DEIS, Kawa Stream has been classified as an impaired water body and considered one of the worst water quality streams in Hawai'i. You indicate that "the exact effect of the proposed action on the TMDLs for Kawa Stream is not certain." Given that TMDLs have a direct impact on water quality, how will you obtain this information prior to the Land Use Commission making their decision? Also, given that this will be a 10-20 year project, how will you adequately control soil erosion and run off? You indicate that long term erosional problems will be handled by vegetation and surface covering; however, there may be periods of years in which no vegetation or surface covering is provided. Given Windward O'ahu's tendency for increased rainfall, what hazards and negative impacts do you foresee as a result of this lack of proper erosion control?

If you have any questions, please feel free to contact our offices. For Senator Tokuda, please call 587-7215. For Representative Ito, please call 586-8470.

Sincerely,



SENATOR JILL N. TOKUDA



REPRESENTATIVE KEN ITO

CC: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawai'i  
Rachael Edinger, Helber Hastert & Fee Planners, Inc.

October 8, 2008

Senator Jill Tokuda  
Representative Ken Ito  
Hawai'i State Legislature  
State Capitol  
Honolulu, HI 96813

Dear Senator Tokuda and Representative Ito:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 22, 2008 providing comments on Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We are opposed to the project.  
Response: Your opposition to the Proposed Action is noted.
2. How serious is HMP in considering alternative 8.2, which would replace the subdivision with a residential retirement facility? Historically, there had been concerns raised over the height and size of Pohai Nani, yet you indicate that you would build a complex with a seven story residential tower similar in size on the mountainside. Have you taken into account the visual and scenic resources impacts, as well as potential soil and erosion concerns? What would be the projected unit and tenant count, and what impact would this have on traffic? Would this be sold as affordable senior housing units? Would there be day care services provided, and if so, what additional impact on traffic would you expect?  
Response: The EIS Rules and Regulations require that all projects address possible alternatives to the Proposed Action. The retirement facility was one such alternative, and was evaluated early in the process and rejected.
3. How serious is HMP about alternative 8.3? Given that you would still be petitioning to redesignate 56.6 acres, what assurances would the community



have that you wouldn't seek to add in a residential component at a later date? You indicate that the impacts on the scenic and visual resources would be limited, yet both Pohai Nani, the Hawai'i State Veterans Cemetery and the mountainside in between where you are proposing this expansion are highly visible from various parts of Kane'ōhe, especially from higher elevations like H-3, and the Pali and Likelike Highways. How do you reconcile that these visual resources, considered extremely important and highly valued by Windward residents and visitors alike, would not be compromised by this development?

Response: As a result of many similar comments received during the public comment period for the Draft EIS, Hawaiian Memorial Park (HMP) has decided to modify the development program for the project and has deleted the 20-lot residential subdivision and the Lipalu Street extension from the project.

In terms of the appearance of the landscape, HMP has a vested interest in providing a pleasant and attractive appearance for the expansion area. The impacts on view planes from the Proposed Action are described in Section 4.10 of the EIS, Scenic and Visual Resources, and demonstrated in several graphic figures. Additional analysis of view planes has been conducted for the Final EIS. Included in this analysis is a thorough review of the "Cemetery Only Alternative" that has been selected as the development to be considered by the State Land Use Commission.

For the Cemetery Only Alternative, the Petition Area will be marginally visible in some areas and completely shielded in others. Where the proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

Under most viewing circumstances, the mausoleums will not be visible from nearby surrounding neighborhoods because of ample vegetative buffers and topographic differences with the surrounding neighborhood. The project will include a minimum 50-foot buffer of existing vegetation between the adjoining residential property line and the cemetery areas. Some areas will include a re-vegetated buffer of approximately 100 feet in addition to the existing vegetation buffer. Figures 24, 28a, and 28b of the Draft EIS are still relevant to demonstrate the typical profiles of how the elevation difference and landscaped buffer will shield the Petition Area from view in the adjacent residential neighborhoods.

The Petition Area and associated cemetery are visible from H-3, although as a small portion of the overall viewshed which is predominately one of residential neighborhoods with the Oneawa Hills as a backdrop. Additionally this view is one that is seen for only a matter of seconds while travelling at 55 miles per hour in a car. Nevertheless, the project will be visible from this vantage point.

4. You state in the DEIS that "historic sites, both in the petition area and nearby, will be ensured to be cared for, with greater access to otherwise unknown historic sites." While your plan does incorporate marginal buffers around historic sites both inside and near your petition area (specifically Kawa'ewa'e Heiau), it also establishes public roadways around and within this historic complex. Is it your consultants' professional opinion that these resources would be better cared for if there was public street access surrounding these historic properties, providing access to not only lineal descendants or caregivers, but any member of the general public, regardless of their intentions?

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, the plan for the project has been modified to establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931, and include significant areas where the *laua'e* fern is found, to provide future supply for those who gather this plant. This preserve will be designed in careful consideration of site boundaries and in relationship to contiguous sites. There will be no development in this area except for a modest access road.

Subsequent to land use approvals, the Petitioner is required to prepare an Archaeological Preservation Plan. All of the issues related to protection of the sites will be addressed in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division.

In addition, HMP is very concerned about proper security within the project area for its existing families, its on-going business operations, and neighbors. HMP will always seek to protect its facilities as necessary and appropriate

through a variety of security measures. As the developed cemetery expands, HMP will be able to better monitor its property through the expanded accessibility. For additional security, HMP has two security guards who work in the evening hours.

5. You acknowledge the loss of conservation land, indicating that that housing opportunities, employment and tax revenue will counterbalance this. The Windward O'ahu Regional Plan clearly states that the preservation of conservation and agricultural areas are considered to be very important, even if it affects the existing housing stock. It went so far as to indicate that while Kane'ohē would continue to see development, it should maintain an open space ratio of not less than 60%. How would you reconcile this further loss of conservation land and open space proposed under the project with the Windward O'ahu Regional Plan?

Response: The overarching land use policies for Kāne'ohē originate with the General Plan of the City and County of Honolulu, and are further implemented by the Ko'olau Poko Sustainable Communities Plan (SCP) and zoning. We understand the relationships of the Proposed Action regarding these plans and regulations. We also recognize the need to amend the SCP and zoning in order to bring the Petition Area into compliance with these documents. We believe the Proposed Action does meet many of the goals, policies, and objectives of both the General Plan and the SCP, particularly by the elimination of the residential subdivision and the addition of the 9.4-acre cultural preserve. A cemetery is considered open space and is treated accordingly by the SCP.

6. You correctly state that, "...the SCP is shaped around two main concepts, including protection of the community's natural, scenic, cultural, historical and agricultural resources and systems. Key elements of the SCP's vision call for preserving and promoting open space throughout the region, and preserving and enhancing scenic, recreational, and cultural features that define Ko'olau's sense of place." You claim that the project would conform to major components of the SCP. Please explain how the project is in accordance with these stated goals of the SCP.

Response: Please refer to answer to Questions #3, 4, and 5 above, and discussion of the elimination of the residential subdivision and the creation of the cultural preserve.

7. While Kawa'ewa'e Heiau has been carved out of the petition area, we remain concerned about the integrity and preservation of this historic site and others in the area. How can we be certain that the complex as a whole is being preserved when your plan calls for each site to be preserved individually, potentially leaving historically important grounds to be developed?

Response: Please refer to answer to Question #4 above for discussion of the cultural preserve to be created.

8. You indicate that the City and County of Honolulu's Department of Planning and Permitting (DPP) has indicated a need for an additional 1,020 housing units in the Ko'olaupoko region between 2010 and 2030. Please provide us with information on specifically where DPP anticipated this growth to take place in the region, and whether its projections indicate the need to convert conservation land into the urban district. Given that the SCP will be up for review later this Fall, what is the possibility that these growth projections may change and shift more towards the urban core, especially given plans for a light rail system?

Response: The SCP indicated that new housing units should be anticipated as a result of "infill", but does not specify exactly where this should be. The need for housing in the Ko'olaupoko region is expected to increase as a result of a continuing trend in the decline of the size of average household size, both on O'ahu and in Kane'ohe, which are consistent with national trends. While the vast majority of population growth will be accommodated in other development plan areas, Ko'olaupoko is still projected to need additional housing units.

9. Please expound upon the extent to which the creation of four mausoleums will benefit the people of Hawai'i and the Windward community. Approximately how many niches will be created and what is the projected cost of these spaces? Will these niches and the corresponding services provided be affordable for the average family?

Response: The number of niches or other cremation inurnment options provided will be based on the community demand. There will always be a variety of choices in product and pricing to meet the full range of needs for the community. HMP price lists are available at the HMP office, as well as a list of the available niches and other items.

10. A majority of the petition area is located within Zone D, which denotes areas of undetermined flood hazard and flooding is possible. Given the grading and deforestation that will occur as a result of this project, has HMP contacted FEMA to create a new projected Flood Insurance Rate Map (FIRM) based

upon the proposed changes to the petition area? This would give the community an accurate assessment of their risk should this project move forward. Are you aware as to whether or not an entity has considered updating the FIRM based upon data received from the 2006-40 days and 40 nights' storm events?

Response: HMP has not contacted FEMA to create a new FIRM. We are not aware of an entity that considered updating the FIRM based upon the 2006 "40 days/40 nights" storm.

11. According to your rockfall hazard analysis, there are four potentially hazardous areas. As proposed, this would be located directly above 8 of your residential lots and 2 of your mausoleums. What confidence do you have that these mitigating efforts would be adequate to ensure safety and prevent loss of life? Additionally, did the study determine that these rockfall hazards were created as a result of the proposed project, or are they pre-existing hazards? If they are pre-existing, what threat do they pose, if any, to residential communities located along your property?

Response: As discussed in #3 above, the residential subdivision has been deleted from the development program. The soils engineer who prepared the analysis is highly qualified for this work, and we are completely confident in the results.

12. As you noted in the DEIS, Kawa Stream has been classified as an impaired water body and considered one of the worst water quality streams in Hawai'i. You indicate that "the exact effect of the proposed action on the TMDLs for Kawa Stream is not certain." Given that TMDL's have a direct impact on water quality, how will you obtain this information prior to the Land Use Commission making their decision?

Response: Retention areas are included as the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. This method of storm water control is nationally recognized as an environmentally superior approach to deal with the protection of down stream receiving waters. The retention areas will be scattered throughout the Petition Area to provide the required amount of storage and they will be grass lined to a depth of 18 inches (see Section 6.4 in the EIS for further discussion).

Further analysis regarding Total Maximum Daily Loads (TMDLs) was conducted in September 2008 by Element Environmental LLC, and their

findings have been incorporated in Section 6.4 of the Final EIS. Their full report is attached to the Final EIS as Appendix L. The retention areas will be designed to ensure that the project is helping to improve the water quality of both Kāwā Stream and ultimately Kane'ōhe Bay by providing some reduction necessary to achieve the TMDLs for Kāwā Stream. A retention area capacity of 1.3 acres will lead to a net reduction of storm runoff that will not enter Kāwā Stream.

The TMDL analysis found that the proposed retention system which has been developed to satisfy the City and County of Honolulu's design 10-year, 1-hour duration (2.5 inches per hour) storm event will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed TMDLs. The on-site retention volume to capture this excess runoff is 631,730 gallons. The runoff used in the 2005 TMDL report was 518,060 gallons. Because no additional runoff will Kāwā Stream, a net reduction of 136.3 kg TSS, 6.82 kg TN, and 1.4 kg TP will result from the project. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system.

As recommended in the TMDL analysis report, the Petitioner commits to developing an appropriate monitoring protocol in cooperation with the State Department of Health to build on past monitoring efforts of the TMDL Program, and to evaluate long-term success of the Petition Area's retention areas in helping to meet the necessary TMDL reductions for Kāwā Stream that are associated with the Petition Area.

13. Given that this will be a 10-20 year project, how will you adequately control soil erosion and run off? You indicate that long term erosional problems will be handled by vegetation and surface covering; however, there may be periods of years in which no vegetation or surface covering is provided. Given Windward O'ahu's tendency for increased rainfall, what hazards and negative impacts do you foresee as a result of this lack of proper erosion control?

Response: Construction will not be for continuous for 10-20 years. The project is projected for full build out during that time, with individual phases of construction to last ±6 months.

As discussed in detail in Section 4.3.3 of the Draft EIS, temporary and permanent erosion control measures will be implemented as Best Management Practices during grading, construction, and operation of the cemetery. During construction, the contractor will use mulching to provide the necessary erosion control after soils have been exposed. Commencement of construction activities will occur during dry months of the year. Temporary

erosion control measures can also include: using silt fences, stabilized construction entrances, catch basin and inlet protection, and dust control. Proper grading, pavement, and permanent grassing and landscaping of all open areas created by the grading operations will minimize soil loss from the site to acceptable levels. All of these plans must be approved by the DPP, and the State Department of Health as part of the National Pollutant Discharge Elimination Systems permitting. Permanent erosion control measures will include grading to provide proper drainage. Exposed areas will be paved or grassed and/or landscaped to match adjacent landscaping. Grass sod will be planted to minimize erosion. The permanent erosion control measures will protect the Petition Area against future soil erosion. It is the intention of the Petitioner to follow all necessary means to achieve proper erosion control.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



Laura H. Thelen  
Board of Land and Natural Resources  
Commissioner of Water Resource Management



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 9, 2008

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

FROM: *for* Morris M. Atta, Administrator *Maalene*  
 SUBJECT: Hawaiian Memorial Park Cemetery Expansion  
 LOCATION: Ko'olanu Park District, Island of Oahu, Hawaii; TMK: (1) 4-5-033.por.001  
 APPLICANT: Helber Hastert & Fee

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 18, 2008.

*A copy of the Draft Environmental Impact Statement is available for your review in Land Division office, Room 220.*

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 Darlene Nakamura at 587-0433. Thank you.

Attachments

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

Signed: *Paul J. Conry*  
 Date: JUN 10 2008

PAUL J. CONRY, ADMINISTRATOR  
 DIVISION OF FORESTRY AND WILDLIFE

cc: Central Files

Laura H. Thelen  
Board of Land and Natural Resources  
Commissioner of Water Resource Management



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

July 23, 2008

Hawaiian Memorial Life Plan, Ltd.  
 1330 Maunakea Street  
 Honolulu, Hawaii 96813

Attention: Mr. Jay Morford

Gentlemen:

Subject: Draft Environmental Impact Statement for Hawaiian Memorial Park Cemetery Expansion, Kaneohe, Oahu, Tax Map Key: (1) 4-5-33:portion 1

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

Other than the comments from Division of Forestry & Wildlife, Office of Conservation & Coastal Lands, Commission on Water Resource Management, Engineering Division, Land Division, the Department of Land and Natural Resources has no other comments to offer on the subject matter. Should you have any questions, please feel free to call our office at 587-0433. Thank you.

Sincerely,

*Maalene E. Underwood*  
 for Morris M. Atta  
 Administrator

Cc: OEQC  
 Helber Hastert & Fee

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Paul J. Conry  
Administrator  
DLNR, Division of Forestry and Wildlife  
PO Box 621  
Honolulu, HI 96809

Dear Mr. Conry:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated June 10, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. We note that you have no objections to the Proposed Action at this time.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

JANDA LINGZ  
GOVERNOR OF HAWAII



6A 28-728



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 9, 2008

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

FROM: Morris M. Atta, Administrator *M. Atta*  
SUBJECT: Hawaiian Memorial Park Cemetery Expansion  
LOCATION: Ko'olanu Poko District, Island of Oahu, Hawaii; TMK: (1) 4-5-033:por.001  
APPLICANT: Helber Hastert & Fee

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 18, 2008.

*A copy of the Draft Environmental Impact Statement is available for your review in Land Division office, Room 220.*

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 Darlene Nakamura at 587-04. Thank you.

Attachments

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

Signed: see attached  
Date: \_\_\_\_\_

cc: Central Files



STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
Office of Conservation and Coastal Lands

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

Laura H. Thelen  
Commissioner of Land and Natural Resources  
Russell Y. Tsutji  
Deputy Director  
Dora C. Kawahara  
Assistant Commissioner  
Planning and Ocean Resource Management  
Commissioner of Water Resource Management  
Conservation and Resource Administration  
Director and Wildlife  
Bureau of Conservation  
Land  
State Parks

REF:OCCL-MC

Correspondence OA-08-258

MEMORANDUM:

JUL 18 2008

TO: Morris M. Atia, Acting Administrator  
Land Division

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

SUBJECT: Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion and Residential Subdivision

TIMKS: (1) 4-5-33:1

LOCATION: Kāne'ōhe, Ko'olaupoko, O'ahu

The Office of Conservation and Coastal Lands (OCCL) has reviewed the Draft Environmental Impact Statement (DEIS) for the Hawaiian Memorial Park Cemetery Expansion and Residential Subdivision. The project involves lands in the General and Limited Subzones of the State Land Use Conservation District.

As the proposed project does not involve identified land uses in the Conservation District as outlined in Hawai'i Administrative Rules (HAR) §13-5, the applicant has petitioned the State Land Use Commission (LUC) to reclassify 56.6 acres of the parcel, taking them out of the Conservation District.

HAR §13-5 states that the objective of the General Subzone is to designate open space where specific conservation uses may not be defined, but where urban use would be premature; and that the objective of the Limited Subzone is to limit uses where natural conditions suggest constraint on human activities.

As stated in our earlier correspondence, OCCL would like to see the EIS more fully explain why the applicant feels that these objectives are no longer applicable to the parcel in question.

We have attached letters OCCL has received from the community regarding the project; the LUC would be the more appropriate agency to address the concerns raised in them.

Please contact Michael Cain at 587-0048 should you have any questions on this matter.

cc: Julianne McCreedy, Hui O Piko Iloa, 45-423 Ōhāhā St., Kāne'ōhe, HI 96744  
Grant Yoshimori, 45-464 Lipāhi St., Kāne'ōhe, HI 96744

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Samuel J. Lemmo  
Administrator  
DLNR, Office of Conservation and Coastal Lands  
PO Box 621  
Honolulu, HI 96809

Dear Mr. Lemmo:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawaii

Thank you for your letter dated July 18, 2008 (OA-08-258) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our responses:

1. The project involves lands in the General and Limited Subzones of the State Land Use Conservation District.  
Response: The EIS discloses that the project is within both the General and Limited subzones in Section 3.1.3, and on Figure 8.

2. HAR 13-5 states the objective of the General subzone is "to designate open space where specific conservation uses may not be defined, but where urban use would be premature"; and that the objective of the Limited Subzone is "to limit uses where natural conditions suggest constraint on human activities." As stated in our earlier correspondence OCCL would like to see the EIS more fully explain why the applicant feels that these objectives are no longer applicable to the parcel in question.

Response: We would like to let you know that the Petitioner has decided to modify the development program for the project in two significant ways: (1) elimination of the 20-lot residential subdivision and extension of Lipāhi Street intended to service these lots; and (2) establishing a 9.4-acre cultural preserve area that includes archaeological sites and areas where the laua'e fern is plentiful. This preserve area will remain in its current "natural" state except for a modest access road.

Section 3.1.3 discusses the Proposed Action in the context of the standards to determine whether land is appropriately situated to be considered for the State Urban District. Language in the Final EIS now includes the following:

"The General subzone is considered the least sensitive subzone. The objective of the General Subzone "is to designate open space where specific conservation uses may not be defined, but where urban use would be premature" (§13-5-14 (a), HAR). Among others, including one single-family dwelling, the Conservation District Rules and Regulations suggest that the General Subzone could accommodate "lands suitable for farming, flower gardening, operating of nurseries or orchards, grazing; including facilities accessory to these uses where the facilities are compatible with the natural physical environment" (§13-5-14 (b) (2), HAR).

The majority of the Petition Area (approximately 47 acres; 83%) is located in the General subzone. The physical characteristics of the Petition Area have been described as a highly disturbed Schefflera/Java Plum Forest. Only eight percent of the plant species identified on-site are native. The property does not function as a forest reserve for recharge purposes. The property will remain predominantly in vegetated open space, which is consistent with the intent of Conservation Land. Approximately 11.4 acres will be revegetated with appropriate native and Polynesian-introduced species and landscaping for the cemetery expansion will result in over 300 new trees. The existing significant historic sites and cultural practices will be preserved and retained.

The objective of the Limited subzone is "to limit uses where natural conditions suggest constraints on human activities" (§13-5-12 (a), HAR). Cemetery uses and residential units are not permitted in the State Conservation District; therefore a re-designation to the State Urban District by the State Land Use Commission is being sought.

Only 17% (9.6 acres) of the Petition Area is located in the Limited subzone, and 4.7 acres of this total will be located within the cultural preserve area as part of the preferred alternative, and will not be changed from its existing character except for an access road. Therefore, of the total 56.5-acre Petition Area, only 4.9 acres (8.7%) within the Limited subzone will be converted to cemetery use under the preferred alternative. The majority of the area will be open space (cemetery use), and human activity will be minimal in the steep sloped areas. The results of the Slope Stability and Rockfall Hazard performed for this EIS are discussed further in Sections 4.2 and 4.6, and the entire report is attached as Appendix B. The slope stability analysis found there to be no apparent potential for hazards associated with slope stability. Most slopes in the Petition Area are less than 20%; although some land with higher slope will need to be graded in order to ensure all land within the

Petition Area is stable. Most of these steeper lands will be revegetated and not used for burials, and therefore will not be areas where human activity is expected. There is a potential for hazards associated with rockfall, but these can be mitigated using available technology.

Only 17% (9.6 acres) of the Petition Area is located in the Limited subzone, and 4.7 acres of this total will be located within the cultural preserve area as part of the preferred alternative, and will not be changed from its existing character except for an access road. Therefore, of the total 56.5-acre Petition Area, only 4.9 acres (8.7%) within the Limited subzone will be converted to cemetery use under the preferred alternative. The majority of the area will be open space (cemetery use), and human activity will be minimal in the steep sloped areas. The results of the Slope Stability and Rockfall Hazard performed for this EIS are discussed further in Sections 4.2 and 4.6, and the entire report is attached as Appendix B. The slope stability analysis found there to be no apparent potential for hazards associated with slope stability. Most slopes in the Petition Area are less than 20%; although some land with higher slope will need to be graded in order to ensure all land within the Petition Area is stable. Most of these steeper lands will be revegetated and not used for burials, and therefore will not be areas where human activity is expected. There is a potential for hazards associated with rockfall, but these can be mitigated using available technology."

We appreciate your participation in this review process. Your letter and this response will be appended to the Draft EIS.

Sincerely,

HELBERT HASTER & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando Davidson, Land Use Commission, State of Hawaii  
Office of Environmental Quality Control  
Julianne McCreedy  
Grant Yoshimori

LINDA LINGLE  
GOVERNOR OF HAWAII



LAURA B. THILEN  
BOARD OF LAND AND NATURAL RESOURCES  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
COMMISSION ON WATER RESOURCE MANAGEMENT

RECEIVED

08 JUN 10 AM 0:06

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION  
POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 9, 2008

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

FROM: *for* Morris M. Atta, Administrator  
 SUBJECT: Hawaiian Memorial Park Cemetery Expansion  
 LOCATION: Ko'olau Poko District, Island of Oahu, Hawaii; TMK: (1) 4-5-033.por.001  
 APPLICANT: Helber Hastert & Fee

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 18, 2008.

*A copy of the Draft Environmental Impact Statement is available for your review in Land Division office, Room 220.*

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 Darlene Nakamura at 587-04. Thank you.

Attachments

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

Signed: *[Signature]*  
 Date: *6/10/08*

cc: Central Files

LINDA LINGLE  
GOVERNOR OF HAWAII



RECEIVED  
LAND DIVISION

2008 JUL 17 P 3:34

STATE OF HAWAII  
 DEPARTMENT OF LAND AND NATURAL RESOURCES  
 COMMISSION ON WATER RESOURCE MANAGEMENT  
 LAND & NATURAL RESOURCES  
 STATE OF HAWAII  
 HONOLULU, HAWAII 96809

July 14, 2008

REF: HMP Expansion deis

TO: Morris Atta, Administrator  
Land Division

FROM: Ken C. Kawahara, P.E., Deputy Director  
Commission on Water Resource Management

SUBJECT: Hawaiian Memorial Park Cemetery Expansion, Draft Environmental Impact Statement

FILE NO.: NA

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://www.hawaii.gov/dlnr/cwrm>.

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. 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.
- Permits required by CWRM: Additional information and forms are available at [www.hawaii.gov/dlnr/cwrm/forms.htm](http://www.hawaii.gov/dlnr/cwrm/forms.htm).
- 4. The proposed water supply source for the project is located in a designated ground-water management area, and a Water Use Permit is required prior to use of ground water.
  - 5. A Well Construction Permit(s) is (are) required before the commencement of any well construction work.
  - 6. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.

DRF-IA 06/19/2008

Morris Aita, Administrator  
-Page 2  
July 14, 2008

- 7. 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.
- 8. Ground-water withdrawals from this project may affect streamflows, which may require an instream flow standard amendment.
- 9. A Stream Channel Alteration Permit(s) is (are) required before any alteration can be made to the bed and/or banks of a stream channel.
- 10. A Stream Diversion Works Permit(s) is (are) required before any stream diversion works is constructed or altered.
- 11. A Petition to Amend the Interim Instream Flow Standard is required for any new or expanded diversion(s) of surface water.
- 12. 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.
- 13. We recommend that the report identify feasible alternative non-potable water resources, including reclaimed wastewater.

OTHER:

The document states that approximately 80% of the petition area will continue to be pervious surfaces; therefore, we do not anticipate any impacts to the quantity of ground and surface water flows.

We defer to the Department of Health regarding potential water quality impacts.

As noted above, if new wells are drilled to support the project, well construction, pump installation and water use permits would be required. The Koolauoko Aquifer System Area has a sustainable yield of 43 million gallons per day, of which 10,370 mgd has been allocated. Approval of a pump permit would be contingent on the results of pumping tests to assess any impacts to water resources or existing legal uses. Approval of a water use permit is subject to the applicant's ability to demonstrate consistency with legal criteria (established in § 174C-49(a) HRS).

If there are any questions, please contact Roy Hardy at 587-0274.

RH:ss

c:

OECC  
LUC  
HHF  
DOH Safe Drinking Water Branch  
Hawaiian Memorial Park  
Grant Yoshimori  
Julianne McCreedy, Hui O Pikoia

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Mr. Ken C. Kawahara, P.E.  
Deputy Director  
Dept. of Land and Natural Resources  
Commission on Water Resource Management  
PO Box 621  
Honolulu, HI 96809

Dear Mr. Kawahara:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 14, 2008 (REF: HMP Expansion.deis) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

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.  
  
Response: We note that we need to coordinate with the City and County of Honolulu on the water use and development plan, and plan to work closely with them as the project moves forward.
2. 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 (DOH) and the developer's acceptance of any resulting requirements related to water quality.  
  
Response: We note your recommendation that project approval be conditional upon review by the Department of Health, and will accept any resulting requirements related to water quality.

3. The proposed water supply source for the project is located in a designated ground-water management area, and a Water Use Permit is required prior to use of ground water.  
Response: The Draft EIS notes that the water supply source for the project is located in a designated ground-water management area, and a Water Use Permit is required prior to use of ground water.
4. A Well Construction Permit(s) is (are) required before the commencement of any well construction work.  
Response: Section 1.7 of the Draft EIS notes that a well construction permit is required before commencement of any well construction work that might be needed.
5. A Pump Installation Permit(s) is (are) required before ground water is developed as a source of supply for the project.  
Response: Section 1.7 of the Draft EIS notes that a pump installation permit is required before ground water is developed as a source of supply for the project.
6. The document states that approximately 80% of the petition area will continue to be pervious surfaces; therefore, we do not anticipate any impacts to the quantity of ground and surface water flows.  
Response: We note that you do not anticipate any impacts to the quantity of ground and surface water flows.
7. We defer to the Department of Health regarding potential water quality impacts.  
Response: We note that you defer to the DOH regarding potential water quality impacts, and intend to work closely with DOH as the project moves forward.
8. As noted above, if new wells are drilled to support the project, well construction, pump installation and water use permits would be required. The Koolauopoko Aquifer System Area has a sustainable yield of 43 million gallons per day, of which 10.370 mgd has been allocated. Approval of a pump permit would be contingent on the results of pumping tests to assess any impacts to water resources or existing legal uses. Approval of

a water use permit is subject to the applicant's ability to demonstrate consistency with legal criteria (established in § 174C-49(a) HRS).

Response: The Draft EIS notes that the Koolauopoko Aquifer System Area has a sustainable yield of 43 million gallons per day, and that approval of a pump permit will be contingent on the results of pumping tests to assess any impacts to water resources or existing legal uses. In addition, we note that approval of a water use permit is subject to the applicant's ability to demonstrate consistency with legal criteria (established in § 174C-49(a) HRS).

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
DOH Safe Drinking Water Branch  
Grant Yoshimori  
Julianne McCreedy, Hui O Pikoioa

DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

MEMORANDUM

To: Morris Atta  
Administrator

From: Charlene Unoki  
Assistant Administrator

Date: July 23, 2008

Re: Draft Environmental Impact Statement for Hawaiian Memorial Park  
Cemetery expansion, Kaneohe, Oahu, Tax Map Key: (1) 4-5-33:portion 1



Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Morris Atta  
Administrator  
DLNR, Land Division  
PO Box 621  
Honolulu, HI 96809

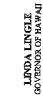
Dear Mr. Atta:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaiʻi

Thank you for your letter dated July 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our responses:

1. If any portion of the project includes hillsides or cliffs with a slope grade of 20% or greater, a slope study to determine the risks of rockfalls or landslides should be required as a condition of approval.  
  
Response: A report on rockfall hazards and slope stability was prepared for the Draft EIS, and was attached as Appendix B.
2. If a rockfall or landslide risk is determined or is suspected to exist, the developer should be required to create a hazard buffer zone in areas susceptible to such hazards that is of sufficient width to protect the health and safety of future homeowners in the vicinity of those risks.  
  
Response: As discussed in Section 4.6 of the Draft EIS, "the slope stability analysis determined that there is no apparent potential for hazards to the Petition Area that may be associated with slope stability. There is a potential for hazards associated with rockfall. These hazards can be mitigated using available technology. Mitigative measures may include one or a combination of the following: 1) securing the existing boulders using netting or chaining; 2) removal of the boulders; 3) installation of fencing uphill from proposed improvements; and 4) constructing a buffer zone between the rockfall hazard source and the proposed improvement.





STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
LAND DIVISION

POST OFFICE BOX 621  
HONOLULU, HAWAII 96809

June 9, 2008

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

FROM: *Scott Ezer* Morris M. Atta, Administrator  
SUBJECT: Hawaiian Memorial Park Cemetery Expansion  
LOCATION: Ko'olau, Poko District, Island of Oahu, Hawaii; TMK: (1) 4-5-033.por.001  
APPLICANT: Helber Hastert & Fee

Scott Ezer  
Principal

HELBER HASTERT & FEE, Planners

*Scott Ezer*

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando Davidson, Land Use Commission, State of Hawaii  
Office of Environmental Quality Control

The choice of mitigative measure will depend on the specific site condition."

3. If a rockfall or landslide risk is determined or is suspected to exist, the developer should be required to provide a written disclosure of those risks to all potential homeowners.

Response: The Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative, and will become the Proposed Action. Therefore, there will not be any residential lots developed.

We appreciate your participation in this review process. Your letter and this response will be appended to the Draft EIS.

Sincerely,

Transmitted for your review and comment on the above referenced document. We would appreciate your comments on this document. Please submit any comments by July 18, 2008.

*A copy of the Draft Environmental Impact Statement is available for your review in Land Division office, Room 220.*

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 Darlene Nakamura at 587-04. Thank you.

Attachments

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

Signed: *Scott Ezer*  
Date: 7/5/08

cc: Central Files

RECEIVED  
LAND DIVISION  
JUL 11 10 45 AM '08

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Eric T. Hirano  
Chief Engineer  
DLNR, Engineering Division  
PO Box 621  
Honolulu, HI 96809

Dear Mr. Hirano:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 5, 2008 (DEISHawaiianMemorialPark Cemetery Oahu.627) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. We note that you confirm the project site is located in the Flood Insurance Rate Map Zone D and X, and the National Flood Insurance Program does not have any regulations for developments within Zone D and X.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel: 808.545.2055 • Fax: 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

DEPARTMENT OF LAND AND NATURAL RESOURCES  
ENGINEERING DIVISION

LM/MorrisAtta  
REF.: DEISHawaiianMemorialPark Cemetery  
Oahu.627

COMMENTS

- We confirm that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zones D and X. The National Flood Insurance Program does not have any regulations for developments within Zones D and X.
- Please take note that the project site, according to the Flood Insurance Rate Map (FIRM), is located in Zone.
- Please note that the correct Flood Zone Designation for the project site according to the Flood Insurance Rate Map (FIRM) is \_\_\_\_\_.
- Please note that the project must comply with the rules and regulations of the National Flood Insurance Program (NFIP) presented in Title 44 of the Code of Federal Regulations (44CFR), whenever development within a Special Flood Hazard Area is undertaken. If there are any questions, please contact the State NFIP Coordinator, Ms. Carol Tyau-Beam, of the Department of Land and Natural Resources, Engineering Division at (808) 587-0267.
- Please be advised that 44CFR indicates the minimum standards set forth by the NFIP. Your Community's local flood ordinance may prove to be more restrictive and thus take precedence over the minimum NFIP standards. If there are questions regarding the local flood ordinances, please contact the applicable County NFIP Coordinators below:
  - Mr. Robert Sumitomo at (808) 768-8097 or Mr. Mario Siu Li at (808) 768-8098 of the City and County of Honolulu, Department of Planning and Permitting.
  - Mr. Kelly Gomes at (808) 961-8327 (Hilo) or Mr. Kiran Emler at (808) 327-3530 (Kona) of the County of Hawaii, Department of Public Works.
  - Mr. Francis Cerizo at (808) 270-7771 of the County of Maui, Department of Planning.
  - Mr. Mario Antonio at (808) 241-6620 of the County of Kauai, Department of Public Works.

- The applicant should include water demands and infrastructure required to meet project needs. Please note that projects within State lands requiring water service from the Honolulu Board of Water Supply system will be required to pay a resource development charge, in addition to Water Facilities Charges for transmission and daily storage.
- The applicant should provide the water demands and calculations to the Engineering Division so it can be included in the State Water Projects Plan Update.

Additional Comments: \_\_\_\_\_

Other: \_\_\_\_\_

Should you have any questions, please call Ms. Suzie S. Agraan of the Planning Branch at 587-0258.

Signed:   
ERIC T. HIRANO, CHIEF ENGINEER

Date: 10/5/08



UNIVERSITY  
of HAWAII  
MANOA

July 23, 2008  
RE: 0781

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813  
(808) 522-5233

Dear Mr. Morford:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
Kaneohe, Oahu, Hawaii

Hawaiian Memorial Park (HMP) is a privately owned cemetery located in Kaneohe, Oahu. Since 1961, the cemetery has grown from an initial size of six acres to its current size of approximately eighty acres. The remains of over thirty thousand individuals are interred on its grounds. For the last fifteen years, HMP has been owned and operated by Hawaiian Memorial Life Plan Ltd. Hawaiian Memorial Life Plan Ltd. proposes action to (1) expand available cemetery grounds; and (2) construct 20 single-family residential lots. Of the 56.6 acres comprising the Petition Area, approximately 33.8 will be utilized for burials, while 22.8 acres will be allotted for residential use and supporting infrastructure. The remaining acreage will be re-vegetated and designated as open space. Construction will proceed in several phases (of seven to eighteen acres each), with phase completion estimated for every three to five years. Grading will be necessary in much of the Petition Area in order to establish appropriate slopes. Significant historic sites within the Petition Area will be preserved, and cultural access to Kawa'ewa'e Heiau and hula and lei gathering areas will continue.

This review was conducted with the assistance of Ryan Riddle, Environmental Center.

July 23, 2008  
Page 2

**General Comments**

We find the proposed project, a combination of cemetery expansion and residential development, a strange combination. We are in favor of mixed-use development but this is not what we had in mind. We find the Cemetery Only alternative discussed on page 8-1 to 8-4 to be superior to the preferred alternative. The two projects don't seem to be a natural fit. Aside from the odd pairing, one of the main problems with this project is the lack of potable water. According to the draft environmental impact statement (DEIS) the Honolulu Board of Water Supply (BWS) has indicated that "existing [water supply] systems cannot service these new lots" (p. 6-10). There are indications that there may be a supply of non-potable water that can be used for irrigation so it would seem to make sense to use the entire 40.2 acres of land for expansion of the cemetery. Developing 20 units of housing will contribute a very small amount to the overall need for housing in the region, only 2.5 percent according to the statistics cited in the DEIS (p. 3-5).

In addition to our general comments, we also have several specific comments.

**Regional Location, Figure 1 (p.1-2)**

The map on page 1-2 is somewhat confusing. The Petition Area is delineated by the dotted black line but there is no indication of what the solid black line delineates.

**Alternative Considered (pp. 1-8 - 1-9)**

Alternative II on page 1-9 considers the development of a residential retirement facility in place of a 20-lot subdivision. You cite two problems with this option, both dealing with access. Problem one pertains to gaining access to the potential retirement facility through property controlled by the existing Pohai Nani facility. Has anyone approached Pohai Nani and asked if they would grant Hawaiian Memorial Park access through their property? One would suspect the offer might be accepted if the existing facility is compensated for providing the access.

The second problem would be the increase in traffic if access to the proposed retirement facility (at least in this alternative) was through Lipaii Street. How much traffic would a retirement facility generate? One would suspect that it would be far less than a residential development. Was this option considered in the traffic analysis that was performed for the proposed project?

**Statement of Purpose and Need for Action (p. 1-11)**

What is the current capacity of other cemeteries on Oahu? How much will the expansion of Hawaiian Memorial Park add to that capacity?

July 23, 2008  
Page 3

**Proposed Concept Plan, Figure 4 (p. 2-4)**

While a vegetated buffer is planned to screen off a majority of the homes from the cemetery, a handful of lots will be facing open cemetery grounds. Will a buffer of trees be utilized to create a visual barrier opposite these lots?

**Hawaii State Plan (pp. 3-1 - 3-4)**

In the discussion on the existing sanitary sewer line on p. 3-3, the use of non-potable water for irrigation is mentioned. The DEIS states that the use of non-potable water will be "explored for cemetery irrigation." What is meant by "explored"? If there are sources of non-potable water suitable for irrigation shouldn't they be used? Were sources of water explored in the Preliminary Engineering Report conducted by SSFM International? This would seem to be a key issue since the Honolulu BWS was cited in this DEIS as saying that they may not be able provide water service to the proposed cemetery expansion.

**Mitigation (pp. 4-18)**

Four mitigative measures are given for addressing rockfall hazards. While it is understood that the action of choice will depend on specific site conditions, can you give examples of situations/conditions in which one measure is favored over another?

**Land Study Bureau, Figure 1.5 (p. 4-9)**

This figure is missing a key which to interpret LSB Productivity levels.

**Mitigation (p. 4-20)**

How will the determination on when and if to use Polynesian introduced plants be made? Who will make the decision?

Can a quantitative estimate of the amount of laua'e (*Phymatosorus grossus*) in the petition area be given? In what sectors of the petition area is the concentration greatest? Is laua'e abundant in areas adjacent to the petition area (on the steep wooded slopes), or is the majority of the laua'e in the area to be found within the petition region?

July 23, 2008  
Page 4

**Affected Environment (p. 5-2)**

In the section on population trends and projections, the DEIS states "No data is kept on how many cremated remains are scattered. However, the last several years have seen a leveling of this trend." How do you know that this trend is leveling off if no data is kept? Are you assuming that practices here are similar to data collected nationwide?

**Existing Roadway System (p. 6-3)**

Given that HMP closes the vehicular access gates at dusk, is there a possibility that visitors may choose to access the cemetery through Lipalu Street? How will you discourage visitors from parking on the sides of the street throughout the day?

**Probable Impacts (p. 6-17)**

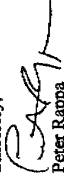
In the section on Solid Waste, the DEIS states that the typical range of per capita solid waste generation for Oahu is 9.0 lbs. per day. Where did you obtain this figure?

**Alternatives to the Proposed Action (pp. 8-1 - 8-4)**

A more robust discussion of the alternatives in section 8.2 and 8.3 would have included the pros and cons mentioned in the Alternatives Considered section, pages 1-8 to 1-9 in the Introduction and Summary of the DEIS. In that initial section the alternatives designated as Alternative II and Alternative III contain potential drawbacks to their implementation that are not mentioned at all in the latter section on Alternatives to the proposed Action. A person skipping the introduction and summary section of the DEIS would miss these arguments because they are not made later in the document.

Thank you for the opportunity to review this Draft EIS.

Sincerely,



Peter Rappa  
Environmental Review Coordinator

cc: OEQC  
Dan Davidson, LUC  
Rachael Edinger, HH&F  
James Moncur, WRRC  
Ryan Riddle

October 8, 2008

Peter Rappa  
Environmental Review Coordinator  
Environmental Center  
University of Hawai'i  
2500 Dole Street, Krauss Annex 19  
Honolulu, HI 96822

Dear Mr. Rappa:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated July 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We find the proposed project, a combination of cemetery expansion and residential development, a strange combination. We find the Cemetery only alternative to be superior to the preferred alternative. One of the main problems is the lack of potable water. There are indications that there may be a supply of non-potable water that can be used for irrigation, so it would make sense to use the entire area for expansion of cemetery. Developing 20 units of housing will contribute a very small amount to the overall need for housing in the region, only 2.5 percent.

Response: All landowners have the privilege of considering appropriate alternative uses for their property subject to the required land use approval process. It was appropriate for Hawaiian Memorial Park (HMP) to consider a consistent and modest extension of the existing residential land use surrounding its property. Nevertheless, we would like to let you know that HMP has decided to modify the project development program in two ways: (1) elimination of the 20-lot residential subdivision and the Lipalu Street extension intended to service these lots; and (2) a 9.4-acre cultural preserve will be created immediately east of Kawa'ewa'e Heiau.

Mr. Peter Rappa  
Hawaiian Memorial Park Cemetery Expansion Project  
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2. The map on page 1-2 is somewhat confusing. The Petition Area is delineated by the dotted black line but there is no indication of what the solid black line delineates.

Response: Figure 1, Regional Location, has been changed in the Final EIS to include a legend clarifying that the black dotted line outlines the Petition Area, and the solid black line delineates the TMK boundary.

3. Related to Alternative II: did you approach Pohai Nani about access through their property? How much traffic would a retirement facility generate?

Response: The Petitioner did approach Pohai Nani to inquire about gaining access through their property, and was not successful in securing cooperation for this. The Traffic Impact Analysis Study performed for the project did analyze future conditions with Alternative II (called Alternative B in the study). While the averages for unsignalized and signalized intersections are virtually the same for all alternatives (including the Proposed Action), most of Alternative II's trip numbers would be higher than for the Proposed Action (see Table 13 of the traffic study), with the AM peak hour trips almost triple those of the Proposed Action.

4. What is the current capacity of other cemeteries on O'ahu? How much will the expansion of HMP add to that capacity?

Response: The specific numbers related to capacity at other cemeteries on O'ahu is proprietary and was not shared with us. We do know that a new cemetery is being considered in the Hawai'i Kai area, but it has not been completed and the reasons surrounding this are unknown. Demand and need for burial services in Hawai'i is a very real community service, and is in fact rising. This will not go away if HMP does not expand the cemetery.

5. Will a buffer of trees be utilized to create a visual barrier opposite the new residential lots from the cemetery?

Response: New residential lots will not be built as discussed in the response to Question #1 above.

6. The DEIS states that the use of non-potable water will be "explored for cemetery irrigation." What is meant by "explored"? If there are sources of non-potable water suitable for irrigation shouldn't they be used? Were sources explored during the Preliminary Engineering Report?

Response: We have identified existing irrigation wells in the area serving Hawai'i Veterans Cemetery. We believe that similar wells can be developed on-site at HMP. However, we cannot be absolutely certain of this resource until exploratory wells are drilled.

7. Four mitigative measures are given for addressing rockfall hazards. While it is understood that the action of choice will depend on specific site conditions, can you give examples of situations/conditions in which one measure is favored over another?

Response: The rockfall hazards report was a preliminary report. The specific mitigation measures to be employed for rockfall hazards will be made when a more detailed geotechnical report is completed.

8. Figure 15 is missing a key with which to interpret LSB Productivity levels.

Response: Figure 15, LSB, has been changed in the Final EIS to include a legend clarifying the productivity levels shown on the Figure.

9. How will the determination on when and if to use Polynesian introduced plants be made? Who will make the decisions?

Response: The EIS identifies a palette of native and Polynesian introduced plants that are suitable for landscape material. A registered landscape architect will prepare a landscape plan with selection of plant materials when construction drawings are submitted for approval

10. Can a quantitative estimate of the amount of laua'e in the petition area be given? In what sectors of the petition area is the concentration greatest (adjacent to the petition area or within?)

Response: We had our Botanist revisit the Petition Area and area immediately surrounding it to survey for areas of greatest concentration of laua'e. We have added a new Figure to the Final EIS (Figure 25) that shows the locations of greatest laua'e concentration, and the cultural preserve for the project includes a significant portion of the laua'e identified by our Botanist. Approximately 2.5 acres of laua'e were found within the Petition Area, with 1.1 acres outside, near the Kawa'ewa'e

Heiau. In addition, the Final EIS will be revised to incorporate a cultural preserve area of 9.4 acres that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau, as well as 1.2 acres where laua'e is plentiful.

11. Section on population trends and projections in the DEIS states that no data is kept on how many cremated remains are scattered, but in the last several years the trend has leveled; how do we know this if no data is kept? Are we following national trends?

Response: We do know how many cremations there are, just not how many are scattered.

12. Given that HMP closes the vehicular access gates at dusk, is there a possibility that visitors may choose to access the cemetery through Lipalu St.? How will you discourage visitors from parking on the sides of the street throughout the day?

Response: People park along interior roadways in close proximity to the gravesite being visited.

13. DEIS states that the typical range of per capita solid waste generation for O'ahu is 9.0 lbs per day. Where did you obtain this figure?

Response: The figure was obtained from the City and County of Honolulu Environmental Services Refuse Division.

14. Section 8.2 and 8.3 need a more robust discussion on pros and cons for these alternatives, especially those mentioned on p. 1-9 that state potential drawbacks to Alternative II and III. A person skipping the introduction and summary section of the DEIS would miss these arguments because they are not made later in the document.

Response: We thank you for the suggestion and have added language into the EIS to augment the discussion of alternatives. Section 8.3 of the Final EIS has been significantly expanded since, as discussed in #1 above this is now the preferred alternative.

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Hawaiian Memorial Park Cemetery Expansion Project  
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We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
James Moncur, WRRC  
Ryan Riddle, Environmental Center

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

650 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813  
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MUFI HANNEBANN  
MAYOR

HENRY FUS, FAICP  
DIRECTOR

DAVID K. TANOUÉ  
DEPUTY DIRECTOR

2008/ELOG-1277 (mw)

July 23, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Draft EIS for the Hawaiian Memorial Park Cemetery  
Expansion, Kaneohe, Koolauopoko, Oahu

In response to your May 23, 2008 request for comments on this project's draft Environmental Impact Statement, we have the following comments:

1. **Impacts on topography.** Section 4.2.2 needs to disclose that the project area's natural topography will be significantly altered in places and that the entire site will be graded. Appendix C provides a Conceptual Grading Plan which needs to be described in Section 4.2.2. The change in topography near existing residences should be discussed. This section also needs to specify the magnitude of change for both the cut areas and the fill areas, in terms of both size in acres and typical depths of various cut or fill locations.  
  
Also, clear illustrations of the proposed cut and fill areas should be provided. We recommend enlarging Figure 22 (an overall before-and-after site view) and providing close-up views (before and after) of Figure 22. Figure 28 a and b should also include cross sections of existing conditions before development. The elevations should be shown on the contour lines of the plans in the EIS.
2. **Scenic and Visual Impacts.** The above recommended illustrations would also make it easier for the reader to understand the discussion of scenic and visual impacts in Section 4.10.2. We recommend that the photos in Figure 23 be enlarged. Views from other vantage points should be included and evaluated such as H-3 Freeway and other sites near and far.

3. **State policies.** The following additions or corrections to Section 3.1 should be made:
  - The State Conservation Lands Functional Plan (1991) should be discussed to include the four (4) priority guidelines on page 6 and the paragraph on page 7 which calls for development to occur only on previously developed conservation lands and for "primarily pristine" lands to be preserved.
  - The discussion of Section 226-12 of the Hawaii State Plan should be expanded to include preservation of natural resources, views, and vistas.
  - The discussion of the State Land Use Law's eight (8) standards for urban district boundaries should discuss in standard #3 how the project area's topography is satisfactory for urban use, and in standard #8 how existing laws or regulations will protect the aesthetic quality of the site's landscape.
4. **County policies.** The fact that half of the project area has slopes greater than 20 percent (20%) needs to be discussed in Section 3.2.1, with regard to Policy 4 of the General Plan's Natural Environment Objective A, and Section 3.2.2 which should cover the Koolau-poko SCP's Preservation Boundary and its role of protecting undeveloped scenic and hillside areas, areas not readily adaptable to urban use, areas with general slopes of 20 percent (20%) or more, etc. The EIS should identify and discuss those sections of the SCP that may need to be amended.
5. **Affordable housing.** Section 2.4 discusses the affordable housing component of the proposed residential subdivision. It should state clearly the percentage and number of affordable housing being developed.
6. **Cultural impacts.** In section 4.9.3, the paragraph on the Kawa'ewa'e Heiau should be expanded to discuss how the historic features in the area surrounding the heiau and associated with the heiau will be protected as part of the heiau complex.
7. **Impacts on Drainage.** Drainage mitigation measures (Section 6.4.3) should include treatment processes to improve the water quality of the stormwater that the retention areas slowly release into the existing storm drain system. Also, the following changes to Appendix C are needed:
  - In Appendix C's Section 1.4, the City's "Rules Relating to Storm Drainage Standards" should be dated January 2000, not 1970.
  - In Appendix C's Section 3.2, isn't the Time of Concentration (Tc) a time-related adjustment for the discharge, and not a safety design factor?

- Appendix C lacks the following: official stamp, signature, authentication statement, and expiration date of license. Also, the four (4) conceptual plans in back should be marked as Figures 13, 14, 15, and 16.

Should you have any questions, please call Mike Watkins of our Planning Division at 768-8044, or, if you have questions on comment #7, call Mel Takakura of our Site Development Division at 768-8104.

Very truly yours,

  
Henry Eng. F.A.C.P., Director  
Department of Planning and Permitting

HE:js

cc: State Land Use Commission  
Office of Environmental Quality Control  
Office of Planning  
Heiber Hastert and Fee, Planners

p:\Div\Function\SLUA07-777 Hawaiian Memorial Park expansion\DEIS-response.doc



October 8, 2008

Henry Eng  
City and County of Honolulu  
Department of Planning and Permitting  
650 South King St. 7<sup>th</sup> Floor  
Honolulu, HI 96813



Dear Mr. Eng:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Impacts on topography. Section 4.2.2 needs to disclose that the project area's natural topography will be significantly altered in places and that the entire site will be graded. Appendix C provides a Conceptual Grading Plan which needs to be described in Section 4.2.2. The change in topography near existing residences should be discussed. This section also needs to specify the magnitude of change for both the cut areas and the fill areas, in terms of both size in acres and typical depths of various cut or fill locations. Also, clear illustrations of the proposed cut and fill areas should be provided.

Response: In some severe cases located at the southwest portion of the project site, the fill height is approximately 30 feet high, while the cut height is approximately 25 feet high. See conceptual grading plan for overall estimated earthwork quantities (cut and fill). With the exception of two (2) retention areas located northeast of the project, the typical depth for the retention areas will be 18 inches. Approximately 1.3 acres within the useable area will be dedicated to retention areas (please refer to page 10 in PER).

2. We recommend enlarging Figure 22 (an overall before-and-after site view) and providing close-up views (before and after) of Figure 22. Figure 28 a

Mr. Henry Eng  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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and b should also include cross sections of existing conditions before development.

Response: We have enlarged the images of Figure 22 and added existing topography lines to the Shallow Water Retention Areas Profiles (now Figures 29a and 29b) to show current and future topography.

3. The elevations should be shown on the contour lines of the plans in the EIS.

Response: The elevations have been added to the contour lines of the Concept Plan in the EIS.

4. Scenic and Visual Impacts. The above recommended illustrations would also make it easier for the reader to understand the discussion of scenic and visual impacts in Section 4.10.2. We recommend that the photos in Figure 23 be enlarged. Views from other vantage points should be included and evaluated such as H-3 Freeway and other sites near and far.

Response: Additional analysis of view planes has been conducted for the Final EIS. Section 4.10 includes several other vantage points both near and far, including the view from H-3. We should point out that the Proposed Action has been modified by eliminating the 20-foot residential subdivision and replacing it with more land area for the cemetery. In essence, the modification implements Alternative 3 in Chapter 8, the Cemetery Only Alternative. The Petition Area will be marginally visible in some areas, and completely shielded in others. Where proposed new cemetery area is visible, it will appear as open landscape with scattered trees of intermediate height. Another modification to the Proposed Action is the creation of an area that includes historic sites east of Kawa'eae Heiau, and large areas of the laua'e fern. The 9.4-acre cultural preserve will retain the same appearance as it currently has, as this area will not be altered except for a modest access road. Overall, the predominant viewplane will continue to be one of open space and the lush green of grass and trees.

New Figure 23f in the Final EIS depicts a before and after image as seen from Makamae Street at Lilipuna Road looking southeast. This viewpoint is approximately 1.9 miles from the Petition Area. The viewplane towards the Petition Area is predominately made up of residential housing in the foreground, with the green of the Oneawa Hills and Ko'olau Mountain Range still the principle background view. The proposed cemetery

expansion area is slightly visible, but overall the viewplane is still characterized by a green backdrop to the hills. The roofs of the mausoleums are visible, but are a minor element of the viewshed.

5. State policies. The following additions or corrections to Section 3.1 should be made:
  - The State Conservation Lands Functional Plan (1991) should be discussed to include the four (4) priority guidelines on page 6 and the paragraph on page 7 which calls for development to occur only on previously developed conservation lands and for "primarily pristine" lands to be preserved.
  - The discussion of Section 226-12 of the Hawaii State Plan should be expanded to include preservation of natural resources, views, and vistas.
  - The discussion of the State Land Use Law's eight (8) standards for urban district boundaries should discuss in standard #3 how the project area's topography is satisfactory for urban use, and in standard #8 how existing laws or regulations will protect the aesthetic quality of the site's landscape.

Response: The State Conservation Lands Functional Plan has been added to the discussion in Section 3.1.3. The discussion in Section 226-12 of the State Plan has been expanded, as has the discussion under State Land Use Law standards #3 and #8.

6. County policies. The fact that half of the project area has slopes greater than 20 percent (20%) needs to be discussed in Section 3.2.1, with regard to Policy 4 of the General Plan's Natural Environment Objective A, and Section 3.2.2 which should cover the Koolaupoko SCP's Preservation Boundary and its role of protecting undeveloped scenic and hillside areas, areas not readily adaptable to urban use, areas with general slopes of 20 percent (20%) or more, etc.

Response: Section 3.2.1 of the Final EIS has been changed to further explain the existing slopes of the Petition Area and impacts expected from the project.

7. The EIS should identify and discuss those sections of the SCP that may need to be amended.

Response: Two options for language changes to the Ko'olau Poko SCP are presented below, and included in the Final EIS (new language underlined):

Option 1: Section 2.2.7.4 Preservation Boundary, 3<sup>rd</sup> bullet p. 2-24 language could be changed to read "Golf courses and cemeteries not located within the urban community and/or agriculture boundaries described above." A map amendment would be needed for the residential portion of the Proposed Action. This option supports Section 3.1.2 in providing passive or active open space, is consistent with 3.1.3.8, Cemeteries; and is consistent with Section 2.2 Key Elements of the Vision 2<sup>nd</sup> bullet, "preserve and promote open space throughout the region" (p. 2-2).

Option 2: Section 2.2.7.1 p. 2-20 language could be changed to read "The Urban Community Boundary is intended to exclude the following areas: Undeveloped parcels on the slopes of Kaiwa Ridge, Oneawa Hills, except below the 450-foot elevation on the western side adjacent to Hawaii State Veterans Cemetery and Puu o Ehu;"

8. Affordable housing. Section 2.4 discusses the affordable housing component of the proposed residential subdivision. It should state clearly the percentage and number of affordable housing being developed.

Response: Since the 20-lot residential subdivision has been eliminated from the Proposed Action, the Affordable Housing requirements are no longer applicable to this project.

9. Cultural Impacts. In section 4.9.3, the paragraph on the Kawa'awa'e Heiau should be expanded to discuss how the historic features in the area surrounding the heiau and associated with the heiau will be protected as part of the heiau complex.

Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'awa'e Heiau is part of a complex of cultural sites, not a discrete site. In this context, as discussed above, the project will establish a cultural preserve that encompasses five archaeological sites within the Petition Area east of the Kawa'awa'e Heiau, and will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This

preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

10. Drainage mitigation measures (Section 6.4.3) should include treatment processes to improve the water quality of the stormwater that the retention areas slowly release into the existing storm drain system.

Response: Retention areas alone act as a treatment process to improve water quality, as they allow the settling of fine particles and pollutants associated with the storm water runoff, which is considered a measure for improving water quality per City Standards. Also, the retention areas will not be releasing runoff off-site, as they are designed hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. Section 6.4 of the Final EIS discusses in greater detail how the retention areas will ensure that pollutant loads for Kāwā Stream and Kāne'ōhe Bay will be reduced as a consequence of the retention areas.

11. In Appendix C's Section 1.4, the City's "Rules Relating to Storm Drainage Standards" should be dated January 2000, not 1970.

Response: The PER will be revised in the Final EIS to include the correct January 2000 date for the City's Rules Relating to Storm Drainage Standards.

12. In Appendix C's Section 3.2, isn't the Time of Concentration (To) a time-related adjustment for the discharge, and not a safety design factor?

Response: Yes, Tc is a time-related adjustment for the storm water runoff, but it is indirectly related to a safety design factor. By using a lower Tc, a higher K (correction factor) is obtained which results in a higher rainfall intensity value (I) when used in the Rational Formula. Therefore the drainage calculations in the PER assumed a lower Tc to conservatively calculate higher runoff values (Q). The retention areas were then sized based on the higher runoff values.

13. Appendix C lacks the following: official stamp, signature, authentication statement, and expiration date of license. Also, the four (4) conceptual plans in back should be marked as Figures 13, 14, 15, and 16.

Response: The PER included in the Final EIS will be revised to include the items noted as missing.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

David A. Krupp, Ph.D.  
337A Kalama Street  
Kailua, HI 9674

Dear Dr. Krupp:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The Kāne'ōhe Bay Regional Council makes recommendations to the State of Hawai'i in response to issues relevant to the Kāne'ōhe Bay Master Plan. I was also present during the April 2008 meeting of the Kāne'ōhe Bay Regional Council to which project representatives for the proposed Hawaiian Memorial Park Cemetery Expansion made a presentation. The draft EIS did not make specific mention of the Kāne'ōhe Bay Master Plan nor how the proposed expansion of the Memorial Park integrates with this Master Plan.

Response: Thank you for pointing out this oversight. A new Section, 3.1.6, has been added to Chapter 3 of the Final EIS to discuss the Kāne'ōhe Bay Master Plan and how the project relates to the Plan.

Retention areas are the preferred method to control storm water runoff. The retention areas will hold storm water and allow sediment to settle as storm water percolates. The areas will be scattered throughout the cemetery to provide the required amount of storage and they will be grass lined to a depth of 18 inches. In compliance with the guidelines and recommendations contained in the Total Maximum Daily Load (TMDL) analysis performed for the Final EIS regarding pollutant control within the Kāwā Stream Watershed, the retention areas will be designed to ensure that the project will help to improve the water quality of both Kāwā Stream

David A. Krupp, Ph.D.  
337A Kalama Street  
Kailua, HI 9674  
July 23, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

I am a Professor of Marine and Biological Sciences at Windward Community College and an Affiliate Faculty member of the Hawai'i Institute of Marine Biology. I also represent the Hawai'i Institute of Marine Biology on the Kāne'ōhe Bay Regional Council. The Kāne'ōhe Bay Regional Council makes recommendations to the State of Hawai'i in response to issues relevant to the Kāne'ōhe Bay Master Plan. During the past year I have served as the chair of the Kāne'ōhe Bay Regional Council. I was also present during the April 2008 meeting of the Kāne'ōhe Bay Regional Council to which project representatives for the proposed Hawaiian Memorial Park Cemetery Expansion made a presentation. Unfortunately, my schedule precluded me from doing a detailed review of the draft Environmental Impact Statement (EIS). However, my quick review of the draft EIS revealed that there was no specific mention of the Kāne'ōhe Bay Master Plan nor how the proposed expansion of the Memorial Park integrates with this Master Plan. It seems to me that a comprehensive EIS should have addressed how the proposed expansion impacts this Master Plan.

I also noted that while the draft EIS mentions making a presentation to the Kāne'ōhe Bay Regional Council, there was no mention of my comments regarding how the proposed expansion violates the spirit of the Kāne'ōhe Bay Master Plan. This Master Plan seeks to minimize development in the Kāne'ōhe Bay watershed and specifically includes provisions to convert urban areas into conservation areas rather than the reverse (see p. 82 of the Master Plan). However, the proposed Memorial Park expansion includes provisions to convert conservation areas into urban areas. The draft EIS needs to address this issue, as well as other relevant issues relating to the Kāne'ōhe Bay Master Plan.

Sincerely,

  
David A. Krupp

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert & Fee, Planners

Dr. David Krupp  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
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and ultimately Kane'ohé Bay by providing some reduction necessary to achieve the TMDLs for Kāwā Stream. A retention area capacity of 1.3 acres (589,215 gallons) will lead to a net reduction of storm runoff that will not enter Kāwā Stream. The retention areas will help to meet the load allocations required to help meet the TMDL's set for Kāwā Stream by providing 27.5% of the net load allocations reduction in Total Suspended Solids, 17.5% of the net reduction in Total Nitrogen, and 17% in net Total Phosphorus.

2. While the Draft EIS mentions making a presentation to the Kane'ohé Bay Regional Council, there was no mention of my comments.

Response: While some in attendance at the Council meeting commented that they were against any development in the watershed, the Council did not take any action related to the Proposed Action. The Final EIS has been strengthened to discuss the Kane'ohé Bay Master Plan and its relevant points to the Proposed Action, and the connection between the project and guidelines adopted by the U.S. Environmental Protection Agency and the State Department of Health regarding targets for the reduction of TMDL allocations for Kāwā Stream, which will help to improve the water quality of Kane'ohé Bay.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 23, 2008

Scott Ezer, Principal  
Helber Hastert & Fee, Planners  
733 Bishop Street, Suite 2590  
Honolulu, HI 96813

Dear Scott:

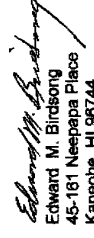
Re: Comments - Draft EIS, HMP Cemetery Expansion

Regarding my concerns about the Proposed Action, I refer you back to my January 25 comment letter responding to the EISPN. It and your response are in the Draft EIS. There has been no change in my position as detailed in that letter. Any remaining unresolved issues can be addressed at an appropriate time.

Note that an apparent inadvertent situation prevented your response to item 12 of my letter from being printed in the Draft EIS. Please correct this oversight by a notation in the Final EIS.

I have a few ideas that might make the Proposed Action more palatable but I believe it is premature to write about my thoughts at this time. I feel this way because the No Action Alternative appears to be the consensus within the Pikoloa subdivision and among those residents participating in this EIS process who live adjacent to or are able to view the Conservation District Land. I am hopeful there will be an opportunity to discuss my ideas as the process continues.

Sincerely,

  
Edward M. Birdsong  
45-181 Neepapa Place  
Kaneohe, HI 96744

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

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Ed Birdsong  
45-161 Neepapa Pl.  
Kāne'ohe, HI 96744

Dear Mr. Birdsong:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 23, 2008 regarding the Draft Environmental Impact Statement (EIS) for above-mentioned project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. Regarding my concerns about the Proposed Action, I refer you back to my January 25 comment letter responding to the EISPN. It and your response are in the Draft EIS. There has been no change in my position as detailed in that letter. Any remaining unresolved issues can be addressed at an appropriate time.  
Response: We note that there has been no change in your position from your comment letter on the EIS Preparation Notice.
2. Note that an apparent inadvertent situation prevented your response to item 12 of my letter from being printed in the Draft EIS. Please correct this oversight by a notation in the Final EIS.  
Response: The final page of our correspondence to you from the EIS Preparation Notice will be added into the Final EIS.
3. I have a few ideas that might make the Proposed Action more palatable but I believe it is premature to write about my thoughts at this time. I feel this way because the No Action Alternative appears to be the consensus within the Pikoioa subdivision and among those residents participating in this EIS process who live adjacent to or are able to view the Conservation District Land. I am hopeful there will be an opportunity to discuss my ideas as the process continues.

Pacific Guardian Center • 733 Bishop Street, Suite 2590 • Honolulu, Hawaii 96813  
Tel. 808.545.2055 • Fax 808.545.2050 • www.hhf.com • e-mail: info@hhf.com

Mr. Ed Birdsong  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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Response: Thank you and we look forward to continued communication with you.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

July 23, 2008

Ms. Rachael Edinger, Project Planner  
Heiber Hastert & Fee, Planners  
733 Bishop Street, Suite 2590  
Honolulu, HI 96813

RE: Hawaiian Memorial Park Cemetery Expansion  
Location: O'ahu, Ko'olaupoko District  
Tax Map Key No.: 4-5-033:001 por. 001

Dear Ms. Edinger:

Enclosed, please find a copy of a letter that I sent to Hawaiian Memorial Life Plan, Ltd. in response to their Draft Environmental Impact Statement to support their plans for expansion of their cemetery across the hillside across from my home in the Piko Iloa neighborhood in Kane'ohe. Their expansion project also includes 20 homes.

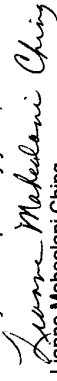
I would hope that in your consideration of their project plans that you would also strongly consider my concerns and the concerns of others in my neighborhood. There are so many reasons to not support their request for a change to urban zoning from conservation land. I believe it was made conservation land for a reason -- to conserve an endangered water shed area and to protect the surrounding lands and homes from flooding and erosion.

There are several historical and culturally significant archeological sites spread across that same hillside that Hawaiian Memorial wants to expand upon. The most important of which is a luakini or sacrificial heiau. The gathering rights and other cultural practices of kanaka maoli like myself will be greatly impinged upon.

Lastly, if they are allowed to expand the graveyard, it will demolish and rid the hillside of precious green open space and natural life that will never come back and our quiet, safe neighborhood will never be the same again.

Please consider all options and review all the information carefully before making your decision. I would hope that you would not proceed with this project.

Humbly and respectfully yours,

  
Lianne Mahealani Ching  
45-431 Ohaha Street  
Kane'ohe, HI 96744

July 23, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

RE: Hawaiian Memorial Park Cemetery Expansion  
O'ahu Ko'olaupoko District  
Tax Map Key No.: 4-5-033:001 por. 001

Dear Mr. Morford:

I am writing to respond to some of the contents presented in your Draft Environmental Impact Statement (EIS) regarding your proposed expansion of the Cemetery. I am a resident of Ohaha Street which is one of the streets which runs along the hillside that you plan to expand your cemetery on.

I appreciate receiving a copy of the draft and I also appreciate your efforts in keeping things open to discussion and sharing.

Given the choice as far as which alternative to choose (as presented in section 8.0 in the draft), I would choose "No Action". The reason? All of the reasons that we gave to you at the community meeting we had with your company reps and owners -- increase in runoff into our streams and bay, killing and devastation of our forest and green hillside, worsening of an already existing drainage problem, and desecration of my ancestor's lands.

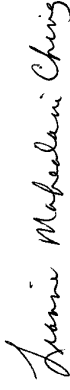
I am against the expansion for all of the reasons I noted in the paragraph above. But, I am especially insulted by the fact that you continue to ignore the importance of leaving the land and historical sites as they lay. Just the fact, that you will bulldozing down trees and terracing the land; just the fact that you will be walking on the land (you probably already have stepped foot on it or some representative of yours) -- you will desecrate and shame the land and the land will no longer have the same spiritual significance or sacredness to me or other Hawaiians. The land will be spoiled and touched by non-Native Hawaiian people who have no clue of how special this place is.

As noted in the EIS, there are at least 12 significant archaeological sites noted within or near the petition site including a luakini heiau which are not commonly found -- Kawaeae Heiau. In addition, there may be two other heiaus as well as dwelling sites located on this hillside that you want to expand your graveyard on. It would be a tremendous and terrible loss to the community and our culture if these sites were ruined or encapsulated on "little islands" within a park of dead bodies! I'm sorry, but that is how I see it as appearing.

I respectfully ask you to stop any further plans for development of this hillside. It is one of the last remaining green areas in Kaneohe that the community can access and utilize for cultural practices and recreation. It is an important watershed for the environment and may possibly be a habitat for several native species of birds or fishes. More study needs to be done in this area in particular.

If you truly want to let us have long term access to this area and not have a negative impact on your neighborhood and environment, then you will do the right thing; the pono thing; and stop your efforts to expand the cemetery.

Humbly and respectfully yours,



Lianne Mahealani Ching

Cc:

Land Use Commission, State of Hawaii  
Helber, Hastert and Fee, Planners  
Office of Environmental Quality Control

In this same area grows some of the most green and sweet smelling laua'e ferns that I have ever seen. The lush green trees in this area protect these ferns from the sunlight during the day thus allowing it to stay green and fragrant. The only other place that I know of that have laua'e of similar quality, is up at the Pali – which is not very accessible because of where it grows.

Being of Native Hawaiian descent and a practitioner of the art of hula, this spot to pick ferns for our adornment for hula is very accessible for my halau and other halau in the area. It is an important part of being a dancer. It has extra special significance in that it is near so many culturally important historical sites. This gives it more mana. It is only proper that being from a halau in Kane'ohe, I should dance with a lei made from material gathered in Kane'ohe. There are not very many places that have such beautiful dark green laua'e AND that is accessible for dancers to get to.

The loss of the trees and natural foliage in this area will mean more noise, less likely native birds and plants, strong possibility of landslides and flooding, and no shade and moisture for the beautiful laua'e ferns to continue to grow. Something that I did not notice in your EIS, was a study regarding if, indeed, there are native animals (aquatic and feathered) which reside in this area of conservation land that you plan to get changed to urban zoning. It would be a sad thing if you crushed trees that could possibly have the nest of a pueo living in it. By the way, these birds are an endangered species. I can't prove it because I have never been able to capture it on film, but myself and my husband and several other people in the neighborhood have seen what appears to be a lone pueo nesting in the area just across from my home.

You say in your EIS on page 7-3 that you will develop an agreement that.....ensures access to these sites. Shortly after our first community meeting with you and your constituents, several "No Trespassing" signs went up at the end of Lipalu street – right where the only public access is to get to the archeological sites and to the ferns. What that told me, is that your words are all blank face empty promises. I don't believe that we will have full "long-term access" and that your proposed action "will not have a cumulative negative impact on traditional customs and practices".

It will have a negative long term impact on my ability to practice my gathering rights as a native Hawaiian and dancer and it will have a negative long term impact on the environment and traffic and drainage. It will have a negative impact on my ability to visit a culturally significant historical site by myself, with my halau, and with my children and their children.



October 8, 2008

Lianne Mahealani Ching  
45-431 Ohaha Street  
Kāne'ohe, HI 96744

Dear Ms. Ching:

**Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i**



Thank you for your letter dated July 23, 2008 providing comments on the Draft Environmental Impact Statement (EIS) above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I appreciate receiving a copy of the draft and I also appreciate your efforts in keeping things open to discussion and sharing.  
Response: Thank you for your comment.
2. Given the choice as far as which alternative to choose (as presented in section 8.0 in the draft), I would choose "No Action". The reason?— increase in runoff into our streams and bay, killing and devastation of our forest and green hillside, worsening of an already existing drainage problem, and desecration of my ancestor's lands.  
Response: We note your support of the No Action Alternative.
3. I am especially insulted by the fact that you continue to ignore the importance of leaving the land and historical sites as they lay. The land will be spoiled and touched by non-Native Hawaiian people who have no clue of how special this place is.  
Response: As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the

historic sites in the vicinity of the Kawa'ewa'e Heiau are part of a complex of cultural sites, not discrete sites. The heiau complex will be protected and seen in relationship to other sacred sites in the Kō'olau Poko District. In this context, Hawaiian Memorial Park (HMP) will establish a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant.

4. As noted in the EIS, there are at least 12 significant archaeological sites noted within or near the petition site including a luakini heiau which are not commonly found - Kawaewae Heiau. In addition, there may be two other heiaus as well as dwelling sites located on this hillside that you want to expand your graveyard on.

Response: Please see response to Question #3 above for discussion of the new cultural preserve. At this time, Kawa'ewa'e Heiau is the only known heiau in the area. Our archaeological consultants, Cultural Surveys Hawai'i, believe Sites 6930 and 6931 are ceremonial in nature but have no definitive evidence they were heiau. Subsequent to land use approvals, we are required to prepare an Archaeological Preservation Plan. All of the issues related to access and the cultural preserve will be dealt with in this plan. The landowner is committed to working with cultural groups in the region to determine the elements of the Preservation Plan and ultimately, the Preservation Plan must be approved by State Historic Preservation Division.

5. In this same area grows some of the most green and sweet smelling laua'e ferns that I have ever seen. The lush green trees in this area protect these ferns from the sunlight during the day thus allowing it to stay green and fragrant. Being of Native Hawaiian descent and a practitioner of the art of hula, this spot to pick ferns for our adornment for hula is very accessible for my halau and other halau in the area. It is an important part of being a dancer. It has extra special significance in that it is near so many culturally important historical sites. There are not very many places that have such beautiful dark green laua'e AND that is accessible for dancers to get to.

Response: The landowner is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point, in time, we have been unsuccessful with our attempts to have groups come forward and identify where they are gathering laua'e. Therefore, we instructed our Botanical consultant to perform an additional site visit in August 2008 to identify areas where the laua'e

fern communities are abundant. The results of her work have been incorporated into the cultural preserve.

6. The loss of the trees and natural foliage in this area will mean more noise, less likely native birds and plants, strong possibility of landslides and flooding, and no shade and moisture for the beautiful lau'e ferns to continue to grow. Something that I did not notice in your EIS, was a study regarding if, indeed, there are native animals (aquatic and feathered) which reside in this area of conservation land that you plan to get changed to urban zoning. It would be a sad thing if you crushed trees that could possibly have the nest of a pueo living in it.

Response: Although the vegetative habitat that dominates the Petition Area is appealing, the area is almost completely devoid of native Hawaiian plants. As discussed in detail in Section 4.7 of the EIS, Flora, the existing vegetation found in the Petition Area is characterized by the alteration of native plant habitat. According to a system of eco-types to describe local flora, the Petition Area is a highly disturbed Schefflera/Java Plum Forest, whose trees are non-native, fast growing, invasive species. Of the 98 plant species observed during the botanical resources assessment for the project, 86% are alien or introduced. Only six species are Polynesian introductions; six species are indigenous, and two are endemic.

An avifauna and feral mammal survey of the Petition Area was conducted for the project in 2006 by Phillip Bruner. The findings of this report were summarized in Section 4.8 of the Draft EIS, Fauna, and the complete report was attached as Appendix E. The proposed action is not expected to significantly impact the fauna found on the Petition Area. The second growth forest of the Petition Area provides habitat for a variety of alien birds and mammals, none of which are threatened or endangered. No native land birds were recorded during the avifauna and feral mammal survey of the Petition Area. No Federal threatened or endangered species, or species of concern were observed on the Petition Area.

As noted in the EIS, the short-eared Owl or *Pueo* (*Asio flammeus sandwicensis*) was not recorded during the avifauna and feral mammal survey of the Petition Area. The EIS also notes that it is possible *pueo* could occasionally forage in the area as it forages in grasslands, agricultural fields, and pastures as well as in upland forested habitat. The revegetation of 11.4 acres with a plant palette dominated by native and Polynesian-introduced plants could provide habitat for a number of avian species including the O'ahu 'amakihi, and *pueo*. In addition, the

landscape plan for the project includes over 300 new trees to be planted throughout the new cemetery.

The slope stability analysis performed for the project and included as Appendix B, determined that there is no apparent potential for hazards associated with slope stability.

We want you to know that we are aware of the flooding concerns in your neighborhood, and the design of the project will incorporate features to prevent the development from increasing your exposure to these events. Retention areas are the preferred method to control storm water runoff. The retention areas hold storm water and allow sediment to settle before water slowly percolates into the soil or evaporates. The City and County of Honolulu Department of Planning and Permitting Rules relating to Storm Drainage Standards of January 2000 require that projects shall retain on-site any increase in runoff created by the proposed project for the county design storm event (which is the 10-year 1-hour storm).

A noise analysis for the Proposed Action was conducted in August 2008 by D.L. Adams Associates, and their findings have been incorporated in Section 4.12 of the Final EIS, and summarized in the paragraphs below.

Temporary short-term construction-period noise impacts are expected due to the operation of heavy equipment and trucks. During construction, contractors will be required to comply with the State Department of Health (DOH) noise regulations to minimize such impacts. Potential noise impacts to nearby residences during construction will be minimized with appropriate measures, such as appropriate scheduling of construction activities, installing mufflers on construction equipment and vehicles with exhaust systems, use of properly tuned and balanced machines, temporary noise barriers, and/or time of day usage limits for certain kinds of construction activities. Construction activities that emit noise in excess of the maximum permissible sound levels established by DOH must obtain a permit from DOH. No blasting will occur during the development of the Petition Area.

Long term noise impacts associated with the operation of the cemetery will be negligible, as traffic will only increase marginally. The traffic noise along the primary roads of Kaneohe Bay Drive and Kamehameha Highway are likely to have a very minimal effect (approximately less than a one (1) decibel increase in noise level) due to the project. Existing and future vegetation and topographic

features provide additional natural barriers to further absorb and screen possible noise emissions.

Please refer to the answer to Question #3 above for a discussion of the cultural preserve to be incorporated as part of project.

7. You say in your EIS on page 7-3 that you will develop an agreement that ensures access to these sites. Shortly after our first community meeting with you and your constituents, several "No Trespassing" signs went up at the end of Lipalu street — right where the only public access is to get to the archeological sites and to the ferns. What that told me, is that your words are all blank face empty promises. I don't believe that we will have full "long-term access" and that your proposed action "will not have a cumulative negative impact on traditional customs and practices".

Response: Please see response to Question #5 above.

8. Project will have a negative long term impact on the environment and traffic and drainage. It will have a negative impact on my ability to visit a culturally significant historical site by myself, with my halau, and with my children and their children.

Response: Chapter 10 of the EIS discusses long term impacts from the Proposed Action. Please refer to the answers to Questions #3 and #5 above for discussion of the cultural preserve area to be included in the project. We hope this will enable you and future generations to visit the cultural significant sites in the area.

As discussed in detail in Section 6.1 of the Draft EIS, Transportation, traffic conditions and impacts were analyzed as part of the Traffic Impact Analysis Study (included as Appendix H). Level of Service (LOS) conditions, which are rated from A to F (best to worst), were computed for all intersections studied near the Petition Area. LOS represents a qualitative measure of traffic operating conditions, and considers speed, travel time, freedom to maneuver, types of traffic controls, and interruptions as well as driver comfort and convenience. The LOS conditions for the intersections studied near the Petition Area are expected to be the same in the future with or without the project. In this regard, we want to let you know that HMP has modified the development program for the project by eliminating the 20-lot residential subdivision and the Lipalu Street extension that

would have served those lots. Consequently, there are expected to be no impacts from traffic through your immediate neighborhood.

9. I respectfully ask you to stop any further plans for development of this hillside. It is one of the last remaining green areas in Kaneohe that the community can access and utilize for cultural practices and recreation. It is an important watershed for the environment and may possibly be a habitat for several native species of birds or fishes.

Response: We note your opposition to the Proposed Action.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

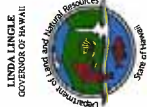
Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



LINDA LINGLE  
GOVERNOR OF HAWAII

LAURA H. THILEN  
BOARD OF LAND AND NATURAL RESOURCES  
COMMISSIONER OF WATER RESOURCES MANAGEMENT

ROBERTA M. WELLMAN  
DIRECTOR

KEVIN K. KAMAHARA  
DEPUTY DIRECTOR - WATER

SEATING AND OCEAN RESOURCES  
COMMISSIONER OF WATER RESOURCES MANAGEMENT  
CONSERVATION AND RESOURCES DEPARTMENT

FORESTRY AND WILDLIFE  
COMMISSIONER OF WATER RESOURCES MANAGEMENT

KAPOLUANE RELATED RESERVE COMMISSION  
STATE PARKS

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707

July 24, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

LOG NO: 2008.2304  
DOC NO: 0807LM13  
Archaeology

Dear Mr. Morford:

**SUBJECT: Chapter 6E-42 Historic Preservation Review –  
Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
Kāneʻohe Ahupuaʻa, Kōʻolaupoko District, Island of Oʻahu  
TMK: (1) 4-5-933:001 por. 001**

Thank you for the opportunity to comment on the aforementioned Draft Environmental Impact Statement (DEIS) with proposed zoning change and associated residential development project, which we received on June 9, 2008. The proposed subject action consists of the reclassification of approximately 56.6 acres from the State Land Use Conservation District to Urban District, in order to provide for cemetery expansion and the development of a 20 lot residential subdivision. At this time we **do not concur** with the proposed action as it is presented in the Draft Environmental Impact Statement. A complex of significant historic properties exists in the central portion of the project proposed for zoning and land use change. As proposed the projects planned roads and restrooms will adversely impact the historic complex. Alternatives No Action, II and III (1-9) are preferable as they could potentially provide for the preservation of this historic landscape within the conservation zoning.

The Archaeological Inventory Survey (McCurdy and Hammatt 2008), used for the preparation of the DEIS for the subject property is currently under review by our office. A preliminary review of the survey finds it does not contain sufficient information at this time, to implement the project as it is proposed. The adequacy of this report will be addressed in a separate letter. However, preliminary review of the inventory survey and a follow up field investigation of the property have confirmed the existence of multiple sites of cultural and archaeological significance which qualify for both the National and State Register of Historic Places. These sites are located within and directly adjacent to the subject parcel. This complex of sites presents a unique example of a cultural landscape associated with Kawa ʻewa e Heiau as the features are aligned along the same geographic feature (ridge). It is also a unique example of extant historic properties that does not exist in other parts of Windward Oʻahu. At this time we **do not concur** with the proposed preservation measures (McCurdy and Hammatt 2008). We believe that the complex of sites should be preserved as a cultural landscape that includes this newly identified corridor of Pre-contact ceremonial and habitation sites.

Additionally the Cultural Impact Assessment (Cultural Surveys Hawaii 2008) states that a number of cultural experts believe that there are 'a significant number of iwi kūpuna (ancestral remains) contained within the project area'. Numerous archaeological studies have identified that burial sites are often

Mr. Morford  
Page 2

associated with religious and habitation sites. This is another concern if the project were to be implemented as proposed.

Conservation district lands were established for the purpose of preserving significant historic and cultural resources within the environment to secure and sustain a certain quality of life and sense of place for the present population and for future generations. To reclassify this particular area as urban conflicts with the intent of preservation reserved for conservation lands as established by the Hawai'i State Plan Chapter 226, HRS. Section 226-12 HRS Objective and policies for the physical environment...in relation to 'historic resources' clearly states its intent to 226-12(b)(1)'Promote the preservation and restoration of significant historic resources' and 226-12(b)(4) 'Promote those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage'. The implementation of the Hawai'i State Plan provides unique opportunities to preserve and protect significant historic and cultural site complexes such as the sites identified within the proposed project area.

The Kōʻolaupoko Sustainable Communities Plan also emphasizes the need to 'protect' the communities natural and cultural resources. Key elements of the plan call for preserving and promoting open spaces throughout the region, and preserving and enhancing cultural features that define Kōʻolaupoko's sense of place. The complex identified within the subject parcel is an excellent opportunity to conform to the plan and provide for the preservation of this complex, which is a unique and important resource representative of past lifeways and religious/ceremonial activities in Pre-contact Hawai'i.

Please contact Lauren Morawski (O'ahu Archaeologist) at (808) 692-8015 if you have any questions or concerns regarding this letter.

Aloha,  
  
Puaʻaloalanni Aiu, PhD, Administrator  
State Historic Preservation Division

LM

Cc: Orlando Davidson: Land Use Commission P.O. Box 2359, Honolulu HI 96804  
Rachel Edinger: Helber, Hastert & Fee 733 Bishop St., Suite 2590, Honolulu HI 96813  
Grant Yoshimuri: 45-464 Lipalu St., Kaneʻohe, HI 96744

October 8, 2008

Puaalaokalani Aiu, Ph.D.  
Administrator  
State of Hawaii  
Department of Land and Natural Resources  
State Historic Preservation Division  
301 Kamokila Blvd, Room 555  
Kapolei, HI 96707

Dear Dr. Aiu:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 24, 2008 (0807LM13) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We do not concur with the Proposed Action as it is presented in the Draft Environmental Impact Statement. A complex of significant historic properties exists in the central portion of the project proposed for zoning and land use change. As proposed the projects planned roads and restrooms will adversely impact the historic complex. Alternatives II and III are preferable as they could potentially provide for the preservation of this historic landscape within the conservation zoning.

Response: We note that you do not concur with the Proposed Action presented in the Draft EIS. At this time, we want to inform you that the Petitioner will modify the project development program by adopting Alternative III, "Cemetery Only" as the Proposed Action, and will amend the Petition for boundary amendment accordingly.

As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural



sites, not a discrete site. As such, we also want to inform you that the project development program will be modified in another important manner; a 9.4-acre cultural preserve will be established that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. In addition, the cultural preserve will include areas where the laua'e fern is plentiful, to provide a supply of these plants for practitioners.

2. The Archaeological Inventory Survey used for the preparation of the DEIS is currently under review by our office. A preliminary review of the inventory survey finds it does not contain sufficient information at this time to implement the project as it is proposed. Preliminary review of the survey has confirmed the existence of multiple sites of cultural and archaeological significance which qualify for both the National and State Register of Historic Places. These sites are located within and directly adjacent to the subject parcel. This complex present a unique example of a cultural landscape associated with Kawa'ewa'e Heiau as the features are aligned along the same geographic ridge. It is also a unique example of extant historic properties that does not exist in other parts of Windward O'ahu. At this time we do not concur with the proposed preservation measures. We believe the complex of sites should be preserved as a cultural landscape that includes the newly identified corridor of Pre-contact ceremonial and habitation sites.

Response: Please refer to the answer to Question #1 above for a discussion of the preferred alternative and the cultural preserve area to be created.

3. Additionally the Cultural Impact Assessment states that a number of cultural experts believe that there are a significant number of *iwi* kipuna contained within the project area. Numerous archaeological studies have identified that burial sites are often associated with religious and habitation sites. This is another concern if the project were to be implemented as proposed.

Response: No human burials have been documented within the Petition Area, and CIA contributors did not specifically mention knowledge of *iwi* *kīpuna* in the area although they did express concern that they *could* be there. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and

the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. The creation of the 9.4-acre cultural preserve will further protect the area where most of the cultural sites are located.

4. Conservation district lands were established for the purpose of preserving significant historic and cultural resources within the environment to secure and sustain a certain quality of life and sense of place for the present population and future generations. To reclassify this particular area as urban conflicts with the intent of preservation reserved for conservation lands as established by the Hawai'i State Plan Chapter 226, HRS. Section 226-12 HRS Objectives and policies for the physical environment- in relation to 'historic resources' clearly states its intent to 226-12-(b) (1) 'Promote the preservation and restoration of significant historic resources' and 226-12(b)(4) 'Promote those special areas, structures, and elements that are an integral and functional part of Hawai'i's ethnic and cultural heritage'. The implementation of the Hawai'i State Plan provides unique opportunities to preserve and protect significant historic and cultural sites complexes such as the sites identified within the proposed project area.

Response: Section 3.2.1 of the EIS discusses conformance with the Hawai'i State Plan.

5. The Ko'olaupoko Sustainable Communities Plan also emphasizes the need to 'protect' the communities natural and cultural resources. Key elements of the plan call for preserving and promoting open spaces throughout the region, and preserving and enhancing cultural features that define Ko'olaupoko's sense of place. The complex identified within the subject parcel is an excellent opportunity to conform to the plan and provide for the preservation of this complex, which is a unique and important resource representative of past lifeways and religious/ceremonial activities in Pre-contact Hawai'i.

Response: As discussed in the EIS, the Petitioner understands that the project is not in conformance with the existing Ko'olau Poko Sustainable Communities Plan (SCP), and the project will require an amendment to the Ko'olau Poko SCP. Section 3.2.2. Ko'olau Poko SCP, of the EIS explains the conformance with the SCP and potential options for this amendment. As discussed in the answer to Question #1 above, the

preferred alternative includes a cultural preserve that will allow for complete preservation of the complex of sites as you suggest should be done in your letter. Additionally, the cemetery expansion will continue to contribute to the open spaces of the region.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
Grant Yoshimori

July 28, 2008

Mr. Jay Morford  
General Manager  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Aloha, I thank you for this opportunity in which to comment on the DEIS for the Hawaiian Memorial Park Cemetery Expansion. My name is LJ Moana Lee. I am an archeologist and am currently employed by the University of Hawaii, as a contractor to the US Army. I live in Kahala'u.

I would like to make a few comments on the "Archeological Inventory Survey for the Hawaiian Memorial Park Expansion" which is located in the appendices of the DEIS. I would offer that over all, it is informational and well written. However the lack of information gathered in the field does limit the interpretation and allows for false boundaries and insufficient buffer zones. It is more realistic to look at the landscape and discuss each site as it would have an impact on each of the individuals living in the area at the time of its use. In other words, all of the individual sites should be taken as a complex, much as we would look at a village and each entity (house, barn, store, church, etc.) is a feature within that complex. It should all be considered a complex because it is understood that each entity or feature does not exist in a vacuum.

As stated in the beginning of the Introduction, 1.1 Project Background, this report was conducted at the request of the developer. The bias of the report is already an issue as methodologies are being designed solely for the purpose of accommodating development of the land. Then because of lack of information each feature is given a site number and development is allowed between each feature. I would suggest that sites -6931 and -6930 and sites 354 and -4684 be two larger sites and that the boundary of the quarry be extended at least 250 feet more to the west.

The method of arbitrarily drawing boundaries around archeological sites has been addressed by many Hawaiian hui(s) as well as other archeologists. The problem arises when we do not have enough information about the cultural landscape in an area. First, one must know that any landscape is the result of the cultural decision of how land use is dictated. The failure to heed this tenet gives us the artificial boundaries that are now identified in this report. If you don't know how land use is dictated, how do you know where to look for evidence?

At this time, I would like to address the conceptual maps prepared for the cemetery expansion. It is not important which map, for the archeological sites are treated the same in each of these maps, i.e. independent entities unassociated with each other. This again is an artifact of the failure to gather enough information from which to understand the cultural landscape and therefore expand the boundaries of each feature until you find the possibility that the use of each feature actually overlaps.

I have been to all of the sites and I was one of the first to discover the quarry. The boundary that is drawn around the quarry is much too small. The boundary should extend another 200 to 250 meters west. The quarry is along and within an intermittent drainage. The drainage does not just stop but continues much farther west. The latter part of the drainage is also buried beneath lots of debris. Upon walking toward the houses, there were still many flakes and hammer stones on the surface. The survey is inadequate in the way that there were no excavations done to understand the depth and breadth of the

quarry as it extended into the drainage. None of the work that has been performed at any of the sites justifies the drawing of the boundaries.

Two important pieces of information are not included in the report. The first is the use of the natural dike as the source of the raw material. Two areas of the natural dike are exposed for exploitation. Investigation of the dikes shows areas in which material has been broken off for the use of tool making. One of the exposed dikes is wholly within the drainage. The second is that there were collections of debitage or flakes as well as hammer stones in the drainage. This makes the drainage itself an important part of the quarry. The material within the drainage is then spread a considerable ways down stream thus extending the boundary much farther than now drawn.

The separate treatment of numbers 6930 and 6931 illustrates how the lack of information gathering affects the way the site is interpreted and thus arbitrary boundaries are drawn. Both sites are given a function of ceremonial. The description of 6931 states, "The intermittent drainages that border -6931 to the north and south also border -6930. Clear of ... vegetation there would be a commanding view of -6930 and Kawa'ewa'e Heiau from Feature D." The relationship between all structures are intertwined, but clearly the physical relationship between -6930 and -6931 warrants more investigation than just a perfunctory surface survey. If not more thoroughly investigated then one large boundary should encompass all structures within -6930 and -6931. This should be based on the higher probability that since the two structures are related in function they also function as one unit. Although upslope and 250 ft apart, they are still within the same physical geographical structure, namely the drainages that border both sites to the north and south.

Sites 354 and 4684 may also have a relationship that is not properly investigated. It is stated in the report that 4684 is a habitation complex with enclosures and terracing. It measures 25m x 21m (81 ft x 68 ft) quite a substantial size. Such habitation structures are many times associated with heiau as support structures. These structures serve many purposes, most notably as the Konoiki of the area or presiding priest of the heiau. It is not unusual for a habitation area to be one of the features within a heiau complex.

The development of this site also concerns me because it is the last remnant of Hawaiian sites in a natural setting in Kane'oh'e for many miles around. There are other sites, but they are not as readily accessible to the public as these are. Inadequate study and subsequent development of the sites will destroy the integrity of the cultural landscape. The sites will not be preserved with all of the Hawaiian character intact. Again, we will have piece meal representation of the Hawaiian lifestyle rather than a larger vestige of the cultural landscape. Just because it has been disturbed, it is not a reason to let all of it go. Rather, the more integrity that we can attribute to a site the more we can learn about our past.

Sincerely,



Moana Lee  
47-681L Lamaula Rd.  
Kaneohe, HI 96744

cc: Office of Environmental Quality Control  
Land Use Commission, State of Hawaii  
Helber Hastert and Fee Planners

October 8, 2008

LJ Moana Lee  
47-681L Laniaula Rd.  
Kaneohe, HI 96744

Dear Ms. Moana Lee:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii

Thank you for your letter dated July 28, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. I would offer that over all, it is informational and well written. However the lack of information gathered in the field does limit the interpretation and allows for false boundaries and insufficient buffer zones. It is more realistic to look at the landscape and discuss each site as it would have an impact on each of the individuals living in the area at the time of its use. In other words, all of the individual sites should be taken as a complex, much as we would look at a village and each entity (house, barn, store, church, etc.) is a feature within that complex. It should all be considered a complex because it is understood that each entity or feature does not exist in a vacuum.

Response: The statements about these sites being part of a whole complex are well taken. However, detailed further study to determine whether the sites are contemporaneous would be required. These sites are indeed a component of the present landscape, but whether they were in use at the same time in an integrated community is yet to be determined and would require extensive further study in addition to that included in the scope for the inventory survey.

As noted in the Draft EIS, the Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes



recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this context, Hawaiian Memorial Park (HMP) has modified the project development program to create a 9.4-acre cultural preserve area that encompasses five archaeological sites within the Petition Area between the Kawa'ewa'e Heiau and Site 6931. This culture preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. This preserve area will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

2. The bias of the report is already an issue as methodologies are being designed solely for the purpose of accommodating development of the land.

Response: Cultural Surveys Hawaii (CSH) did conduct this study at the request of Helber Hastert & Fee, on behalf of the landowner. These studies are required as a part of any land entitlements in Hawaii and the scope and content of these reports are reviewed and approved by the State Historic Preservation Division of Department of Land and Natural Resources.

3. Then because of lack of information each feature is given a site number and development is allowed between each feature. I would suggest that sites -6931 and -6930 and sites 354 and -4684 be two larger sites and that the boundary of the quarry be extended at least 250 feet more to the west.

Response: Development will not occur between the archaeological features that have been found to be significant. Please refer to the response to Question #1 for a discussion of the cultural preserve that will be established.

There is a suggestion that the quarry site extends further than is shown in the AIS. The actual quarry was easily defined. However the scatter of debris associated with the quarrying activities is more difficult to define. The quarry area itself is outside of the Petition Area to the east. Hallett H. Hammatt of CSH visited Site 6929 in September 2008 to re-examine the site. CSH examined the drainage to the west down slope of the site as well as the adjacent slopes and did not observe evidence of human modification of basalt rocks except within a few meters of the present site boundaries. Following the drainage down slope beyond the site



boundaries. CSH observed flaked stones which are believed to be products of natural breakage and not human activity. CSH is of the opinion that they accurately portrayed the boundaries of the site in the archaeological report and included site map. There are a few flakes outside these boundaries within a meter or so of the site as portrayed and described, but these do not occur to an extent which would justify expanding the site boundaries.

4. The method of arbitrarily drawing boundaries around archeological sites has been addressed by many Hawaiian hui(s) as well as other archeologists. The problem arises when we do not have enough information about the cultural landscape in an area. First, one must know that any landscape is the result of the cultural decision of how land use is dictated. The failure to heed this tenet gives us the artificial boundaries that are now identified in this report. If you don't know how land use is dictated, how do you know where to look for evidence?

Response: We are assuming that the reference to false boundaries refers to the definition and delineation of the outer perimeters of the archeological sites. Since these sites are predominately defined by the surface architecture, the archeologists have used the outer extent of this architecture to define the site boundaries. Cultural layers associated with this architecture may or may not extend beyond the determined boundaries of the above ground portions of the sites. Extensive testing in accordance with a sampling design would be required to determine the presence or absence of these subsurface layers. This testing was not in the scope of the inventory survey.

It has been Cultural Surveys' experience as archeologists that cultural layers in this type of upland sloping terrain (as opposed to coastal or floodplain environments) are generally associated with surface indications of that occupation such as surface architecture, midden, and artifact scatters or stone alignments.

5. At this time, I would like to address the conceptual maps prepared for the cemetery expansion. It is not important which map, for the archeological sites are treated the same in each of these maps, i.e. independent entities unassociated with each other. This again is an artifact of the failure to gather enough information from which to understand the cultural landscape and therefore expand the boundaries of each feature until you find the possibility that the use of each feature actually overlaps.

Response: The study conducted was an inventory survey, the purpose of which is to record all sites, evaluate significance, and determine general treatment according to HAR 13 Chapter 276 governing archaeological inventory surveys. The determination of buffer zones is generally undertaken in later phases of work such as preservation plans. Also, please see response to Question #4 above.

6. The boundary that is drawn around the quarry is much too small. The boundary should extend another 200 to 250 meters west. The quarry is along and within an intermittent drainage. The drainage does not just stop but continues much farther west. The latter part of the drainage is also buried beneath lots of debris. Upon walking toward the houses, there were still many flakes and hammer stones on the surface. The survey is inadequate in the way that there were no excavations done to understand the depth and breadth of the quarry as it extended into the drainage. None of the work that has been performed at any of the sites justifies the drawings of the boundaries.

Response: Please refer to the response to Question #3 above for a discussion of the Quarry. The study conducted is an inventory survey the purpose of which is to record all sites, evaluate significance and determine general treatment according to HAR13 Chapter 276 governing archaeological inventory surveys. The determination of buffer zones is generally undertaken in later phases of work such as preservation plans. In this case, buffer zones will be an approximately nine-acre cultural preserve.

7. Two important pieces of information are not included in the report. The first is the use of the natural dike as the source of the raw material. Two areas of the natural dike are exposed for exploitation. Investigation of the dikes shows areas in which material has been broken off for the use of tool making. One of the exposed dikes is wholly within the drainage. The second is that there were collections of debitage or flakes as well as hammer stones in the drainage. This makes the drainage itself an important part of the quarry. The material within the drainage is then spread a considerable ways down stream thus extending the boundary much farther than now drawn.

Response: Please refer to the answer to Question #3 above.

8. The description of 6931 states, "The intermittent drainages that border -6931 to the north and south also border -6930. Clear of vegetation there would be a commanding view of -6930 and Kawa'ewa'e Heiau from Feature D." The relationship between all structures are intimated, but clearly the physical relationship between -6930 and -6931 warrants more investigation than just a perfunctory surface survey. If not more thoroughly investigated then one large boundary should encompass all structures within -6930 and -6931. This should be based on the higher probability that since the two structures are related in function they also function as one unit. Although upslope and 250 ft apart, they are still within the same physical geographical structure, namely the drainages that border both sites to the north and south.

Response: Please see response to Question #1 and discussion of the cultural preserve that will be established.

9. Sites 354 and 4684 may also have a relationship that is not properly investigated. It is stated in the report that 4684 is a habitation complex with enclosures and terracing. It measures 25m x 21m (81 ft x 68 ft) quite a substantial size. Such habitation structures are many times associated with heiau as support structures. These structures serve many purposes, most notably as the Konohiki of the area or presiding priest of the heiau. It is not unusual for a habitation area to be one of the features within a heiau complex.

Response: Please refer to the response to Question #1 and the establishment of the cultural preserve.

10. The development of this site also concerns me because it is the last remnant of Hawaiian sites in a natural setting in Kane'one for many miles around. There are other sites, but they are not as readily accessible to the public as these are. Inadequate study and subsequent development of the sites will destroy the integrity of the cultural landscape. The sites will not be preserved with all of the Hawaiian character intact.

Response: Please see response to Question #1 and discussion of the cultural preserve that will be established.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

LINDA LINGLE  
GOVERNOR



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

July 28, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, Hawaii 96813

Dear Mr. Morford:

Subject: Hawaiian Memorial Park Cemetery Expansion  
Draft Environmental Impact Statement (Draft EIS)  
TMK: 4-5-033: 001 por. 001

Thank you for requesting the State Department of Transportation's (DOT) review of the subject project.

The DOT Highways Division has not completed its review of the project's Traffic Impact Analysis Report (TIAR).

The DOT requests that your firm consult the Highways Division Planning Branch regarding the traffic mitigation measures presented in the Draft EIS and a statement in Section 6.1.1.2 on the need to signalize the cemetery's entrance intersection with Kamehameha Highway because of a LOS F condition.

The DOT appreciates the opportunity to provide its comments.

Very truly yours,

BRENNON T. MORIOKA, PH.D., P.E.  
Director of Transportation

c: Katherine Kealoha, Office of Environmental Quality Control  
Orlando "Dan" Davidson, Land Use Commission  
Rachael Edinger, Helber Hastert & Fee, Planners

BRENNON T. MORIOKA  
DIRECTOR

Deputy Directors  
MICHAEL O. FORNEY  
FRANCIS PALLI-KEMO  
BRANTH SENOIUCHI

IN REPLY REFER TO:

STP 8.2951

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Brennon T. Morioka, Ph.D., P.E.  
Director of Transportation  
869 Punchbowl St.  
Honolulu, HI 96813-5097

Dear Mr. Morioka:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ōhe, O'ahu, Hawai'i

Thank you for your letter dated July 28, 2008 (STP 8.2951) providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. The DOT Highways Division has not completed its review of the project's Traffic Impact Analysis Report (TIAR).

Response: We note that the Highways Division has not completed a review of the TIAR.

2. The DOT requests that your firm consult the Highways Division Planning Branch regarding the traffic mitigation measures presented in the Draft EIS and a statement in Section 6.1.1 on the need to signalize the cemetery's entrance intersection with Kamehameha Highway because of a LOS F condition.

Response: We have consulted with the Highways Division Planning Branch per your request. We will comply with your request that Hawaiian Memorial Park provide a traffic signal warrant study per your letter of September 18, 2008, once entitlements are granted, with particular details to be coordinated with your Traffic Branch.



Mr. Brennan T. Morioka  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
Page 2

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd  
Mike Green, Clark & Green Associates  
Orlando "Dan" Davidson, Land Use Commission  
Office of Environmental Quality Control



# KO'OLAUPOKO HAWAIIAN CIVIC CLUB

August 11, 2008

Mr. Jay Morford  
Hawaiian Memorial Park Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Subject: Re-Submittal of Comments on HMP Expansion

Dear Mr. Morford:

We are enclosing comments submitted to you earlier, but which were returned by the U.S. Postal Service due to some question about the mailing address.

Although this is long past the deadline for comment on your EIS, we ask that you consider our concerns among those you review for response in the final EIS on your project.

If you have any questions, please let us know.

Mahealani,



MAHEALANI CYPHER  
President

Enclosure

P. O. Box 664  
Kaneohe, HI 96744  
Ph. (808) 235-8111  
koolaupokohcc.org



# KO'OLAUPOKO HAWAIIAN CIVIC CLUB

July 31, 2008

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Subject: Draft Environmental Impact Statement  
for Hawaiian Memorial Park Expansion

Dear Mr. Morford:

E kalamai, our apologies for submitting these comments after your July 23<sup>rd</sup> due date. We waited to submit these comments to incorporate the mana'o on behalf of our Board of Directors.

1. We appreciate the efforts of Hawaiian Memorial Life Plan, Ltd., to contact our civic club and other Native Hawaiian practitioners or organizations here in Kane'ohe regarding the impact of your project upon the wahi kapu of Kawa'ewa'e. Please note, we consider the heiau to be a "kapu" site, in that there are likely to be iwi kupuna buried throughout the site. Moreover, we prefer there be no further digging within the complex so as to avoid inadvertent discovery of burials.
2. We wish to reiterate our concern that extension of Lipalu Street as presently planned in your project is extremely likely to disrupt and disturb a part of the heiau that may have been the gathering place for ancient Hawaiians bringing their petitions to the kahuna. In addition, we are also concerned about potential impacts of the road on other parts of the complex in the low area behind the walled structure of the heiau.
3. We noted that, in Section 5.5.3, "Mitigation", there is no indication that Hawaiian Memorial Life Plan, Ltd., intends to allow cultural access to Kawa'ewa'e Heiau either currently or any time in the future. This is a grave concern to us, as our members and others have visited and/or cared for the site for many years. It is an

Mr. Jay Morford  
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important part of our history and heritage, and vital to the perpetuation of our culture. We ask that this section be amended to incorporate language that assures continued access, under reasonable conditions, for Native Hawaiians and others who wish to honor and respect this wahi kapu.

Mahalo for this opportunity to share our mana'o.

Me kealoha pumehana,

MAHEALANI CYPHER  
President

P. O. Box 664  
Kaneohe, HI 96744  
Ph. (808) 235-8111  
koolaupokohcc.org

**Helber Hastert & Fee**  
*Planners, Inc.*

October 8, 2008

Mahealani Cypher  
President  
Ko olaupokō Hawaiian Civic Club  
P.O. Box 664  
Kaneohe, HI 96744

Dear Ms. Cypher:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāneʻohe, Oʻahu, Hawaiʻi

Thank you for your letter dated July 31, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. We appreciate the efforts of Hawaiian Memorial Life Plan, Ltd., to contact our civic club and other Native Hawaiian practitioners or organizations here in Kaneohe regarding the impact of your project upon the wahi kapu of Kawa'ewa'e. Please note, we consider the heiau to be a "kapu" site, in that there be no further digging within the complex so as to avoid inadvertent discovery of burials.

Response: No human burials have been documented within the Petition Area, and Cultural Impact Assessment contributors did not specifically mention knowledge of *wahi kūpuna* in the area. As noted in the EIS, those involved with the development activities in the Petition Area will be informed of the possibility of inadvertent cultural finds, including human remains. Should cultural or burial sites be identified during ground disturbance, all work will immediately cease, and the appropriate agencies will be notified pursuant to applicable law. Mandatory education programs will be provided to any entity or personnel working within the Petition Area to ensure that appropriate protective and notification action is undertaken should any cultural or archaeological finds take place. Cultural monitoring will be conducted during all phases of development activities. Access arrangements will be documented as part of the Preservation

Ms. Mahealani Cypher  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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Plan that will be prepared for the property at a later date. There will be minimal ground disturbance in the areas around the archaeological sites. Hawaiian Memorial Park (HMP) has decided to modify the project development program for the project by creating a 9.4-acre cultural preserve that encompasses five archaeological sites within the Petition Area east of Kawa'ewa'e Heiau. This cultural preserve will also include significant areas where the laua'e fern is found, to provide future supply for those who gather this plant. The preserve will remain intact, in its "natural" state except for a modest access road.

2. We wish to reiterate our concern that extension of Lipalu Street as presently planned in your project is extremely likely to disrupt and disturb a part of the heiau that may have been the gathering place for ancient Hawaiians bringing their petitions to the kahuna. In addition, we are also concerned about potential impacts of the road on other parts of the complex in the low area behind the walled structure of the heiau.

Response: The Petitioner will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the Cultural Impact Assessment to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the Kawa'ewa'e Heiau is part of a complex of cultural sites, not a discrete site. The heiau complex will be protected and seen in relationship to other sacred sites in the Ko'olau Poko District. In this regard, HMP will modify the project development program in a second important manner, and will eliminate the 20-lot residential subdivision and the Lipalu Street extension that was intended to service those lots.

3. We noted that, in Section 5.5.3, "Mitigation", there is no indication that Hawaiian Memorial Life Plan, Ltd., intends to allow cultural access to Kawa'ewa'e Heiau either currently or any time in the future. This is a grave concern to us, as our members and others have visited and/or cared for the site for many years. It is an important part of our history and heritage, and vital to the perpetuation of our culture. We ask that this section be amended to incorporate language that assures continued access, under reasonable conditions, for Native Hawaiians and others who wish to honor and respect this wahi kapu.

Response: Please refer to the answers to Questions #1 and 2 above for discussion of the new concept plan and the cultural preserve to be created. The landowner is clearly aware of the need to recognize traditional gathering rights on the property, and will accommodate continued access to the sites.

EIS



August 1, 2008

Ms. Mahealani Cyper  
Hawaiian Memorial Park Cemetery Expansion Project  
Draft Environmental Impact Statement  
October 8, 2008  
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We appreciate your participation in this review process, and we look forward to working with the Ko'olau Poko Hawaiian Civic Club to establish a long-term plan for the cultural preserve. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBERT HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission

Mr. Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

**Re: Hawaiian Memorial Park  
Cemetery Expansion  
Kāne'ohē, Ko'olau Poko, O'ahu  
TMK: (1) 4-5-033: por. 001**

Thank you for the opportunity to comment on the May 2008 DEIS of this project. HECO has no objections at this time. The following comments are from our Engineering and Construction & Maintenance Departments.

(1) Engineering/Transmission & Distribution (Hsun Jou, 543-7527). HECO currently has no existing facilities within the area of this project. We appreciate your efforts to keep us apprised of the planning process. As the project progresses, please continue to keep us informed. We will be better able to evaluate any effects on our system facilities further along in the project's development. We request that development plans show all affected HECO facilities and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.

Should it become necessary to relocate or redesign HECO's facilities, or to add new facilities, please submit a request in writing immediately upon that determination, and we will work with you so that construction of the project may proceed as smoothly as possible to minimize any delays in or impacts on the project schedule. HECO shall not be responsible for any delay or damage that may arise as a result of insufficient notice for relocation of our facilities. Please note that there may be costs associated with any relocation work, and that such costs may be borne by the requestor.

Mr. Jay Morford  
August 1, 2008  
Page Two

(2) Construction & Maintenance (Paul Nakagawa, 543-7062). Although it does not appear that HECO has facilities within the proposed project expansion area, if it is found and determined that any existing facilities will be directly impacted by this project, HECO will need continued access for operation and maintenance purposes. Should relocation of or additional facilities be required, a formal request should be submitted and coordinated through appropriate HECO departments.

To coordinate HECO's continuing input in this project, I suggest dealing directly with the points of contact noted above.

Sincerely,



Kirk S. Tomita  
Senior Environmental Scientist

cc: Mr. Laurence Lau (OEQC/DOH)  
Mr. Orlando Davidson (LUC)  
Ms. Rachael Edinger (Helbert, et al.)  
H. Jow/R. Tamayo/M. Lum  
P. Nakagawa

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Kirk S. Tomita  
Senior Environmental Scientist  
Hawaiian Electric Company  
PO Box 2750  
Honolulu, HI 96840-0001

Dear Mr. Tomita:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawai'i

Thank you for your letter dated August 1, 2008, providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. HECO has no objections at this time.  
Response: We note that you have no objections at this time.
2. HECO currently has no existing facilities within the area of this project. We request that development plans show all affected HECO facilities and address any conflicts between the proposed plans and HECO's existing facilities. Please forward the pre-final development plans to HECO for review.  
Response: The development plans for the project will show all affected HECO facilities and address any conflicts between the proposed plans and HECO's existing facilities. Pre-final development plans will be forwarded to HECO for review.
3. Should it become necessary to relocate or redesign HECO's facilities, or to add new facilities, please submit a request in writing immediately upon that determination, and we will work with you so that construction of the project may proceed as smoothly as possible to minimize any delays in or impacts on the project schedule. Please note that there may be costs associated with any relocation work, and that such costs may be borne by







LANA H. WHEELER  
GOVERNOR  
COMMISSIONER OF LAND AND NATURAL RESOURCES  
CONSERVATION DIVISION  
RUSSELL Y. TSUI  
KEN C. KAWAHARA  
DEPUTY DIRECTOR - WATER  
POLYMER SERVICES  
BUREAU OF COASTAL ZONES  
CONSERVATION AND COASTAL LANDS  
RESOURCES  
HISTORIC PRESERVATION  
RECREATION  
LAND  
NATURAL RESOURCES COMMISSION  
STATE PARKS

STATE OF HAWAII  
DEPARTMENT OF LAND AND NATURAL RESOURCES  
STATE HISTORIC PRESERVATION DIVISION  
601 KAMOKILA BOULEVARD, ROOM 555  
KAPOLEI, HAWAII 96707



Mr. Kirk Tomita  
Hawaiian Memorial Park Cemetery Expansion Project  
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October 8, 2008  
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the requestor.  
Response: Should it become necessary to relocate or redesign HECO's facilities, or to add new facilities, the Petitioner will submit a request in writing immediately upon that determination. The Petitioner also notes that there may be costs associated with any relocation work, and that such costs may be borne by the requestor.

4. Although it does not appear that HECO has facilities within the proposed project expansion area, if it is found and determined that any existing facilities will be directly impacted by this project, HECO will need continued access for operation and maintenance purposes. Should relocation of or additional facilities be required, a formal request should be submitted and coordinated through appropriate HECO departments.

Response: We note that if HECO facilities are found within the Petition Area, HECO will need access to them for operation and maintenance purposes. Also, if relocation of or additional facilities are required, a formal request should be submitted and coordinated through appropriate HECO departments.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,  
HELBER HASTERT & FEE, Planners

Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
Paul Nakagawa, HECO  
H. Jou/T. Tamayo/M. Lum, HECO

August 1, 2008

Jay Morford  
Hawaiian Memorial Life Plan, Ltd.  
1330 Maunakea Street  
Honolulu, HI 96813

Dear Mr. Morford:

**SUBJECT: Cultural Impact Assessment as part of the Draft Environmental Impact Statement for Hawaiian Memorial Park Expansion**  
**TMK: (1) 4-5-033:001 por. 001**

LOG NO: 2008.3318  
DOC NO: 0808KP01  
Culture

Thank you for the opportunity to comment on the Cultural Impact Assessment portion of the aforementioned plan. We have concerns regarding the recommendations provided.


On page 95, recommendation 1 is to preserve significant archaeological sites and to provide buffer zones around separate sites for protection. However, the question of the relationship between Kawa'ewa'e Heiau and the other sites has not been addressed. If the complex is contiguous in its inception, then the entire area needs to be preserved to protect the integrity of the site as a whole and the relationship of each site to Kawa'ewa'e Heiau.

Recommendation 3 addresses cultural properties to be investigated, preserved and protected by the creation of buffer zones upon recommendation of CSH. We recommend that you consult with cultural practitioners on the creation of buffer zones. Access for cultural practices at the Heiau and for the collection of plants or other resources traditionally taken from this area should be included in your preservation plan.

Recommendation 8 addresses the gathering of foliage for hula and lei making but does not recognize the importance of native plants for 'a'u lapa'au or medicinal purposes. Medicinal plants require an environment relatively free of pollutants and a practitioner would seek areas away from dense habitation, roadways and paths frequented by bikers. Conservation lands provide such resources as development or land altering disturbances in these areas are strictly enforced. The proposed rezoning from conservation would negatively impact resources that exist in the project area and result in the loss of these resources.

The project as proposed would negatively impact traditional Hawaiian cultural resources and sites that retain integrity of location and relationship. Sites of this type are rare on O'ahu and should be preserved if at all possible. We believe that your proposal, as it stands, will have a significant impact on an important cultural site and on cultural practices that occur in the area.

**Helber Hastert & Fee**  
*Planners, Inc.*

Sincerely,  
  
Puaaaloakalani Aiu, Ph.D.  
Administrator, State Historic Preservation Division

October 8, 2008

Puaaaloakalani Aiu, Ph.D.  
Administrator  
State of Hawaii  
Department of Land and Natural Resources  
State Historic Preservation Division  
301 Kamokila Blvd, Room 555  
Kapolei, HI 96707



Dear Dr. Aiu:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated August 1, 2008 (0808KP01) providing comments on the Cultural Impact Assessment (CIA) as part of the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. On page 95, recommendation 1 is to preserve significant archaeological sites and to provide buffer zones around separate sites for protection. However, the question of the relationship between Kawa'ewa'e Heiau and the other sites has not been addressed. If the complex is contiguous in its inception, then the entire area needs to be preserved to protect the integrity of the site as a whole and the relationship of each site to Kawa'ewa'e Heiau.

Response: The statements about these sites being part of a whole complex are well taken. As noted in the Draft EIS, HMP will follow all mitigation measures as recommended by both the Archaeological Inventory Survey and the CIA to address potential adverse impacts on Hawaiian cultural beliefs, practices, and resources. This includes recognition that the historic sites in the vicinity of the Kawa'ewa'e Heiau are part of a complex of cultural sites, not discrete sites. The heiau complex will be protected with the cultural preserve described above, and seen in relationship to other sacred sites in the Ko'olau Poko District.

In this context, we would like to let you know that Hawaiian Memorial Park (HMP) has decided to modify the project development program in two significant ways:  
(1) the 20-lot residential subdivision and the Lipalu Street extension intended to

service those lots will be eliminated; and (2) a 9.4-acre cultural preserve will be established that encompasses five archaeological sites within the Petition Area east of the Kawawa'e Heiau (Sites -4683, -4684, -6930, -6932, and -6933). This cultural preserve will also include areas where the *laua'e* fern is plentiful, to provide future supply for those who gather this plant, and will be designed in careful consideration of site boundaries and in relationship to contiguous sites.

2. Recommendation 3 addresses cultural properties to be investigated, preserved and protected by the creation of buffer zones upon recommendation of CSH. We recommend that you consult with cultural practitioners on the creation of buffer zones. Access for cultural practices at the heiau and for the collection of plants or other resources traditionally taken from this area should be included in your preservation plan.

Response: Please refer to the answer to Question #1 above for a description of the cultural preserve that will be incorporated as part of the Proposed Action. Additionally, we note and agree with your recommendation to consult with cultural practitioners to ensure that the cultural preserve created for the Petition Area adequately protects the significant archaeological sites and related cultural practices. Access arrangements will be documented as part of the Preservation Plan that will be prepared for the property at a later date.

3. Recommendation 8 addresses the gathering of foliage for hula and lei making but does not recognize the importance of native plants for *laua'au* or medicinal purposes. Medicinal plants require an environment relatively free of pollutants and a practitioner would seek areas away from dense habitation, roadways and paths frequented by hikers. Conservation lands provide such resources as development or land altering disturbances in these areas are strictly enforced. The proposed rezoning from conservation would negatively impact resources that exist in the project area and result in the loss of these resources.

Response: We are basing our plans for protection and preservation of the archaeological sites and cultural practices that occur on the Petition Area on both the results of the CIA and other consultation with cultural practitioners. The Petitioner is clearly aware of the need to recognize traditional gathering rights on the property. Up to this point in time, the CIA consultation did not yield any documentation that medicinal gathering is practiced within the Petition Area, and the Botanical Survey indicated a very low number and percentage of native plants present. In regard to the *laua'e*, we have been unsuccessful with our attempts to have groups come forward and identify where they are gathering

*laua'e*. The locations of the *laua'e* communities were identified during additional field work for the EIS in an addendum to the Botanical Survey prepared for this project. As discussed in the answer to Question #1 above, we have revised the project Proposed Action and EIS to incorporate a cultural preserve area that will include areas where *laua'e* is plentiful.

4. The project as proposed would negatively impact traditional Hawaiian cultural resources and sites that retain integrity of location and relationship. Sites of this type are rare on O'ahu and should be preserved if at all possible. We believe that your proposal, as it stands, will have a significant impact on an important cultural site and on cultural practices that occur in the area.

Response: It is our intention to not have a significant impact on the important cultural sites and practices that occur in the area, and, as noted above, the development program for the project has been modified to ensure this is true. The Petitioner has concluded through the EIS analysis that Alternative II, "Cemetery Only", is the preferred alternative and will be the project for which approval is sought by the State Land Use Commission.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission  
Grant Yoshimori  
Doug Borthwick, Cultural Surveys Hawaii

August 22, 2008

Jay Morford, General Manager  
Hawaiian Memorial Park  
1330 Maunakea Street  
Honolulu, HI 96813

RE: Hawaiian Memorial Park DEIS

LUC DOCKET # A07-777

Dear Mr. Morford,

I have reviewed the draft EIS for the Hawaiian Memorial Park Expansion and would request that you address these concerns and questions:

- 1) According to your report, you state that Hawaii's people would prefer interment to cremation and that HMP will need to expand its inventory due to the baby boomer generation moving into their 50s and 60s. **What is the current 2008 cremation rate in Hawaii? How do we compare to the rest of the nation? What references do you have that confirm baby boomers prefer interment over cremation or alternative environmentally acceptable practices?**
- 2) You also maintain that "if burial space is developed elsewhere on O'ahu to accommodate projected demand, potential impacts similar to those anticipated as a result of the Proposed Action will be expected at other sites." **Are there any other cemeteries currently being built? If there are, could SCI/HMP justify building another cemetery on an island where land is finite and precious?**
- 3) The United Kingdom and Japan, with limited land use, have found alternatives for disposing of their deceased. These alternatives could be lucrative as well. **Have you researched and considered more eco-friendly alternatives: artificial reef burials, scattering of ashes, Promession, green burial services and products?**
- 4) Traditional Chinese culture and feng shui specialists believe that the siting of a grave can affect generations to follow. Home sites with a close proximity to a cemetery are highly undesirable. Some real estate agents say that some Chinese will not live within 5 miles of a cemetery. So, from an investor's viewpoint, you will decrease the salability of our homes in Piko'ioia. **Instead of making OUR homes 100% sellable, we now have to exclude the number of people who don't want to live near a cemetery. How can you assure us that the proposed cemetery expansion will not affect our real estate values?**
- 5) Your assumption that the stigma of living near a cemetery is not longer true, is just that -- an assumption. Residents who live in this neighborhood bought their

- homes believing that the conservation land on the hillside would remain green and open for generations to come. **Have you polled the neighborhood to determine the residents' opinions of living near a graveyard?**
- 6) The DEIS mentions Formaldehyde and how the potential for the release of it into groundwater is thought to be very small to non-existent. You state that recent studies examining this issue have not found significant effects (Bent, 2007) **Is it possible that you misspelt the author's name? Where in the article does it reference Formaldehyde?**
- 7) Researchers in Australia, Canada, UK, Africa, Denmark have published papers on cemetery contamination and have acknowledged that deadly chemicals in the burial process pose serious threats to our drinking and groundwater supplies. **Has HMP taken any soil samples or done any research on burial seepage and possible groundwater contamination to assess potential environmental and public health impacts on our community?**
- 8) Kawa Stream and Kaneohe Bay have been identified on the EPA's 303(d) list as waterbodies not meeting state or federal water quality standards. Our Kawa Watershed is part of the Koolauoko Watershed Region, a category 1 Watershed considered for watershed restoration due to cultural and resource issues. **Even with Best Management Practices introduced and originally employed, how could construction of this magnitude, for 10 - 20 years, not exacerbate any already fragile ecosystem? Who will monitor the BMPs to ensure that they are maintained over 10 - 20 years?**
- 9) The stream bed beyond Lipalu Street appears to be the last pristine portion of Kawa Stream. Although the stream flow in this area is intermittent, when it does, flow, it is beautiful and reminiscent of how Hawaii once was. **How will the roads to the 20 new homes and the extension of the cemetery affect this irreplaceable portion of Kawa Stream?**
- 10) **Will the state provide backup mechanisms and policies to ensure the biological integrity of Kawa Stream and Kaneohe Bay under state and federal water quality standards?**
- 11) It is important for the protection of groundwater to have knowledge of the percolation and seepage capacity of soils. The DEIS states that the majority of Petition Area will retain similar percolation rates, as turf and revegetated areas have similar rates to the existing forest flora. **What references were cited that show a forest region has the same recharge and seepage capacity as a scattering of trees and 30 acres of turf grass?**
- 12) A survey by Mink and Lau (1990) notes lower aquifer in the area that contains water suitable for drinking. **What are considered safe distances between aquifers and cemeteries in various geological and hydrogeological situations?**

Helber Hastert & Fee  
Planners, Inc.

October 8, 2008

Julianne McCreedy  
45-423 Ohaha Street  
Kāne'ohe, HI 96744

Dear Mrs. McCreedy:

Draft Environmental Impact Statement  
Hawaiian Memorial Park Cemetery Expansion  
TMK (1) 4-5-033:1  
Kāne'ohe, O'ahu, Hawaii'i

Thank you for your letter dated August 22, 2008 providing comments on the Draft Environmental Impact Statement (EIS) for the above-referenced project. For your ease of reference, we have included your comments in the order they appear in your letter, followed by our response:

1. According to your report, you state that Hawaii's people would prefer interment to cremation and that HMP will need to expand its inventory due to the baby boomer generation moving into their 50s and 60s. What is the current 2008 cremation rate in Hawaii? How do we compare to the rest of the nation?

Response: As noted in the Draft EIS in Table 8, the cremation rate for Hawaii was 64% of total dispositions in 2005 (The State Data Book for 2006 is the most current data available). According to the National Funeral Directors Associate, the average for the United States for 2005 deaths was 30.88%.

2. What references do you have that confirm baby boomers prefer interment over cremation or alternative environmentally acceptable practices?

Response: The EIS documents the rise in preference for cremation over casketed burials during the last 20 years. However, the change in preference seems to have leveled off recently. Even with a majority of preference for cremation, the number of burials will continue to increase as the population ages, with ever-increasing numbers in older age cohorts.

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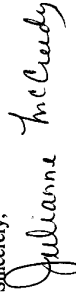
13) It has already been noted in the TMDL Implementation Plan for Kawa Stream that a "site visit and interview with Location Manager indicated there is no written management plan or systematic record-keeping to guide and verify operations" of landscape management practices. Our homes will be in close proximity to a graveyard. **How will you assure us that your applications of fertilizers, pesticides, and herbicides will not affect the public health of our community? Who will monitor your record-keeping?**

14) It's a new generation with different values. **How can you be sure that future generations will honor cemeteries in the same way as we do today? How will you protect the mausoleums and burial sites from plundering and decay?**

15) The DEIS claims that affordable housing opportunities will be provided for low and moderate income residents of the State of Hawaii to the satisfaction of the City and County of Honolulu. According to a Summary of the City's Auditor's Report (2007), the department of planning and permitting's administration of unilateral housing is inadequate, in-lieu fee collections have not resulted in affordable benefits for the 80 - 120 percent of the median income group, and an accumulating and redeeming affordable housing credit are not formalized in ordinance and rule. **How can we have confidence that your proposal will be honored and monitored when there is inadequate staffing to properly assess developer compliance according to formal policies and procedures?**

I look forward to your response.

Sincerely,



Julianne McCreedy  
45-423 Ohaha Street  
Kaneohe, HI 96744

CC: Office of Environmental Quality Control  
Dan Davidson, Land Use Commission, State of Hawaii  
**Helber, Hastert and Fee**

3. You also maintain that "if burial space is developed elsewhere on O'ahu to accommodate projected demand, potential impacts similar to those anticipated as a result of the Proposed Action will be expected at other sites." Are there any other cemeteries currently being built? If there are, could SCI/HMP justify building another cemetery on an island where land is finite and precious?

Response: A new cemetery is being considered in the Hawai'i Kai area, but it has not been completed and the reasons surrounding this are unknown. Demand and need for burial services in Hawai'i is a very real community service, and is in fact rising. This will not go away if Hawaiian Memorial Park (HMP) does not expand the cemetery.

4. The United Kingdom and Japan, with limited land use, have found alternatives for disposing of their deceased. These alternatives could be lucrative as well. Have you researched and considered more eco-friendly alternatives: artificial reef burials, scattering of ashes, Promession, green burial services and products?

Response: HMP provides interment services and options desired and requested by the community and its families. HMP has many viable alternatives available to choose from, but the decision by each individual family is a very personal one and should not be dictated by HMP or the government. Alternative natural scatterings are already available within Hawai'i to anyone who desires this option. Green burial service requests are in the news but are insignificant in terms of the actual requests and desires of families. HMP will always consider those appropriate options requested by families and within the approved state regulatory framework.

5. Traditional Chinese culture and feng shui specialists believe that the siting of a grave can affect generations to follow. Home sites with a close proximity to a cemetery are highly undesirable. Some real estate agents say that some Chinese will not live within 5 miles of a cemetery. How can you assure us that the proposed cemetery expansion will not affect our real estate values?

Response: There are numerous cemeteries throughout O'ahu, with many of them located adjoining residential neighborhoods, with hundreds of dwelling units adjacent to them. They are integral features of the fabric of our community. This is also the case for HMP. In fact, Parkview subdivision was developed well after the development of HMP, and this neighborhood seems to be thriving. Additionally, some studies that

examine home sale prices and proximity to open space include cemeteries as a category of open space along with parks and golf courses. Results have found cemeteries to not have any statistically significant impact on the sale price.

6. Your assumption that the stigma of living near a cemetery is no longer true, is just that — an assumption. Have you polled the neighborhood to determine the residents' opinions of living near a graveyard?

Response: Please refer to the answer to Question #5 above. The numerous cemeteries that exist on O'ahu are integral features of the fabric of our community and people have accepted them as neighbors. HMP is used by its neighbors as a park by walkers, runners, and others who enjoy the open space and quiet in a passive manner. There is a strong argument to be made that HMP is an amenity for its neighbors.

7. The DEIS mentions Formaldehyde and how the potential for the release of it into groundwater is thought to be very small to non-existent. You state that recent studies examining this issue have not found significant effects (Bent 2007) Where in the article does it reference Formaldehyde?

Response: Formaldehyde is discussed in Section 3.1 Factors, of the article.

8. Researchers in Australia, Canada, UK, Africa, Denmark have published papers on cemetery contamination and have acknowledged that deadly chemicals in the burial process pose serious threats to our drinking and groundwater supplies. Has HMP taken any soil samples or done any research on burial seepage and possible groundwater contamination to assess potential environmental and public health impacts on our community?

Response: HMP has not taken any soil samples as there has never been any indication of any issues associated with the existing cemetery or any other reason to undertake any monitoring or testing. It is our understanding that the contamination found from cemeteries has been related to older cemeteries and a problem with arsenic, which was used in the past as an embalming agent but is no longer used today.

9. Kawa Stream and Kaneohe Bay have been identified on the EPA's 303(d) list as waterbodies not meeting state or federal water quality standards. Our Kawa Watershed is part of the Koolauupoko Watershed Region, a category 1 Watershed considered for watershed restoration due to cultural

and resource issues. Even with Best Management Practices introduced and originally employed, how could construction of this magnitude, for 10—20 years, not exacerbate any already fragile ecosystem? Who will monitor the BMPs to ensure that they are maintained over 10—20 years?

Response: The retention areas will be designed to ensure that pollutant levels of stormwater (Total Suspended Solids (TSS), Nitrogen (TN), Phosphorus (TP)) that ultimately reach Kāwā Stream from the Petition Area will not increase from current levels. The proposed retention system has been developed to satisfy the City and County of Honolulu's design storm event, and will capture all of the runoff generated by the daily rainfall events used to generate the Kāwā Watershed Total Maximum Daily Loads. This equates to a net reduction of 27.5% of the TSS, 17.5% of the TN, and 17% of the TP that currently enters the Kāwā Stream system. No one has a greater vested interest in the proper design and maintenance of these retention areas than HMP; both for appearance and water quality issues, as well as offsite liability.

Also, to clear up a misconception many people have expressed, construction for the cemetery expansion will not be continuous over 10-20 years. Construction will last 6± months, with three phases that are separated by several years.

10. The stream bed beyond Lipalu Street appears to be the last pristine portion of Kawa Stream. Although the stream flow in this area is intermittent, when it does flow, it is beautiful and reminiscent of how Hawaii once was. How will the roads to the 20 new homes and the extension of the cemetery affect this irreplaceable portion of Kawa Stream?

Response: We are unsure which section of Kawa Stream you are referring to, and know of no sections that exist beyond the mauka end of Lipalu St. Additionally, there will not be a road beyond Lipalu Street or houses built as the Petitioner has concluded through the EIS analysis that Alternative III, "Cemetery Only", is the preferred alternative.

11. Will the state provide backup mechanisms and policies to ensure the biological integrity of Kawa Stream and Kaneohe Bay under state and federal water quality standards?

Response: You would need to discuss with the State what their intentions are related to the biological integrity of Kāwā Stream and Kaneohe Bay. However, HMP will commit to participate in a water quality monitoring

program for Kāwā Stream.

12. It is important for the protection of groundwater to have knowledge of the percolation and seepage capacity of soils. The DEIS states that the majority of Petition Area will retain similar percolation rates, as turf and revegetated areas have similar rates to the existing forest flora. What references were cited that show a forest region has the same recharge and seepage capacity as a scattering of trees and 30 acres of turf grass?

Response: Percolation rates deal mostly with the underlying soil characteristics, which will not be changed. Runoff coefficients, used for the purpose of drainage calculations, will vary depending up the nature of the finished surfaces (ie: bare soils, planted areas, or paved areas). In this context, a forested area and a grassed area both have the same runoff coefficient because both ground covers act similarly in absorbing rainfall runoff. The reference used was the City and County of Honolulu Department of Planning and Permitting's Rules Relating to Storm Drainage Standards of January 2000.

13. A survey by Mink and Lau (1990) notes a lower aquifer in the area that contains water suitable for drinking. What are considered safe distances between aquifers and cemeteries in various geological and hydrogeological situations?

Response: The existing and proposed areas of HMP are located below the Underground Injection Control line established by the Board of Water Supply. The groundwater beneath the Petition Area is not used as a source of drinking water by the BWS, nor is it intended to be used for that purpose by the BWS. Conversations with the Department of Health's Safe Drinking Water Branch indicated there are no "hard and set" regulations dealing with aquifer distances, especially if the well is dedicated mainly for irrigation purposes. If a well is dedicated as a domestic/potable water source, there are agency rules and regulations that need to be followed to ensure safe drinking water quality.

14. It has already been noted in the TMDL Implementation Plan for Kawa Stream that a "site visit and interview with Location Manager indicated there is no written management plan or systematic record-keeping to guide and verify operations" of landscape management practices. Our homes will be in close proximity to a graveyard. How will you assure us that your applications of fertilizers, pesticides, and herbicides will not affect the public health of our community? Who will monitor your record-keeping?

Response: At the landowners suggestion, the EIS suggests mitigation measures that involve monitoring measures that involve monitoring the application of fertilizers by the evaluation of grass clippings by the University of Hawaii. There is also a mitigation measure recommended to keep a log of all herbicides, pesticides, and fertilizers used at the cemetery. Also, the Petitioner is willing to participate in water quality monitoring program for Kawa Stream, with oversight by Department of Health, Clean Water Branch.

HMP does not operate like a golf course, and does not manage its turf grass as a golf course does. Pesticides and herbicides are not used as a normal cemetery maintenance regimen and have been rarely used in past years for any reason. It is probable that nearby residents contribute a much greater use of herbicides and pesticides than the cemetery. If an extraordinary situation should occur, a certified Pest Control Advisor would be utilized to develop an appropriate environmentally sound program and the concentrated effort would be on an Integrated Pest Management approach. The turf areas are treated with slow release turf fertilizers twice a year: in the fall before the rainy season and in the spring before summer heat. HMP targets applications to dry periods to ensure it is absorbed by the plant material as opposed to fast acting fertilizers that are more likely to be washed into the soils.

15. It's a new generation with different values. How can you be sure that future generations will honor cemeteries in the same way as we do today? How will you protect the mausoleums and burial sites from plundering and decay?

Response: Through the State regulated Endowment Care Fund for HMP, long term maintenance of the cemetery grounds and facilities will be carried out in perpetuity. This is an important part of HMP's promise to all of HMP's families.

16. The DEIS claims that affordable housing opportunities will be provided for low and moderate income residents of the State of Hawaii to the satisfaction of the City and County of Honolulu. According to a Summary of the City's Auditor's Report (2007), the department of planning and permitting's administration of unilateral housing is inadequate, in-fieu fee collections have not resulted in affordable benefits for the 80—120 percent of the median income group, and an accumulating and redeeming affordable housing credit are not formalized in ordinance and rule. How can we have confidence that your proposal will be honored and monitored when there is inadequate staffing to properly assess developer

compliance according to formal policies and procedures?

Response: Since the project will not longer include residential lots, the affordable housing requirements are no longer applicable to this project.

We appreciate your participation in this review process. Your letter and this response will be appended to the Final EIS.

Sincerely,

HELBER HASTERT & FEE, Planners



Scott Ezer  
Principal

cc: Jay Morford, Hawaiian Memorial Life Plan, Ltd.  
Mike Green, Clark & Green Associates  
Office of Environmental Quality Control  
Orlando Davidson, Land Use Commission



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