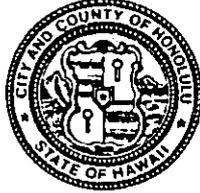


Manoa Chinese Cemetery
Pavillion Dance School

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET • HONOLULU, HAWAII 96813
PHONE: (808) 523-4414 • FAX: (808) 527-6743

JEREMY HARRIS
MAYOR



JAN NAOE SULLIVAN
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR

RECEIVED

December 2, 1998 98 DEC -4 P2:25

98/CUP1-036(LK)

ENVIRONMENTAL
QUALITY CONTROL

Mr. Gary Gill, Director
Office of Environmental Quality Control
State of Hawaii
State Office Tower, Room 702
235 South Beretania Street
Honolulu, Hawaii 96813

Dear Mr. Gill:

CHAPTER 343, HRS
Environmental Assessment (EA)/Determination
Finding of No Significant Impact

Recorded Owner/	:	
Applicant	:	Lin Yee Chung Association
Consultant	:	KRP Information Services
Location	:	3225 Pakanu Street - Manoa
Tax Map Key	:	2-9-43: 1
Request	:	Conditional Use Permit, Type 1 for Use of Historic Structures
Proposal	:	The applicant proposes to utilize a meeting hall at the historic Manoa Chinese Cemetery for a dance school. The property is listed on the Hawaii Register of Historic Places.
Determination	:	A Finding of No Significant Impact is issued

Attached and incorporated by reference is the Final EA prepared by the applicant for the project. Based on the significance criteria outlined in Chapter 200, State Administrative Rules, we have determined that preparation of an Environmental Impact Statement is not required.

159

Mr. Gary Gill, Director
Page 2
December 2, 1998

We have enclosed a completed OEQC Bulletin Publication Form and four copies of the Final EA. If you have any questions, please contact Lynne Kauer of our staff at 527-6278.

Very truly yours,



For JAN NAOE SULLIVAN
Director of Planning
and Permitting

JNS:am
attachs.

g:featrns.lk

0000 00 12 1552

1998-12-23-0A- FEA- Manoa Chinese
Cemetery Pavillion Dance School

DEC 23 1998

FILE COP

1998 NOV 18 PM 3:46

DEPT OF PLANNING
and PERMITTING
CITY & COUNTY OF HONOLULU

Final Environmental Assessment

Use of the Manoa Chinese Cemetery Pavilion
for Ballet Classes and Rehearsals

for
Lin Yee Chung Association

by
KRP InfoServices
1314 So. King St., Suite 951
Honolulu, Hawaii 96814

November 1998

0000 00 12 1553

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

SUMMARY

Applicant: Lin Yee Chung Association
3430 East Manoa Road
Honolulu, Hawaii 96822
Phone: (808) 988-5543

EA Preparer: KRP Information Services
1314 South King St. Suite 951
Honolulu, Hawaii 96814

Contact: Jacqueline Parnell, AICP
Phone: (808) 593-8331

Approving Agency: Department of Planning and Permitting,
City and County of Honolulu
Conditional Use Permit Type 1
(Use of Historic Structures)

Contact: Lynne Kauer
Phone: (808) 527-6278

Project Location: 3225 Pakanu Street
Manoa Valley, Honolulu, Hawaii

Tax Map Key: 2-9-043:01

Area: 10.753 acres

Recorded Fee Owner: Lin Yee Chung Association
3430 East Manoa Road
Honolulu, Hawaii 96822
Phone: (808) 988-5543

Existing Land Use: Cemetery

Development Plan
Land Use Map: PF Public Facility

Zoning: P-2 General Preservation

0000 00 12 1554

TABLE OF CONTENTS

PREFACE

SUMMARY

	Page
1. PROJECT DESCRIPTION	1
1.1 Location	1
1.2 Existing and Surrounding Uses	1
1.3 Background	1
1.4 Need for Current Request	2
1.5 Community Benefits	3
1.6 Compatibility with Residential Benefits	3
2. DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES	4
2.1 Climate	4
2.2 Flood Hazard	4
2.3 Vegetation	5
2.4 Cultural Resources	5
2.5 Traffic and Parking	6
2.6 Noise	9
2.7 Air Quality	10
2.8 Public Services	10
2.9 Utilities	10
2.10 Aesthetics	11
3. RELATIONSHIP TO PLANS, POLICIES AND CONTROLS	11
3.1 State Land Use Law	11
3.2 City and County of Honolulu General Plan	11
3.3 City and County of Honolulu Development Plan	12
3.4 City and County of Honolulu Land Use Ordinance	12
4. ALTERNATIVES TO THE PROPOSED ACTION	13
4.1 No Action Alternative	13
4.2 Alternative Uses for the Cemetery Building	13
4.3 Alternative Sites for Ballet Hawaii	13
5. AGENCIES AND INDIVIDUALS CONSULTED IN PREPARATION OF THE DRAFT ENVIRONMENTAL- ASSESSMENT	14
5.1 Pre-Assessment Consultation	14
5.2 Comments on the Draft Environmental Assessment	14
6. FINDINGS AND ANTICIPATED DETERMINATION	15
7. LIST OF PREPARERS	16

0000 00 12 1555

TABLE OF CONTENTS
(continued)

FIGURES

1. Project Location
2. Tax Map Key
3. Vicinity Map
4. DP Land Use Map
5. Zoning Map
6. Site Plan
7. Flood Zones
8. Vegetation in the Vicinity of Proposed Use
9. Peak Traffic Conditions
10. Floor Plan
11. North/South Elevations
12. East/West Elevations

APPENDICES

APPENDIX A ASSESSMENT OF BOTANICAL RESOURCES

APPENDIX B TRAFFIC ASSESSMENT

APPENDIX C ENVIRONMENTAL NOISE ASSESSMENT

APPENDIX D COMMENTS AND RESPONSES

0000 00 12 1556

PREFACE

This Final Environmental Assessment and Finding of No Significant Impact has been prepared pursuant to Chapter 343, Revised Statutes, and Title 11, Chapter 200, Hawaii Administrative Rules, Department of Health, State of Hawaii. Proposed is an applicant action for the use of a historic property listed on the State Register of Historic Places. The accepting agency for this EA is the Department of Planning and Permitting, City and County of Honolulu, in conjunction with the processing of a Conditional Use Permit - Type 1 (CUP-1) for the use of a historic property pursuant to Section 4.40-18 (Use of Historic Structures) of the Land Use Ordinance. The intent of Section 4.40-18 is "to provide an incentive for owners of historic structures to retain them by allowing uses not otherwise permitted in the underlying zoning district."

The applicant, Lin Yee Chung Association, proposes to lease a meeting hall at the Manoa Chinese Cemetery for use by Ballet Hawaii for ballet classes and rehearsals. It will provide the owner of the property, the Lin Yee Chung Association, income to maintain and preserve this historic property.

0000 00 12 1557

1. PROJECT DESCRIPTION

1.1 Location

The Manoa Chinese Cemetery is located on a knoll on the interior slopes of Manoa Valley (Figure 1), Tax Map Key 2-9-043:01 (Figure 2). It covers 10.753 acres and is bounded by Pawaina and Pakanu Streets, Akaka Place and East Manoa Road (Figure 3). The property is designated PF on the Development Plan Land Use Map (Figure 4) and is zoned P-2 (Figure 5). The Cemetery is defined by a low rock wall. The meeting hall planned for use by Ballet Hawaii is located at 3225 Pakanu Street (See site plan, Figure 6).

1.2 Existing and Surrounding Uses

The area included within the cemetery's boundaries contains approximately 10,000 individual burials and several roadways and structures. The main roadway leads to the principal burial sites called "Tai Gung San" (Great Ancestors Mound), an area under a large banyan tree where the earliest Chinese to be buried in the Cemetery are honored each year. A circular concrete structure with a gate overlooks most of the cemetery and is used as an altar in the ceremonies. There is also a bone house and a ceremonial gate at the entrance to the cemetery. A plant nursery abuts the cemetery on Pakanu Street.

In the 1960s, a large Community Hall was built on the property to accommodate visitors at the cemetery during Ching Ming, a one-month period beginning in late March or early-April of each year when visitation to the cemetery increases as family and friends gather to honor their ancestors in a traditional manner. This building, also referred to as the pavilion or meeting hall, is proposed to be used for lessons and rehearsals by Ballet Hawaii when it is not in use for the Ching Ming celebration.

Additional buildings belonging to the Lin Yee Chung Association are located at 3430 East Manoa Road. These are presently leased to Chabad of Hawaii, a Jewish Day School, and are being used during the week for school activities. The rest of the area surrounding the cemetery is made up of single family residences.

1.3 Background

Lee Yin Chung Association

The Lin Yee Chung Association was founded in 1851, when a small band of Chinese immigrants banded together to form the first Chinese "Society" in the Kingdom of Hawaii. These individuals were mostly contract laborers who had come to Hawaii to work in the sugar plantations. Like other immigrants who were "strangers in a strange land," they pooled their limited resources in order to help one another with financial and social needs.

0000 00 12 1558

One of the most important of these was the need to establish a cemetery where members could be buried according to traditional Chinese practices and rituals. The Manoa Lin Yee Chung Chinese Cemetery Association was incorporated in 1889 as an eleemosynary organization. The cemetery is the oldest and largest Chinese cemetery in the Hawaiian islands. (Application for placement on the State Register of Historic Places, N. Purnell 1997).

Ballet Hawaii

Ballet Hawaii is the successor organization to Friends of the Ballet which was established in 1975 as a support group for the Honolulu City Ballet (HCB) -- a federal Comprehensive Employment Training Act (CETA) project. When CETA funding was terminated in 1979, the City discontinued its sponsorship of the HCB. In response to this loss of federal funding, the "Friends" formed Ballet Hawaii to continue the programs begun by the HCB. Ballet Hawaii subsequently assumed the administrative and financial responsibility for producing and presenting ballet in Hawaii and providing professional dance education for youth. 1998 marks its 23rd year of operation in fulfilling its mission to present, promote and develop ballet in Hawaii, including the annual production of the Nutcracker Suite. Ballet Hawaii employs a corps of 10 talented dancers who have regularly scheduled opportunities to perform, study and teach.

The Ballet Hawaii School, established in 1986, serves the community by providing a training program for student dancers, some of whom may earn a place in the professional company. The school currently has a weekly enrollment of 130 students at all levels of ballet from pre-ballet to the professional dancer. Classes are held Monday through Saturday and range in size from 8 to 22 students. Please see Table 1 for the schedule of fall classes for 1998.

Approximately one third of the students reside in the Manoa/Makiki area. Scholarships are provided for students who cannot pay tuition fees. The program features master teachers from the international ballet world which in 1996 included Shamil Yagudin from Russia's famed Bolshoi Ballet.

1.4 Need for Current Request

Maintaining the grounds and buildings of the Manoa Chinese Cemetery is expensive. The Association does not have sufficient income to both maintain cemetery landscaping and make needed repairs to the termite-ridden buildings. The Lin Yee Chung Association is seeking a Conditional Use Permit to allow Ballet Hawaii to offer ballet instruction at the pavilion site so that the non-profit Association can receive economic benefits via lease rent and maintenance fees to help maintain the cemetery grounds and existing structures and preserve the historic value of the property. A Conditional Use Permit will solve both the Association's problem of insufficient income to maintain the property and Ballet Hawaii's desperate need for instruction and rehearsal space.

0000 00 12 1559

The ballet school proposes to utilize the existing Pavilion building in its "as is" condition, and proposes no alteration to the grounds of the cemetery. By so doing, the proposed use by the ballet school will help preserve and maintain the existing conditions of this historic property. The Lin Yee Chung Association does plan to make some repairs to maintain the structure.

1.5 Community Benefits

Through payment of lease rent to the Lin Yee Chung Association, Ballet Hawaii will be helping to facilitate the upkeep and continual restoration of the grounds of the cemetery and thereby help prevent the site from falling into disrepair. Without rental income from this proposed use, the Association's ability to pay for lawn trimming and repair of the termite-ridden Pavilion building will be impaired, thus resulting in a cemetery overgrown with weeds and littered with trash. This would then result in a site that attracts loitering and criminal activities. However, by renting the Pavilion to the ballet school, the proposed low-impact usage as well as rental income gained will help to ensure the Association's ability to maintain the cemetery's aesthetically pleasing, well-manicured, open-space character and value to the community.

In addition, the ballet school's return to the Manoa Chinese Cemetery location will offer families who live or work in Manoa, a viable, healthy, wholesome, educational and accessible after-school activity choice besides softball, soccer, and other outdoor activities.

1.6 Compatibility with Residential Neighbors

As earlier stated, the project proposes no physical or structural alteration to the existing Pavilion structure or the grounds of the Cemetery which would otherwise detract from its open-space, natural character as typified by the intent of the P-2 district. The ballet school activities will be able to occur within the given Cemetery infrastructure, and therefore support and facilitate the purpose and intent of the P-2 district.

The dance school's proposed use of the Pavilion in the Cemetery will blend in with the essentially residential character of the neighborhood, particularly since the activity will not necessitate any change to the existing physical or structural condition of the historic property. Two probable changes that may be noticed by residents and passersby will be a slight increase in parked cars (average number on weekday afternoons is 5; Saturdays is 9) in the internal driveway fronting the Pavilion). In addition, during the late fall and winter session, the inside lights of the Pavilion will probably be turned on earlier due to shorter daylight hours. However, this will occur on the Cemetery property as it will within all of the other surrounding properties.

Parents and students will be required to adhere to the dance school's self-instituted traffic and parking plan to avoid causing noise or traffic impacts in the

0000 00 12 1560

neighborhood. In fact, the minor increase in human activity in and along the sidewalk fronting the Cemetery, will probably result in a positive impact by inadvertently instilling a greater sense of safety and security for the neighbors of this expansive 10.75 acre property.

Thus, the proposed dance activities are not foreseen as a detraction from the residential character of the neighborhood. Instead they are intended to blend in as a low-impact, non-disruptive activity. It should be noted that ballet and hula instruction takes place in many areas of Honolulu. The lives of Honolulu's children are enriched by these activities, and communities by their presence.

2. DESCRIPTION OF THE EXISTING ENVIRONMENT, PROJECT IMPACTS AND MITIGATION MEASURES

The following is a description of the existing environment, assessment of potential project impacts and measures proposed to mitigate potential impacts.

2.1 Climate

Existing Conditions

The climate of Manoa Valley is relatively mild. Average temperatures range from a low of approximately 70 degrees in the coolest month to a high of 76 degrees in the warmest month. Average annual rainfall is about 47 inches. Light northeasterly tradewinds of about 12 to 15 knots are present most of the year.

Impacts

The relatively high rainfall sustains the landscaping on the property without significant reliance on irrigation using domestic water supplies. Use of the pavilion for dance instruction and rehearsals will have no impact.

2.2 Flood Hazard

Existing Conditions

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM), the subject property is designated in Zone X, "outside the 500 year flood plain." (Figure 7) There are no known drainage problems in the vicinity.

Impacts

Use of the pavilion for ballet lessons and rehearsals will not alter the amount of impermeable surface area on the property. Thus, no significant increase in storm runoff volume from the property is anticipated.

0000 00 12 156 1

2.3 Vegetation

Existing Conditions

A botanical survey of the property was conducted in March 1998 by Winona Char & Associates (see Appendix A). The report describes existing vegetation and notes the absence of threatened or endangered species.

The vegetation surrounding the pavilion building consists mainly of a grassy lawn composed primarily of Hilo grass. There is a row of mature Italian cypress trees facing Pakanu Street (makai side). Other woody components found along the makai side of the building include two large old common mango trees, each approximately 50 feet tall, with 50-foot spreads; 40 feet tall Java plums with approximately 30-foot spreads, and coconut trees that are 35 feet tall with two to three foot diameter trunks. On the mauka side there are plantings of weeping willow and various hybrid ti, croton and ixora. Also found here are sago palm, banyan, golden fruited palm, and bowstring hemp. On the ewa side of the building there is a large vegetable and herb garden and two loulu palms. Figure 8 shows the vegetation in the vicinity of the proposed use.

None of the plants observed around the building is a threatened or endangered species, nor is any plant a species of concern (U.S. Fish and Wildlife Service 1997). None of the trees around the building is on the City and County's exceptional trees' list (Ordinance No. 78-91).

Impacts

Flora and fauna on the property will not be affected by the use of the pavilion for ballet lessons and rehearsals. If all other practical measures fail to mitigate noise impacts, the recommendation of the botanical consultant for additional plantings of shrubs between the Italian cypress trees along Pakanu Street will be considered.

2.4 Cultural Resources

Existing Conditions

The Manoa Chinese Cemetery is on the State Register of Historic Places. Founded in 1852, the cemetery, also known as Lee Yee Chung, is the oldest and largest Chinese cemetery in the Hawaiian Islands. It is significant for two major reasons: 1) It has all the design elements of a "classic" Chinese cemetery, and 2) As a traditional cultural property, each year in April the "Three Presentation Cemetery" (a traditional graveyard ritual) is performed during "Ching Ming," the Chinese memorial season. No other Chinese cemetery in Hawaii has both these features (Application for placement on the State Register of Historic Places, N. Purnell 1997).

0000 00 12 1562

Impacts

The proposed use of the pavilion should have no effect on the historic character of the property. Ballet classes will not be scheduled during Ching Ming. The use is supported by the State Historic Preservation Division in a letter dated August 3, 1998 (Please see Appendix D. Comment Letters and Responses). The letter states that

The meeting hall which Ballet Hawaii intends to utilize contributes to the historic significance of the Chinese Cemetery as it allows the continuance of the traditional cultural practice of the Ching Ming celebration. We support the use of the pavilion as a dance school because Ballet Hawaii would provide the Lin Yee Chung Association, the owners of the cemetery, a means by which it can preserve the historical and cultural significance of the cemetery.

2.5 Traffic and Parking

Existing Conditions

A traffic assessment for the proposed use was conducted by Julian Ng, Inc. in February 1998. (See Appendix B) The report describes existing conditions as follows:

Vehicular access to the pavilion is from Pakanu Street, which with Pawaina Street, links East Manoa Road with Manoa Road in the back of Manoa Valley. Pakanu Street is an improved urban residential street with curbs and concrete sidewalks. Its 50-foot right-of-way includes a paved roadway that is 36 feet wide (between curb faces).

Approximately 600 feet makai of Pakanu Street, East Manoa Road splits into two roadways; the right (kokohead) leg continues beyond Pakanu Street and East Manoa Road terminates one block farther mauka at Alani Drive. The left leg terminates at Pakanu Street. At both intersections, Pakanu Street traffic is stop controlled. At the ewa intersection, two driveways serving the Chinese Cemetery also meet Pakanu Street on the mauka side.

The kokohead driveway serves mauka bound traffic departing the intersection, providing vehicular access to a portion of the cemetery; traffic exiting this part of the cemetery is directed out onto Akaka Place. The ewa driveway serves two way traffic and the makai bound approach has a stop sign.

Access to the pavilion is provided by the paved ewa driveway. The driveway is constricted near the entrance to a width of eighteen feet, but is typically twenty to twenty-two feet wide between curbs. Parking parallel to the curb is permitted. An asphalt ramp is provided near the pavilion to allow access to a grassed area which is used for overflow parking.

Traffic in the area is typically low. While Pakanu Street is a local street providing access to abutting properties, the block between East Manoa Road and Pawaina Street

0000 00 12 1963

is an important link between the two sides of Manoa Valley.

Traffic volumes on Pakanu Street between East Manoa Road and Pawaina Street are estimated to be 2,000 vehicles per day (weekday), based on a machine count taken in May, 1995 by the City and County of Honolulu. Peak hourly traffic volumes were estimated from these counts and manual counts taken on three Saturdays in the fall of 1997 by Ballet Hawaii.

These volumes represent "normal" conditions on Pakanu Street between Pawaina Street and the ewa intersection with East Manoa Road over most of the year. Onstreet parking, while available, is rarely used. There are only four houses along Pakanu Street near Pawaina Street; a plant nursery and the cemetery abut the remainder of the block.

During Ching Ming, a one-month period beginning in late-March or early-April of each year, visitation to the cemetery increases as family and friends gather to honor their ancestors in a traditional manner. Traffic volumes and parking demands increase; on-street parking is sometimes difficult to find and some traffic congestion occurs on weekends. While these conditions are worse than the "normal" conditions described above, these conditions occur only for a limited time.

Impacts

The proposed project will increase traffic in the area during the times when classes are held, as parents arrive to drop off or pick up students. Short-term parking demand will increase due to drop-off or pick-up activities, and for parents who decide to wait.

Use of the pavilion by Ballet Hawaii will only occur when the pavilion is not used for its primary activity during Ching Ming. Therefore, the potential traffic impact of the project is on the "normal" conditions. The highest hourly traffic on Pakanu Street under "normal" conditions is 175 vehicles per hour during the weekday PM Peak Hour. A joint parking agreement between Lin Yee Chung Association and Ballet Hawaii has been signed and is included in this document at the end of the Traffic Assessment, Appendix B. The purpose of the agreement between the two parties is to ensure that there is no conflict regarding parking requirements and parking spaces available during the one time of the year when demand for parking space is needed for many cemetery visitors and Ching Ming attendants. As noted earlier, there will be no ballet classes held during Ching Ming. At other times of the year, visitors come a few at a time and park near the visited grave sites.

Ballet Hawaii holds classes and rehearsals on weekday afternoons from 12 noon to 6 PM, and on Saturdays between 8:30 AM and 2:30 PM. Rehearsals for the December production of the *Nutcracker* extends evening hours until 9:30 PM. Sessions are typically 30 minutes to 1 1/2 hours long. During operations, there are two employee vehicles parked. On the average, about five other vehicles are parked in the area during any given class time, with another five driving in to drop off/pick up

0000 00 12 1564

students. The most significant traffic impact would be expected between two classes, when traffic due to departing students and arriving students occur simultaneously. The schedule for Fall classes is as follows:

<i>Fall Session 1998</i>					<i>Saturday</i>
August 24 - November 16					8:30-9:00 Creative Dance I
Nutcracker Auditions Sept. 19					9:00-9:30 Creative Dance II
Performance Dec. 18-20					9:30-10:15 Pre-Ballet I
Blaisdell Concert Hall					10:15-11:00 Pre-Ballet II
<i>Monday</i>	<i>Tuesday</i>	<i>Wednesday</i>	<i>Thursday</i>	<i>Friday</i>	
3:15-4:30 Ballet III	3:00-4:00 Ballet I	3:15-4:30 Ballet III	4:00-5:00 Ballet II-A	3:15-4:30 Ballet III	11:00-12:00 Ballet I-A
4:30-6:00 Ballet IV/V	4:00-5:00 Ballet II-A	4:30-6:00 Ballet IV/V	5:00-6:00 Ballet II-B	4:30-6:00 Ballet IV/V	12:00-1:00 Ballet I-B
Rehearsal 6:00-7:00	5:00-6:00 Ballet II-B	Rehearsal 6:00-7:30	Adult Beg. Ballet 6:00-7:00	Rehearsal 6:00-8:00	1:00-2:30 Inter/Advanced
For further information call the Dole Cannery Studio 521-8600 or 988-7578					Rehearsal 3:00-6:30

Ballet Hawaii employs a full-time executive director and two part-time instructors. Ballet class sizes range from less than ten students to 22 students. While some of these may be siblings or friends who would travel together, a high estimate would be that the proposed use would have an impact of 45 vehicles arriving and departing the site within a 15-minute period. Figure 7 shows an estimate of the worst-case traffic volumes at the intersection of Pakanu Street and East Manoa Road.

The traffic due to the proposed use will increase traffic in the area during the times when classes change. A capacity analysis of the unsignalized intersection showed adequate capacities as delays to stopped vehicles would be minimal.

The project impact is not expected to be significant. The increase in traffic, even on a worst-case basis, is significantly less than the "100 added vehicle trips in the peak direction (inbound or outbound) during the site's peak traffic hour" that the Institute of Transportation Engineers has suggested as a criteria for a site traffic impact access or impact study.

As indicated earlier, parents and students will be required to adhere to the ballet school's self-instituted traffic and parking plan to avoid causing traffic impacts in the neighborhood. One-way in and one-way out signs will be erected to direct both parents and cemetery visitors. A joint parking arrangement between Lin Yee Chung Association and Ballet Hawaii will be enforced. Vehicular parking and drop off/pick up requirements of the dance school can be accommodated within the Cemetery along the internal driveway system as illustrated on the revised site plan. If headlight glare from within the driveway leads to impacts on neighboring

0000 00 12 1565

properties, then vegetative screening to help block headlights from the shining from the driveway will be considered.

It should be noted that previous complaints from a resident about traffic impacts on the area from classes and rehearsals were specific to the 3430 East Manoa Road site (located at the "triangle" where a pre-school is currently operating). On specified occasions, cars exiting the triangle site between the complaining neighbor and the school site, entered a narrow roadway which, when parked cars were also present, caused congestion.

2.6 Noise

Existing Conditions

A noise assessment for the proposed use was conducted by Darby & Associates in February 1998. (See Appendix C for the full report and an explanation of acoustical terminology) The report describes existing conditions as follows:

A noise survey was conducted in the vicinity of the Manoa Chinese Cemetery pavilion building between the hours of 5:45 and 6:30 P.M. on October 11, 1996. In the absence of traffic on local streets—Pakanu Street, Akaka Street and East Manoa Road—sound levels in the range of 42 to 48 dBA were measured. With vehicular traffic on local streets the measured sound levels ranged from 56 to 68 dBA. This is typical of suburban residential communities. The dominant noise sources consist of local vehicular traffic, wind-in-foliage, insects, animals (birds and dogs), and occasional buses on East Manoa Road.

Impacts and Mitigation Measures

Noise generated by the ballet school activities, i.e., a piano and voices of instructors and students, will not significantly increase the ambient daytime or evening noise levels. For ballet school activities during the evening hours, i.e., 7:30 to 9:30 P.M., September through December, when the background noise levels are lower, the noise from the school may be more discernible, noise mitigation in the form of closing the sliding doors on the south side of the pavilion building will effectively reduce the noise propagating to the nearby homes.

The use of sound amplification equipment for certain rehearsals or classes requiring the playback of recorded music could potentially impact the nearby residential area. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

Noise complaints regarding Ballet Hawaii classes at the meeting hall at 3430 East Manoa Road were due mainly to the fact that glass panes were missing from jalousie window frames closest to the neighbor who was impacted on the ewa-makai side of the site. However, before Ballet Hawaii was able to mitigate the problem, the school was asked to vacate the site.

Because of the problems with the previous site, both traffic and noise assessments were made for the current CUP-1 application. Impacts have been determined to be insignificant.

2.7 Air Quality

Existing Conditions

Within the immediate project vicinity, vehicular-related emissions are generated from local traffic. In general, due to good exposure to winds, air quality in the vicinity has not been identified as a health concern.

Impacts

Use of the pavilion for ballet classes will have negligible impact on air quality since the volume of traffic generated by the project will be minimal.

2.8 Public Services

Existing Services

Police: The property is within the area served by the Honolulu Police Department, District 7, Honolulu Office (Manoa Moiliili to Hawaii Kai).

Fire The property is within the area served by Manoa Fire Station #22.

Refuse: Refuse is collected by the Honolulu Department of Public Works, Refuse Collection and Disposal Division.

Impacts

No significant impacts on the provision of public services are anticipated as a result of ballet classes and rehearsals.

2.9 Utilities

Existing Services

Water: Potable water is provided by the Honolulu Board of Water Supply.

Wastewater Wastewater is collected by the municipal wastewater sewer system and treated and disposed of at the City's Sand Island Wastewater Treatment Plant.

Electricity: Electrical service in the area is provided by Hawaiian Electric Company.

Impacts

Since there will be no increase in the plumbing fixture count on the property, the potential demand for water and wastewater services will not be affected. Lighting for evening rehearsals and classes and the occasional use of recorded music will not significantly increase electrical usage.

2.10 Aesthetics

Existing Conditions

The pavilion is set back from the street and is well-landscaped with mature vegetation. The entire cemetery is enclosed by a low rock wall.

Impacts

The use of the pavilion for classes and rehearsals will have no significant impact on the aesthetics of the area.

3. RELATIONSHIP TO PLANS, POLICIES AND CONTROLS

3.1 State Land Use Law

The Hawaii Land Use Law of Chapter 205, Hawaii Revised Statutes (HRS), classifies all lands in the State into four land use districts: Urban, Agricultural, Conservation and Rural. The property is designated within the Urban District.

3.2 City and County of Honolulu General Plan

The General Plan for the City and County of Honolulu, (adopted 1977) was amended by the City Council in 1992. The Plan is a statement of the long-range social, economic, environmental and design objectives for the general welfare and prosperity of the people of Oahu. The Plan is also a statement of broad policies which facilitate the attainment of the objectives of the Plan. Eleven subject areas provide the framework for the City's expression of public policy concerning the needs of the people and the functions of government. These areas include population; economic activity; the natural environment; housing; transportation and utilities; energy; physical development and urban design; public safety; health and education; culture and recreation; and, government operations and fiscal management. The proposed use of the pavilion is most directly related to the

subject area of Culture and Recreation, specifically, to Objective B *To protect Oahu's cultural, historic, architectural, and archaeological resources.* Several of the policies supporting this objective are consistent with the intent of the CUP-1 permit to accommodate uses not normally allowed under zoning as an incentive and to provide economic support to preserve historic resources:

Policy 2 - Identify, and to the extent possible, preserve and restore buildings, sites, and areas of social, cultural, historic, architectural, and archaeological significance.

Policy 5 - Seek public and private funds, and public participation and support, to protect social, cultural, historic, architectural, and archaeological resources..

Policy 6 - Provide incentives for the restoration, preservation, and maintenance of social, cultural, historic, architectural, and archaeological resources.

3.3 City and County of Honolulu Development Plan

The City and County of Honolulu's Development Plan (DP) program provides a relatively detailed framework for implementing the objectives and policies of the General Plan on an areawide basis. Eight Development Plans have been adopted covering the entire island. Each Development Plan Ordinance consists of Common Provisions applicable to all Development Plan areas, Special Provisions for each Land Use, Map, and Public Facilities Map. The DP Land Use Maps depict land use patterns which are consistent with the objectives and policies of the General Plan.

The property is located within the Primary Urban Center (PUC) DP area which includes the communities from Waialae-Kahala to Pearl City. The PUC DP Land Use Map designates the property as "Public Facility" (See Figure 4).

The property is not within any of the twelve Special Areas designated in the PUC with associated special provisions.

3.4 City and County of Honolulu Land Use Ordinance

The City and County of Honolulu Land Use Ordinance (LUO) regulates land use in accordance with adopted land use policies, including the Oahu General Plan and Development Plans. The LUO is also referred to as the zoning ordinance. Zoning designations are shown on the zoning maps for the City.

The parcel on which the cemetery pavilion is located is zoned P-2 (Figure 5). The list of permitted uses contained in Table 5.3-A *General Preservation District Permitted Uses and Structures* of the Land Use Ordinance (LUO) allows cemeteries, columbaria, crop production public uses and structures, and golf courses among other activities as principal uses in this district. Accessory use, such as that of the cemetery's pavilion, is defined in Article 9 of the LUO as

A use which meets the following conditions: 1) is a use which is conducted on the same zoning lot as the principal use to which it is related whether located

0000 00 12 1569

within the same building or an accessory building or structure, or as an accessory use of land, or which is conducted on a contiguous lot in the same ownership; 2) is clearly incidental to and customarily found in connection with the principal use; and 3) is operated and maintained substantially for the benefit or convenience of the owners, occupants, employees, customers or visitors of the zoning lot with the principal use.

The pavilion is now used as a meeting hall by the Association for traditional cultural activities in connection with the Ching Ming ritual. For the meeting hall to be also used for dance instruction and rehearsals, a Conditional Use Permit - Type 1 (CUP-1) is required. A Conditional Use Permit can be granted for the use of a historic property pursuant to Section 4.40-18 (Use of Historic Structures) of the Land Use Ordinance. The intent of Section 4.40-18 is "to provide an incentive for owners of historic structures to retain them by allowing uses not otherwise permitted in the underlying zoning district."

Use of the hall for dance instruction and rehearsals will not interfere with the present use as the Ching Ming ritual is conducted during the month of April only. The meeting hall is surrounded by cemetery grounds. The nearest residence is approximately 150 feet across Pakanu Street.

4. ALTERNATIVES TO THE PROPOSED ACTION

4.1 No Action Alternative

The no-action alternative would allow the use of the pavilion for Association activities only. This use alone generates no income to the Lin Yee Chung Association and is not an economically viable means of preserving and maintaining the historic property. Lease rent earned by the Association provides income for cemetery maintenance.

4.2 Alternative Uses for the Cemetery Building

The only suitable additional use for the pavilion is for meetings, parties, or instruction. It is not suitable for a residence. As a note, the pavilion structure was enclosed with glass paneled doors by the former lessee, the Montessori Preschool.

4.3 Alternative Sites for Ballet Hawaii

Teaching and rehearsals are an integral part of Ballet Hawaii's operations. Without school and rehearsal space, Ballet Hawaii cannot continue to exist. An additional problem is the lack of permanent storage space for the properties used for the annual production of the Nutcracker Suite. Ballet Hawaii has looked at or contacted 39 facilities during the last several years. None of these have proved viable. There are very few suitable areas available at a rental rate that Ballet Hawaii can afford and it may be forced to cease operations entirely if it cannot use the cemetery facility.

0000 00 12 1570

5. AGENCIES AND INDIVIDUALS CONSULTED IN PREPARATION OF THE DRAFT ENVIRONMENTAL ASSESSMENT

5.1 Pre-Assessment Consultation

The following agencies, elected officials and neighbors were consulted prior to preparation of the draft environmental assessment:

Department of Land and Natural Resources, Historic Preservation Division
Department of Planning and Permitting, City and County of Honolulu
Manoa Neighborhood Board. No. 7

5.2 Comments on the Draft Environmental Assessment

Comments on the draft environmental assessment were received from the following elected officials, agencies, and individuals:

State of Hawaii

Office of Environmental Quality Control
Department of Land and Natural Resources, Historic Preservation Division
Department of Health

City and County of Honolulu

Councilmember Andy Mirikitani
Department of Planning and Permitting
Traffic Division, DPP
Department of Planning
Department of Design and Construction
Fire Department
Police Department

Individuals

Jesse Ikei
Allen Kamemoto
Kazao Kamemoto
Larry Kamemoto and Lorrie Y.W. Chang
Keith Okimura
Dianne A. and Reuben T. Shimazu

Letters with substantial comments have been answered. The letters and copies of the responses, as appropriate, are attached to the end of this document as Appendix D.

0000 00 12 1971

6. FINDINGS AND DETERMINATION

Chapter 200 (Environmental Impact Statement Rules) of Title 11 Administrative Rules of the State Department of Health specifies criteria for determining if an action may have a significant effect on the environment. The relationship of the proposed project to these criteria is discussed below.

- (1) *Involves an irrevocable commitment to loss or destruction of any natural or cultural resource;*

The proposed activity will not result in the loss or destruction of natural or cultural resources. It will help to preserve and maintain the historic Chinese Cemetery of Manoa.

- (2) *Curtails the range of beneficial uses of the environment;*

The range of beneficial uses of the environment will not be curtailed.

- (3) *Conflicts with the states long-term environmental policies or goals and guidelines as expressed in Chapter 344, Hawaii Revised Statutes, and any revisions thereof and amendments thereto, court decisions or executive orders;*

The project does not conflict with long-term state environmental policies or goals.

- 4) *Substantially affects the economic or social welfare of the community or state;*

The proposed action will not substantially affect economic and social benefits of the community or state.

- (5) *Substantially affects public health;*

There will be no threat to public health by the use of the Chinese Cemetery pavilion for ballet classes and rehearsals.

- (6) *Involves substantial secondary impacts, such as: population changes or effects on public facilities;*

The project does not involve substantial secondary impacts such as population changes or effects on public facilities.

- (7) *Involves a substantial degradation of environmental quality;*

There will be minimal environmental impacts. Environmental quality will not be significantly degraded.

0000 00 12 1972

- (8) *Is individually limited but cumulatively has considerable effect upon the environment or involves a commitment for larger actions;*

The proposed action does not involve a commitment for a larger action nor does it result in significant adverse effects upon the environment.

- (9) *Substantially affects a rare, threatened or endangered species, or its habitat;*

There are no rare, threatened, or endangered species (plant or animal) on the project sites.

- (10) *Detrimentially affects air or water quality or ambient noise levels;*

There will be no impact on air or water quality. Noise associated with lessons and rehearsals will be minimal and easily mitigated.

- (11) *Affects an environmentally sensitive area such as a flood plain, tsunami zone erosion-prone area, geologically hazardous land, estuary, fresh water, or coastal waters.*

The proposed action does not affect any environmentally sensitive area.

- 12) *Substantially affects scenic vistas and viewplanes identified in county or state plans or studies.*

The proposed use will have no effect on scenic vistas or viewplanes.

- 13 *Requires substantial energy consumption.*

The proposed will not require substantial energy consumption.

Based on these significance criteria, it has been determined that the Final Environmental Assessment will not have a significant effect on the environment, and that a Finding of No Significant Impact (FONSI) is being filed with the State Office of Environmental Quality Control by the accepting agency, the Department of Planning and Permitting.

7. LIST OF PREPARERS

The following firms and individuals have volunteered their time to prepare this environmental assessment:

KRP InfoServices: Jacqueline A. Parnell, AICP, Environmental Planner.

MCM Planning: Marilyn C. Metz, AICP, Environmental and Land Use Planner

0000 00 12 1573

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

Julian Ng, Inc.: Julian Ng, Traffic Engineer

Darby & Associates: D. L. Adams, Acoustical Engineer

Char & Associates: Winona Char, Botanical Consultant

Bennett Mark, PE, AICP, Environmental and Land Use Planner

Colette Sakoda, Land Use Planner

0000 00 12 1974

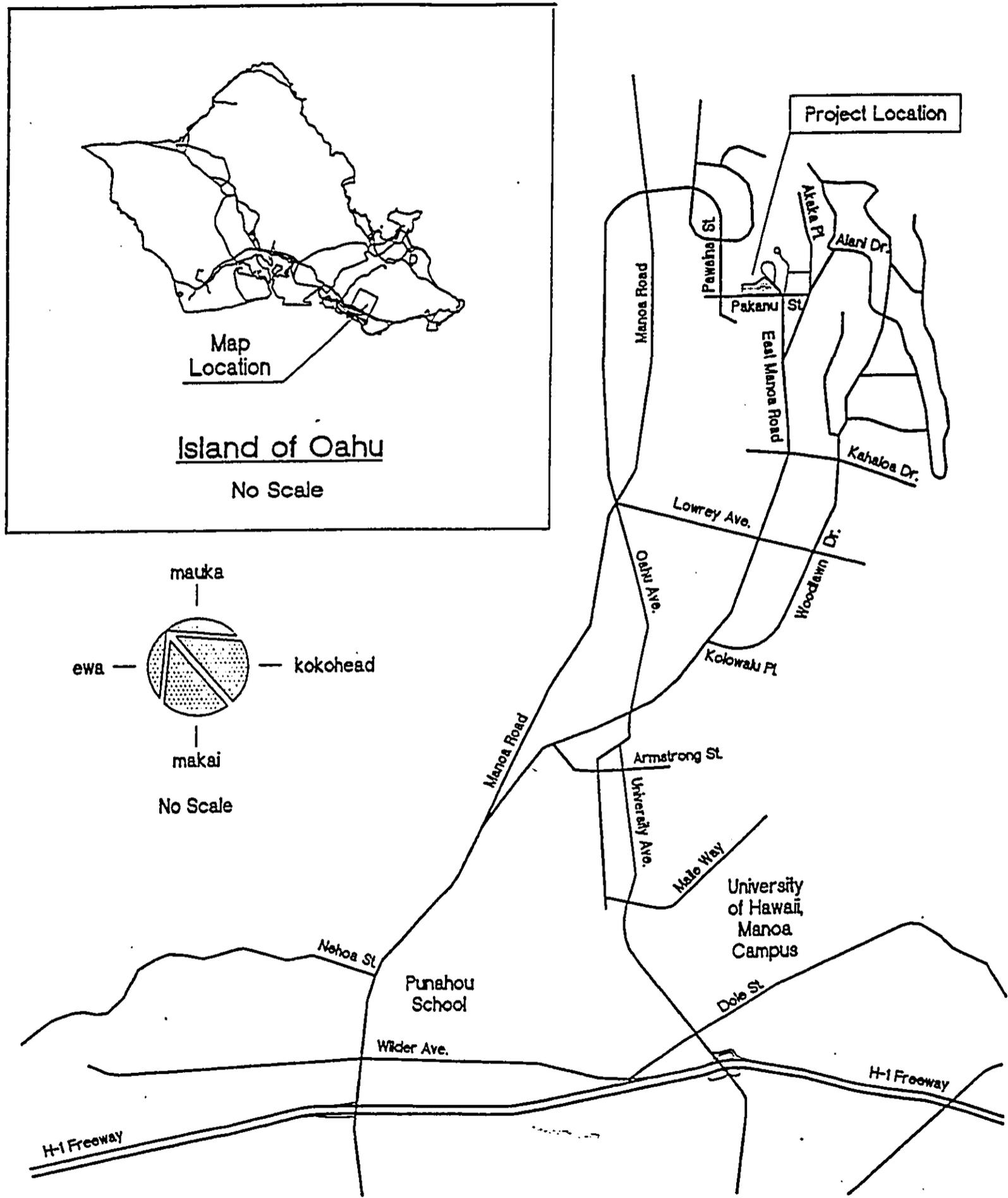


Figure 1
PROJECT LOCATION

0000 00 12 1576

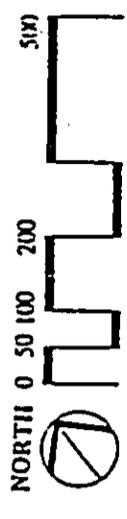
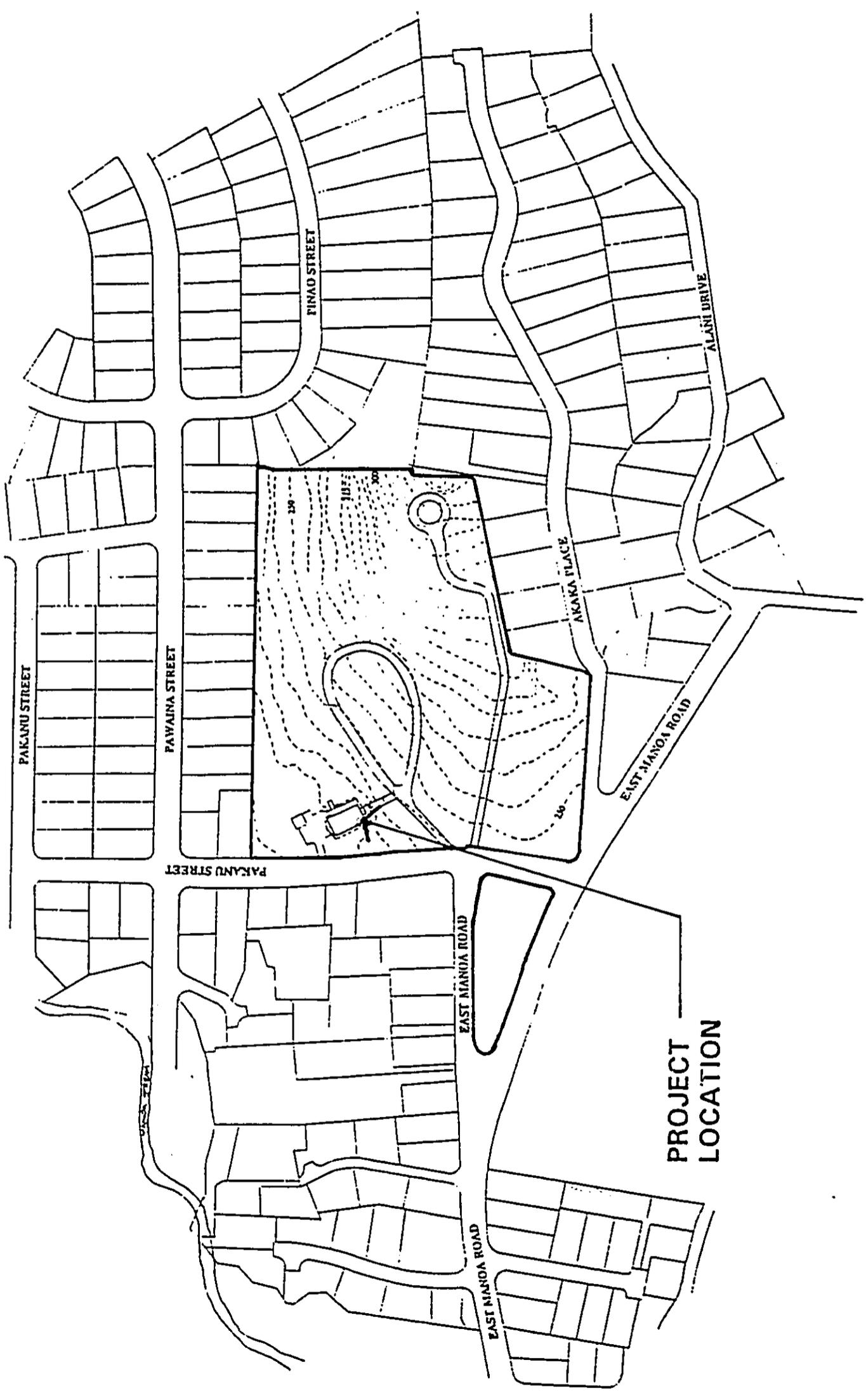


Figure 3
VICINITY MAP

0000 00 12 1977

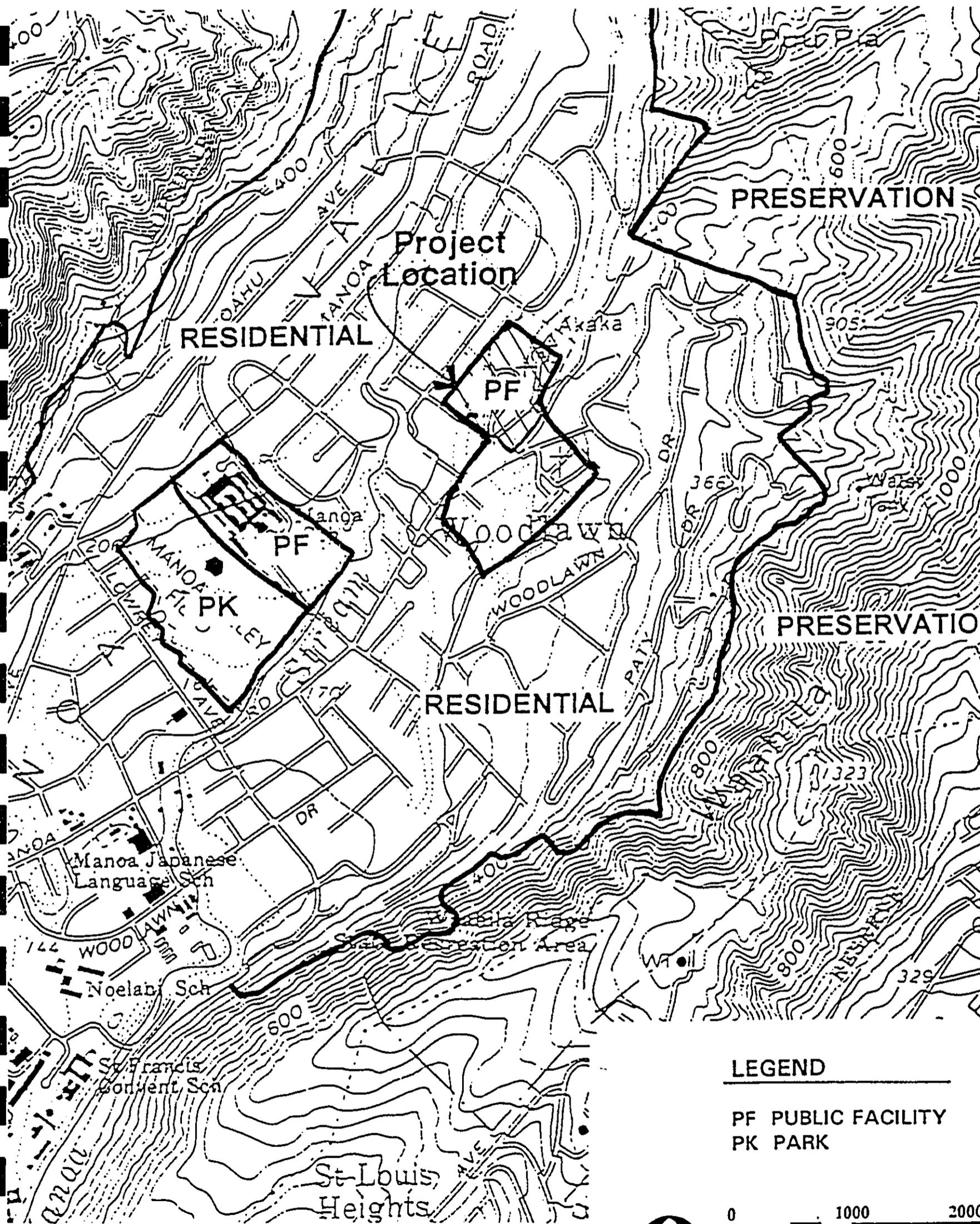
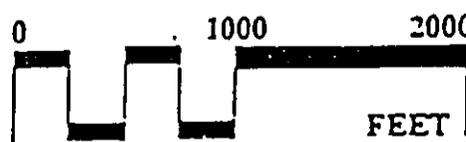


Figure 4
DP LAND USE MAP



LEGEND

PF PUBLIC FACILITY
PK PARK



FEET

0000 00 12 1978

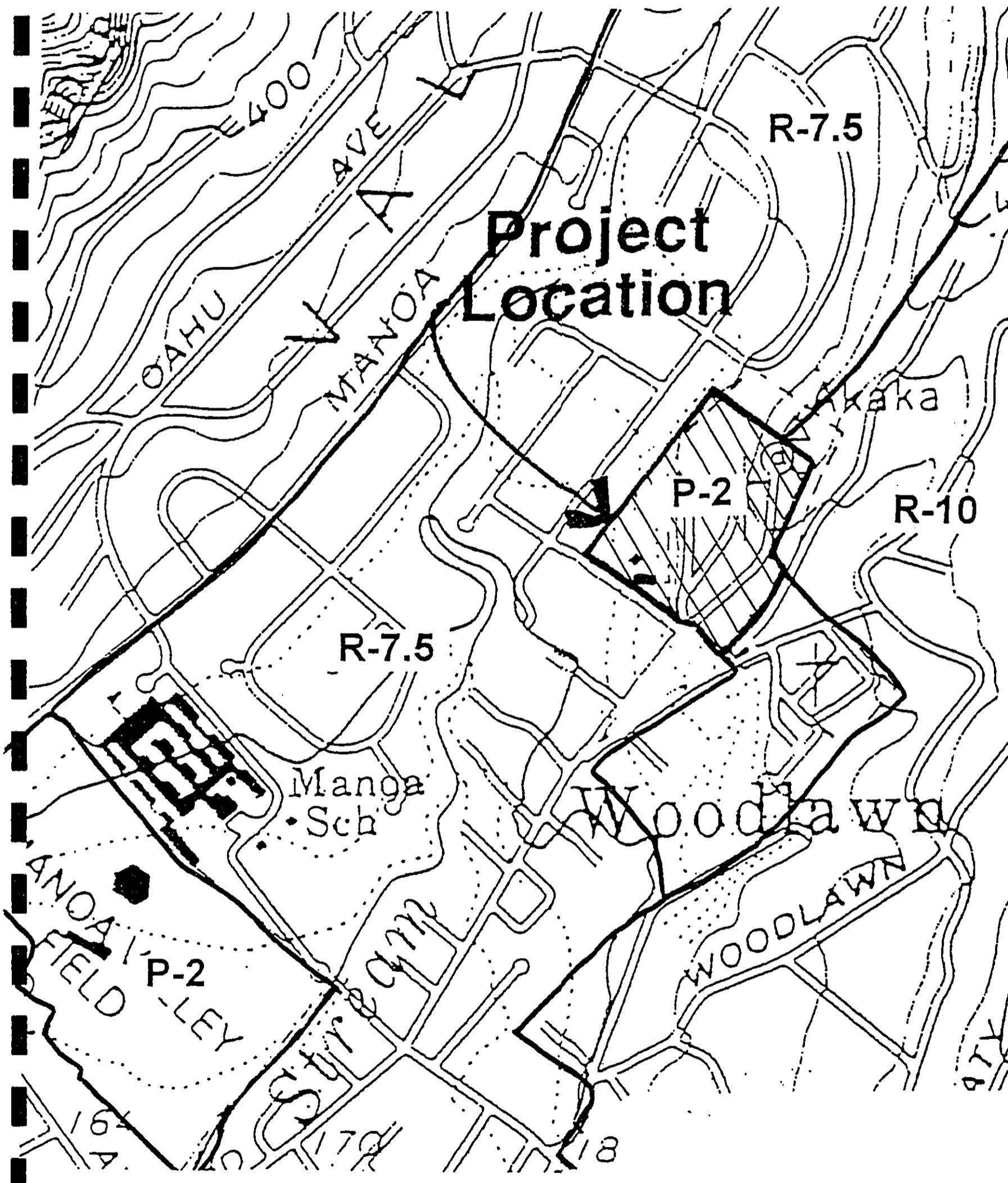
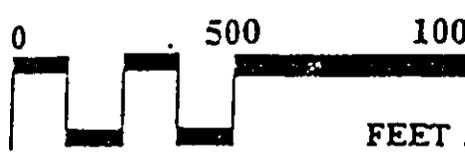


Figure 5
ZONING MAP



6751 11 00 0000

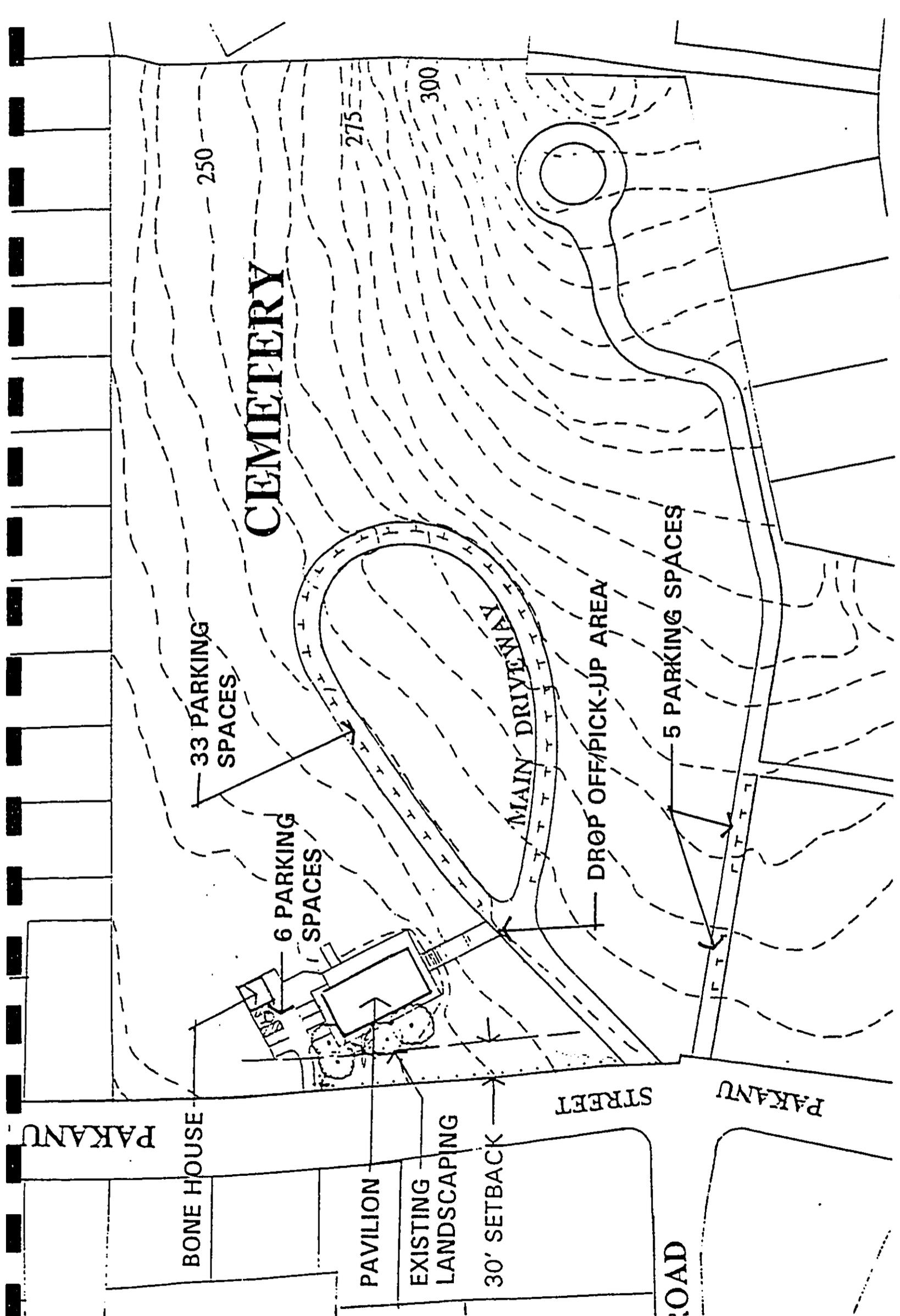
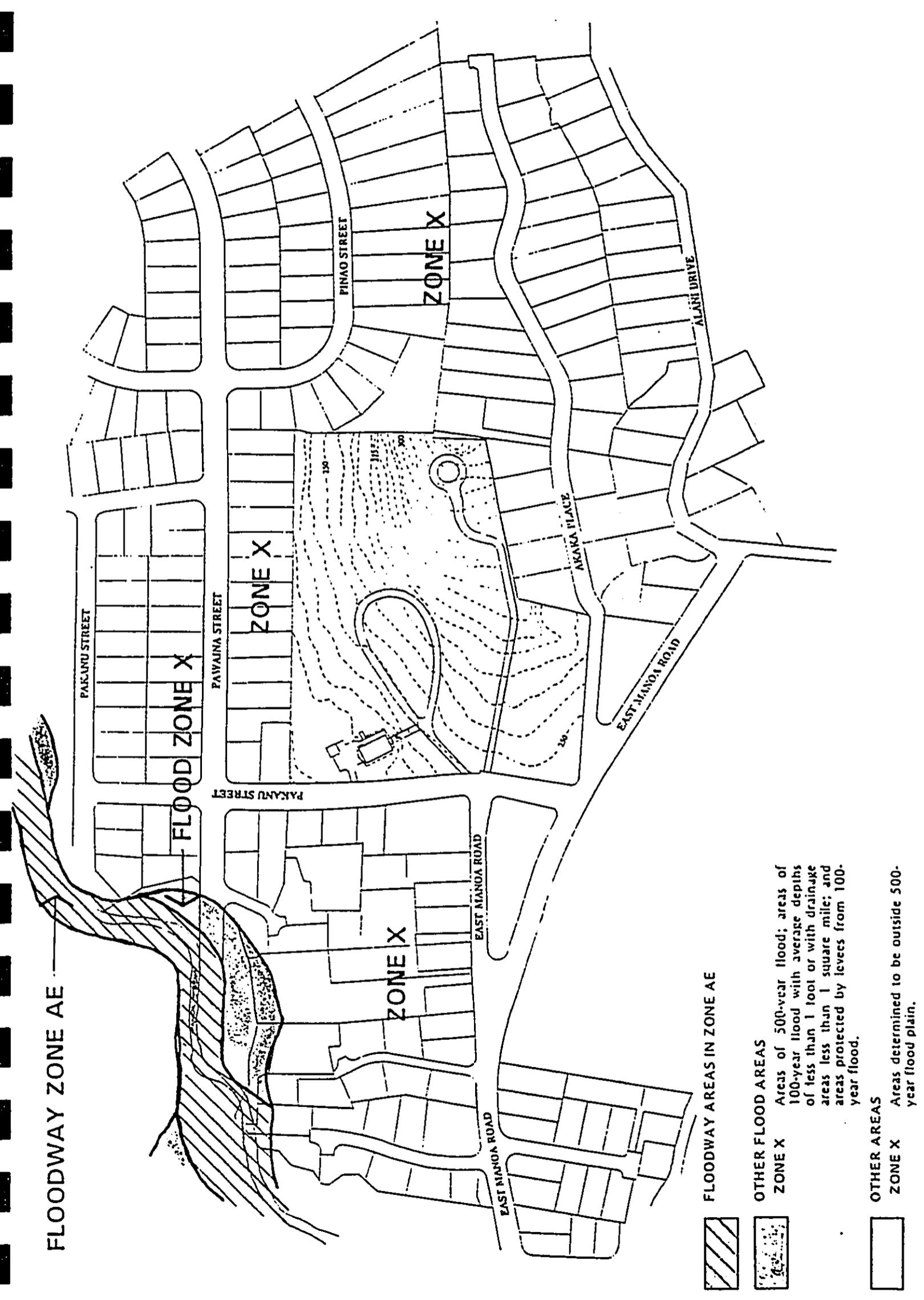


Figure 6
SITE PLAN

0000 00 12 1580



-  FLOODWAY AREAS IN ZONE AE
-  OTHER FLOOD AREAS
ZONE X Areas of 500-year flood; areas of 100-year flood with average depths of less than 1 foot or with drainage areas less than 1 square mile; and areas protected by levees from 100-year flood.
-  OTHER AREAS
ZONE X Areas determined to be outside 500-year flood plain.

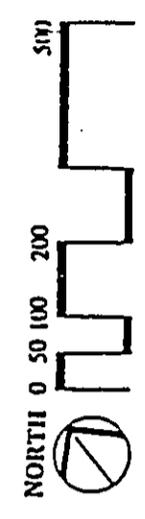


Figure 7
FLOOD ZONES
SOURCE: REDI Flood Insurance Rate Map

0000 00 12 1581

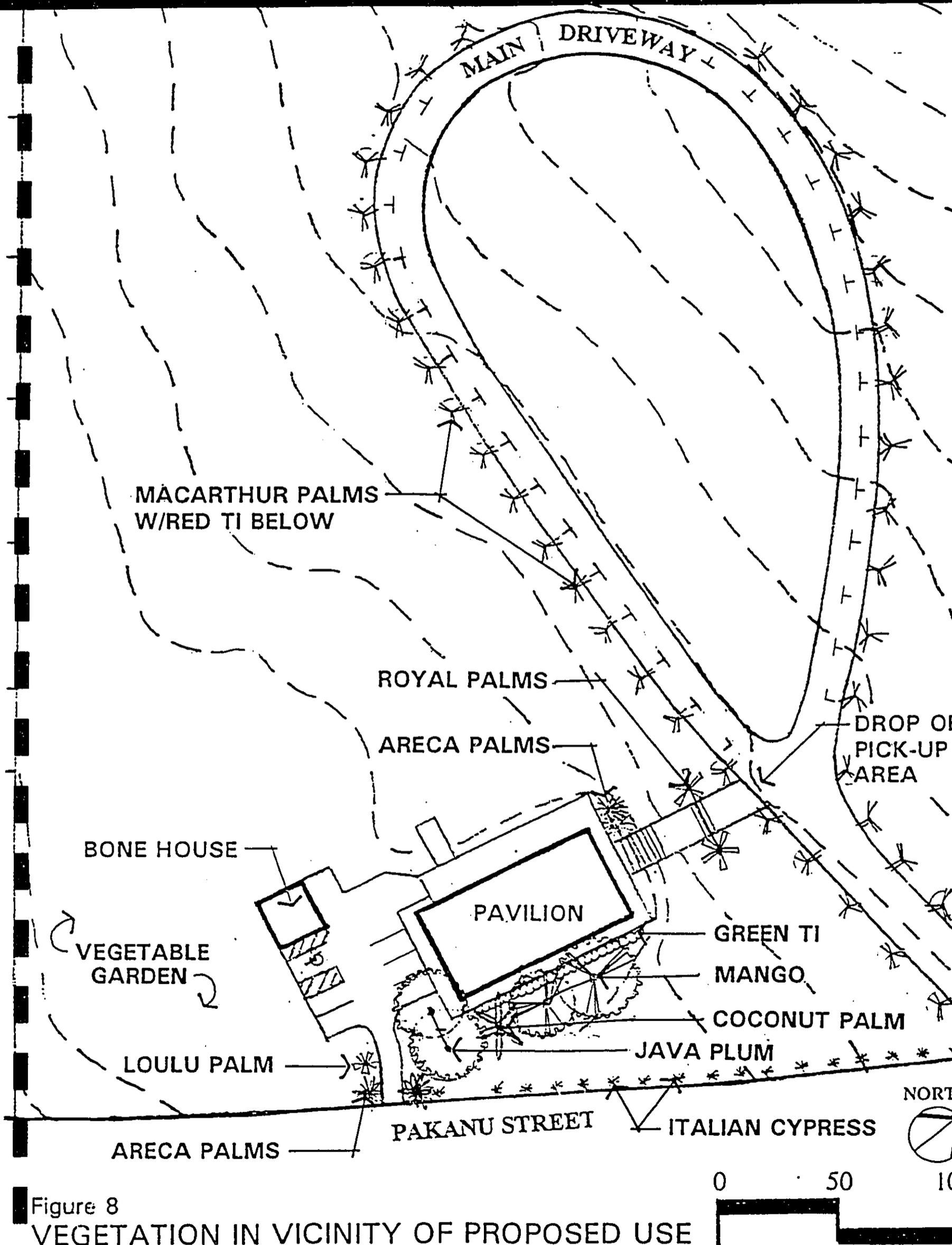
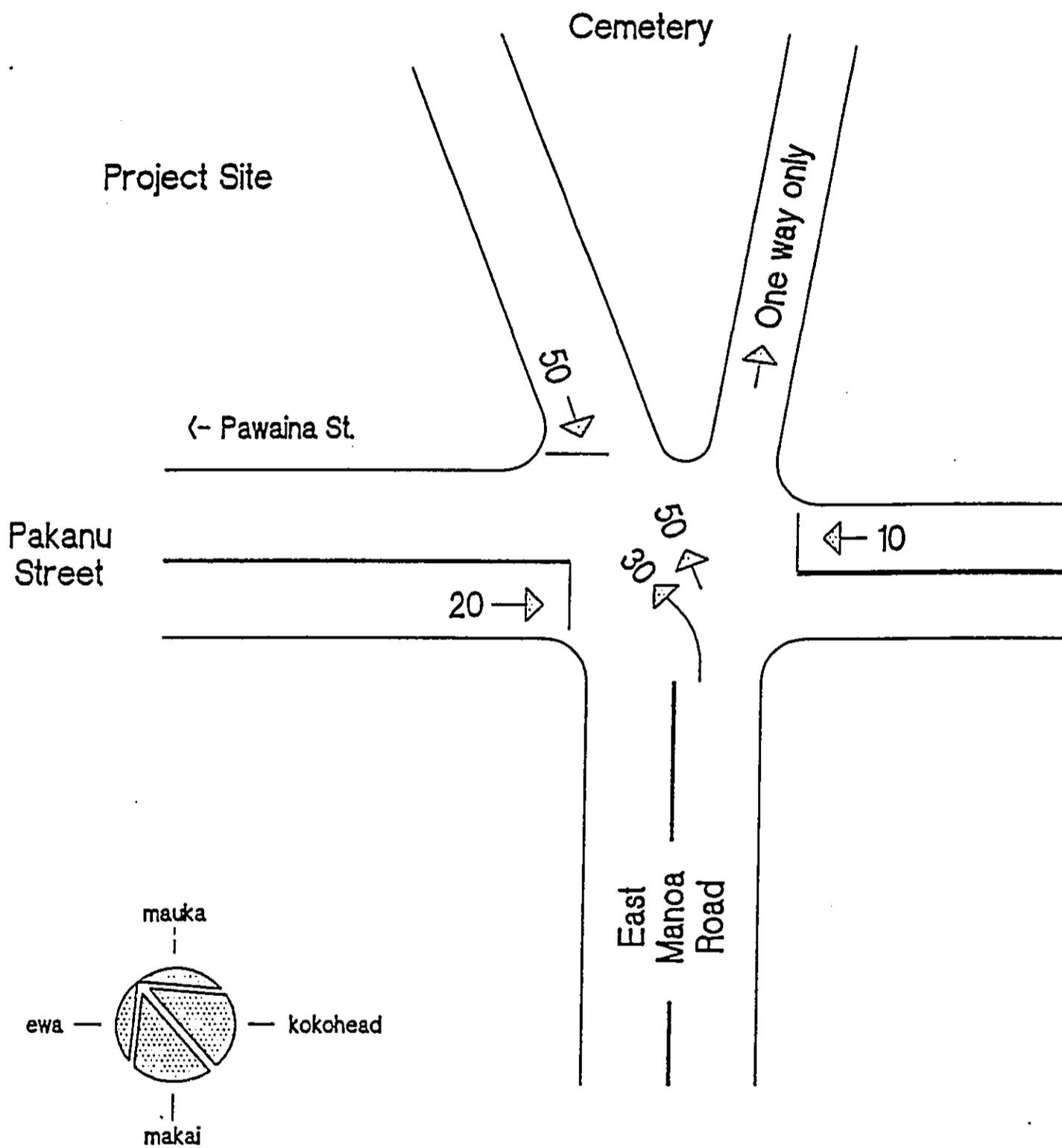


Figure 8
VEGETATION IN VICINITY OF PROPOSED USE



Note: Estimate of traffic volumes during the peak 15-minute period with project

Figure 9
PEAK TRAFFIC CONDITIONS

0000 00 12 1583

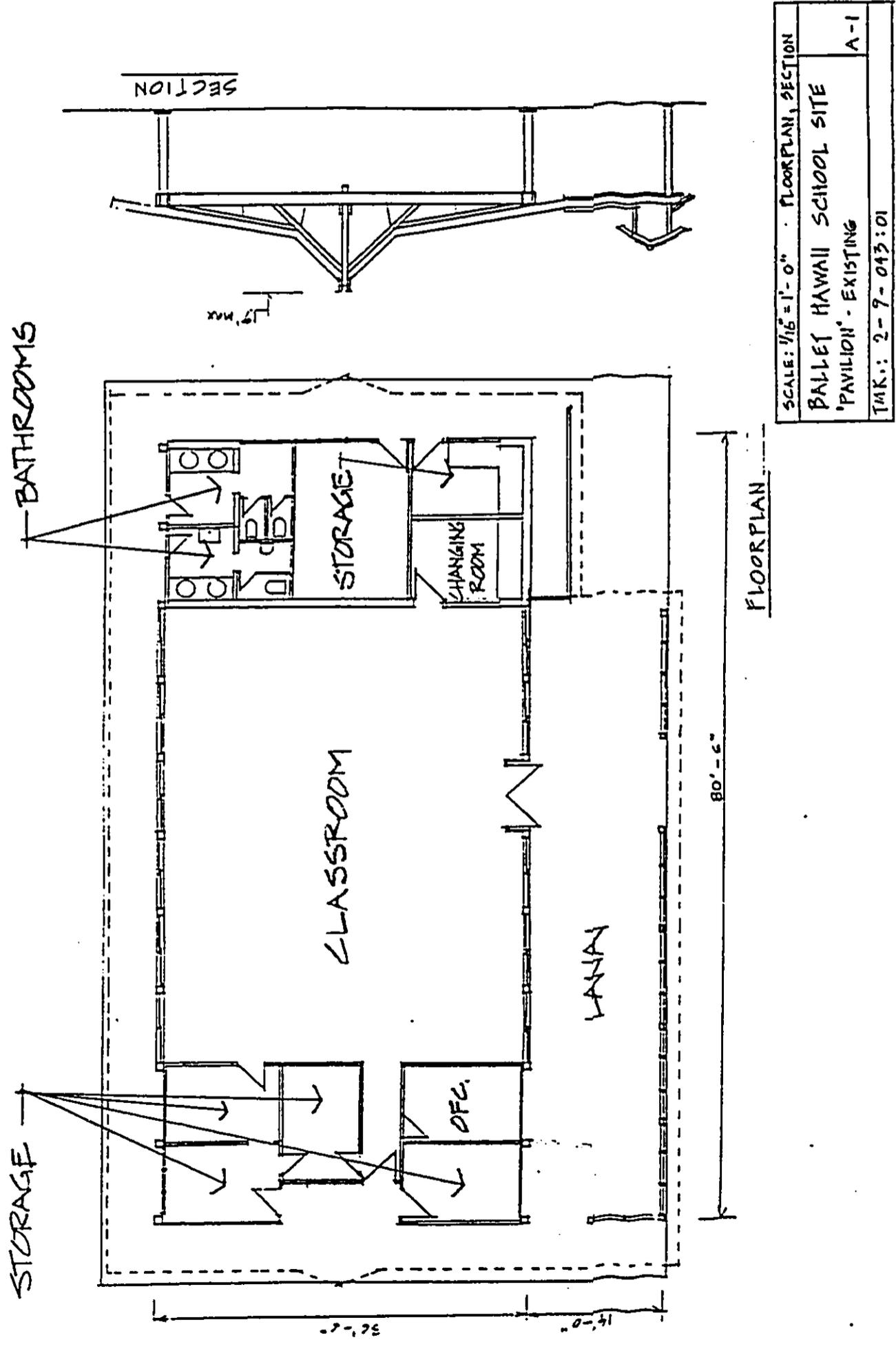
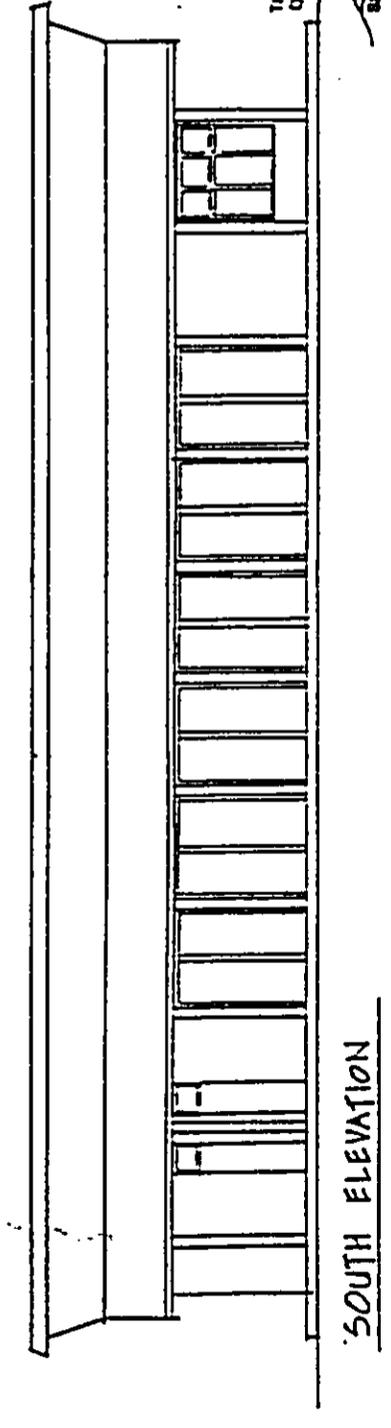
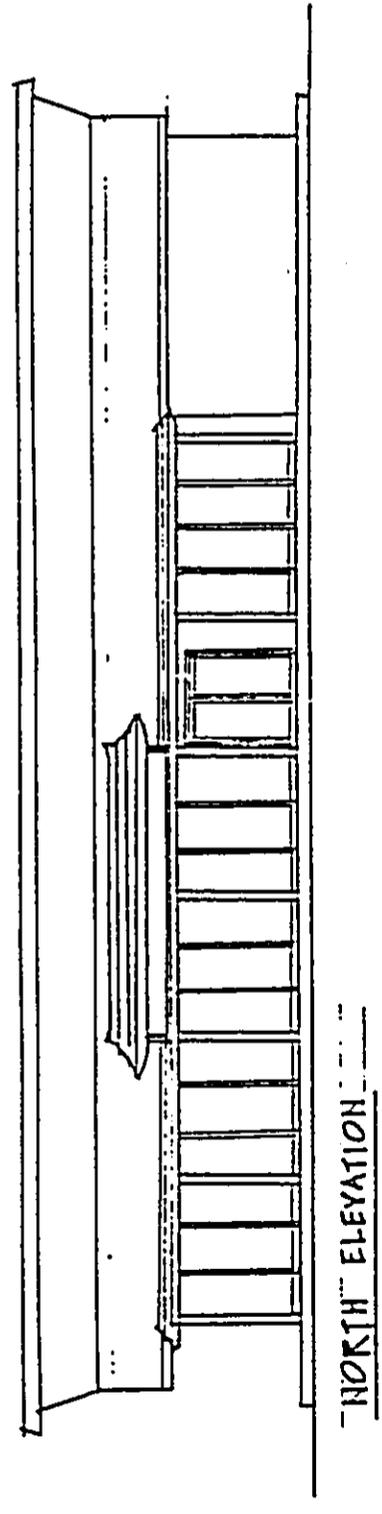


Figure 10
FLOOR PLAN

SCALE 1/16" = 1'-0"

0000 00 12 1584



THIS WORK WAS PREPARED BY ME
OR UNDER MY SUPERVISION.

Signature
SIGNATURE 9-6-78

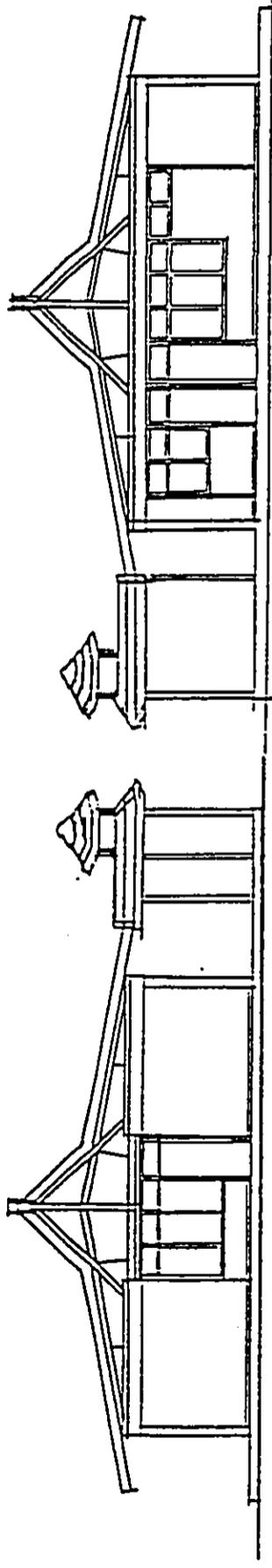


SCALE: 1/16" = 1'-0"	ELEVATIONS
BALLET HAWAII SCHOOL SITE	
'PAVILION' - EXISTING	
TAK: 2-9-043:01	
	A-2

Figure 11
NORTH/SOUTH ELEVATIONS

SCALE 1/16" = 1'-0"

0000 00 12 1585



EAST ELEVATION

WEST ELEVATION



THIS WORK WAS PREPARED BY ME
OR UNDER MY SUPERVISION.
[Signature]
SIGNATURE 8-6-88

SCALE: 1/16" = 1'-0"	ELEVATIONS
BALLET HAWAII SCHOOL SITE	
"PAVILION" - EXISTING	
TMK.: 2-9-043:01	
A-3	

Figure 12
EAST/WEST ELEVATIONS

0000 00 12 1586

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

APPENDIX A
ASSESSMENT OF BOTANICAL RESOURCES

0000 00 12 1987

CHAR & ASSOCIATES

Botanical/Environmental Consultants

4471 Puu Panini Ave.
Honolulu, Hawaii 96816
(808) 734-7828

MEMORANDUM

TO Steve Knox
Ballet Hawaii

FROM Winona P. Char *W.P. Char*

DATE 14 April 1998

SUBJECT Manoa Chinese Cemetery
Assessment of Botanical Resources

On 20 March 1998, an inspection was made of the vegetation around the building which is being proposed for the Ballet Hawaii headquarters; the building is located on the grounds of the Manoa Chinese Cemetery.

The vegetation around the building consists primarily of a grassy lawn composed primarily of Hilo grass (Paspalum conjugatum) with a weedy mixture of various other grasses such as Bothriochloa sp., West Indian dropseed (Sporobolus indicus), ricegrass (Paspalum scobiculatum), and Glenwood grass (Sacciolepis indica); and herbs and forbs which include yellow woodsorrel (Oxalis corniculata), oriental hawksbeard (Youngia japonica), kili'o'opu (Kyllinga brevifolia), Spanish clover (Desmodium incanum), puahilahila (Mimosa pudica), and sowthistle (Sonchus oleraceus).

A strip of Bermuda grass (Cynodon dactylon) is found beneath a row of Italian cypress trees (Cupressus sempervirens) facing Pakanu Street (makai side). Other woody components found along the makai side of the building include two large old common mango trees (Mangifera indica), Java plum (Syzygium cumini), and coconut (Cocos nucifera). On the mauka side, there are plantings of weeping willow (Salix babylonica) and various hybrid ti (Cordyline fruticosa), croton (Codiaeum variegatum), and Ixora. Also found here are sago palm (Cycas revoluta), banyan (Ficus sp.), golden fruited palm (Chrysalidocarpus lutescens), MacArthur palm (Ptychosperma macarthuri), and bowstring hemp (Sansevieria sp.). On the 'Ewa side of the building, there is a large vegetable and herb garden as well as two loulu palms (Pritchardia sp.).

0000 00 12 1588

None of the plants observed around the building is a threatened or endangered species; nor is any plant a species of concern (U.S. Fish and Wildlife Service 1997). None of the trees around the building is on the City and County of Honolulu's exceptional trees' list (Ordinance No. 78-91).

It is recommended that a dense planting of shrubs be put in between the Italian cypress trees along Pakanu Street. This would provide mitigation for noise and also screen the ballet activities from the street level.

References

U.S. Fish and Wildlife Service. 1997. U.S. Fish and Wildlife Service species list, plants. September 25, 1997. Pacific Islands Ecoregion Office, Honolulu, HI.

0000 00 12 1589

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

APPENDIX B

TRAFFIC ASSESSMENT

0000 00 12 1590

► **TRAFFIC ASSESSMENT**

**BALLET HAWAII, USE OF PAVILION AT
MANOA CHINESE CEMETERY**

► **HONOLULU, HAWAII**

► prepared for:

Ballet Hawaii

► prepared by:

Julian Ng, Incorporated
P. O. Box 816
Kaneohe, Hawaii 96744

► February, 1998

0000 00 12 1591

Traffic Assessment
Ballet Hawaii Use of Pavilion at Manoa Chinese Cemetery

Table of Contents

	<u>Page</u>
Existing Conditions	1
Table 1, Pakanu Street Traffic Volumes	2
Table 2, Pakanu Street Traffic Counts by Ballet Hawaii.....	2
Table 3, Traffic Counts, Other Parts of Manoa	3
Potential Impact of Project	3
Table 4, Unsignalized Intersection Conditions, Pakanu Street at East Manoa Road (ewa intersection)	4
Mitigation Measures	5
Figure 1, Project Location, Manoa Valley, Oahu	
Figure 2, Traffic Assignment	

0000 00 12 1592

Ballet Hawaii Use of Pavilion at Manoa Chinese Cemetery

Honolulu, Hawaii

Traffic Assessment

February, 1998

Ballet Hawaii, a dance education organization, is seeking a Conditional Use Permit to resume ballet instruction at the Manoa Chinese Cemetery pavilion site at 3225 Pakanu Street. This traffic assessment discusses the potential traffic impacts of the proposed use.

Existing Conditions

The pavilion that is proposed to be used by Ballet Hawaii is located on Pakanu Street, which with Pawaina Street, links East Manoa Road with Manoa Road in the back of Manoa Valley (Figure 1). Pakanu Street is an improved urban residential street with curbs and concrete sidewalks. Its 50-foot right-of-way includes a paved roadway that is 36 feet wide (between curb faces).

Approximately 600 feet makai of Pakanu Street, East Manoa Road splits into two roadways; the right (kokohead) leg continues beyond Pakanu Street and East Manoa Road terminates one block farther mauka at Alani Drive. The left leg terminates at Pakanu Street. At both intersections, Pakanu Street traffic is stop-controlled. At the ewa intersection, two driveways serving the Chinese Cemetery also meet Pakanu Street on the mauka side.

The kokohead driveway serves mauka-bound traffic departing the intersection, providing vehicular access to a portion of the cemetery; traffic exiting this part of the cemetery is directed out onto Akaka Place. The ewa driveway serves two-way traffic and the makaibound approach has a stop sign.

Access to the pavilion is provided by the paved ewa driveway. The driveway is constricted near the entrance to a width of eighteen feet, but is typically twenty to twenty-two feet wide between curbs. Parking parallel to the curb is permitted. An asphalt ramp is provided near the pavilion to allow access to a grassed area which is used for overflow parking.

Traffic in the area is typically low. While Pakanu Street is a local street providing access to abutting properties, the block between East Manoa Road and Pawaina Street is an important link between the two sides of Manoa Valley.

Traffic volumes on Pakanu Street between East Manoa Road and Pawaina Street are estimated to be 2,000 vehicles per day (weekday), based on a machine count taken in May, 1995 (Source: City and County of Honolulu, Department of Transportation Services). Peak hourly traffic volumes were estimated from these counts and manual counts taken on three Saturdays in the fall of 1997 by Ballet Hawaii:

Table 1
Pakanu Street Traffic Volumes

	<u>kokoheadbound</u>	<u>ewabound</u>
Weekday (24-hour)	900 vpd	1,100 vpd
AM Peak Hour	95 vph	50 vph
PM Peak Hour	75 vph	100 vph
Saturday Peak Hour	75 vph	70 vph

(vpd = vehicles per day, vph = vehicles per hour)

Traffic data collected by Ballet Hawaii on Pakanu Street, between Pawaina Street and East Manoa Road (west leg at Pakanu Street) are:

Table 2
Pakanu Street Traffic Counts by Ballet Hawaii

Pakanu Street	<u>kokoheadbound</u>			<u>ewabound</u>		
	<u>A</u>	<u>B</u>	<u>C</u>	<u>A</u>	<u>B</u>	<u>C</u>
Saturday,						
8:30 AM - 9:00 AM	-	-	31	-	-	18
9:00 AM - 9:30 AM	15	27	32	12	24	31
9:30 AM - 10:00 AM	39	38	-	24	28	-
10:00 AM - 10:30 AM	36	35	-	29	34	-
10:30 AM - 11:00 AM	30	20	-	32	11	-
11:00 AM - 11:30 AM	42	29	-	39	25	-
11:30 AM - 12 noon	17	22	-	27	40	-
12 noon - 12:30 PM	28	-	-	35	-	-
12:30 PM - 1:00 PM	22	-	-	34	-	-
1:00 PM - 1:30 PM	24	20	-	33	35	-
1:30 PM - 2:00 PM	-	29	-	-	41	-

A: September 27, 1997, B: October 4, 1997, C: October 11, 1997

The volumes shown above represent "normal" conditions on Pakanu Street between Pawaina Street and the ewa intersection with East Manoa Road over most of the year. On-street parking, while available, is rarely used, as there are only four houses along Pakanu Street near Pawaina Street; a plant nursery and the cemetery abut the remainder of the block.

During Ching Ming, a one-month period beginning in late-March or early-April of each year, visitation to the cemetery increases as family and friends gather to honor their ancestors in a traditional manner. Traffic volumes and parking demands increase; on-street parking is sometimes difficult to find and some traffic congestion occurs on weekends. While these conditions are worse than the "normal" conditions described above, these conditions occur only for a limited time.

The City and County of Honolulu Department of Transportation Services has also collected traffic count data at several other locations within Manoa Valley over the past ten years. Total traffic volumes entering various intersections that may be affected by project traffic are shown below:

Table 3
Traffic Counts, Other Parts of Manoa

Total traffic approaching the intersection of:	Weekday (24-hour)	Peak Hour	
		AM	PM
Pawaina St. and Pakanu St.	2,006	146	169
East Manoa Rd. and Kahaloa Dr.	6,667	600	598
East Manoa Rd. and Kolowalu Pl.	23,236	1,656	1,814
East Manoa Rd. and Oahu Ave.	28,817	2,278	2,317
University Ave. and Armstrong St.	17,442	961	1,298
University Ave. and Maile Way	28,989	1,390	2,712
East Manoa Rd. and Manoa Rd.	24,584	2,425	2,078
Manoa Rd. and Nehoa St.	37,653	3,755	3,278

Source: City and County of Honolulu, Department of Transportation Services

Potential Impact of Project

The proposed project will increase traffic in the area during the times when classes are held, as parents arrive to drop off or pick up students. Short-term parking demand will increase due to drop-off or pick-up activities, and for parents who decide to wait.

Use of the pavilion by Ballet Hawaii will only occur when the pavilion is not used for its primary activity during Ching Ming. Therefore, the potential traffic impact of the project is on the "normal" conditions. The highest hourly traffic on Pakanu Street under "normal" conditions is 175 vehicles per hour during the weekday PM Peak Hour.

Ballet Hawaii holds classes and rehearsals on weekday afternoons and on Saturdays, between 8:30 AM and 2:30 PM. Sessions are typically 30 minutes to 1 ½ hours long. The most significant traffic impact would be expected between two classes, when traffic due to departing students and arriving students occur simultaneously.

Ballet Hawaii has indicated that their class sizes range from less than ten students to 22 students. While some of these may be siblings or friends who would travel together, a liberal estimate would be that the proposed use would have an impact of 45 vehicles arriving and 45 vehicles departing the site within a 15-minute period. Figure 2 shows an estimate of the worst-case traffic volumes at the intersection of Pakanu Street and East Manoa Road.

Figure 2 indicates that the traffic due to the proposed use could create a significant increase in traffic in the area during the times when classes change. A capacity analysis of the unsignalized intersection (the 15-minute volumes were increased fourfold to a vehicles per hour flow rate for the analysis) showed adequate capacities as delays to stopped vehicles would be minimal. Under more realistic conditions where the project traffic should be less than the worst-case volumes indicated in Figure 2, delays would be less than shown.

Table 4
Unsignalized Intersection Conditions
Pakanu Street at East Manoa Road (ewa intersection)

	average delay <u>per vehicle</u>	Level of <u>Service</u> ^a
Pakanu Street, ewabound (stop)	7.5 seconds	B
kokoheadbound (stop)	4.2 seconds	A
Cemetery driveway (stop)	3.5 seconds	A

^a Levels of Service (LOS) range from "A" (minimal delay) to "F" (very long delays); LOS C is "average delay" and LOS D is considered acceptable

On a broader perspective, the traffic impact of the project on conditions elsewhere in Manoa will be proportionally less, as traffic volumes increase toward

0000 00 12 1596

the front of the valley. At East Manoa Road and Kolowalu Place, for example, the worst-case estimate of 90 vehicles per hour (45 each way) would be less than 5% of the existing traffic using the intersection (the PM count was 1,814 vehicles per hour).

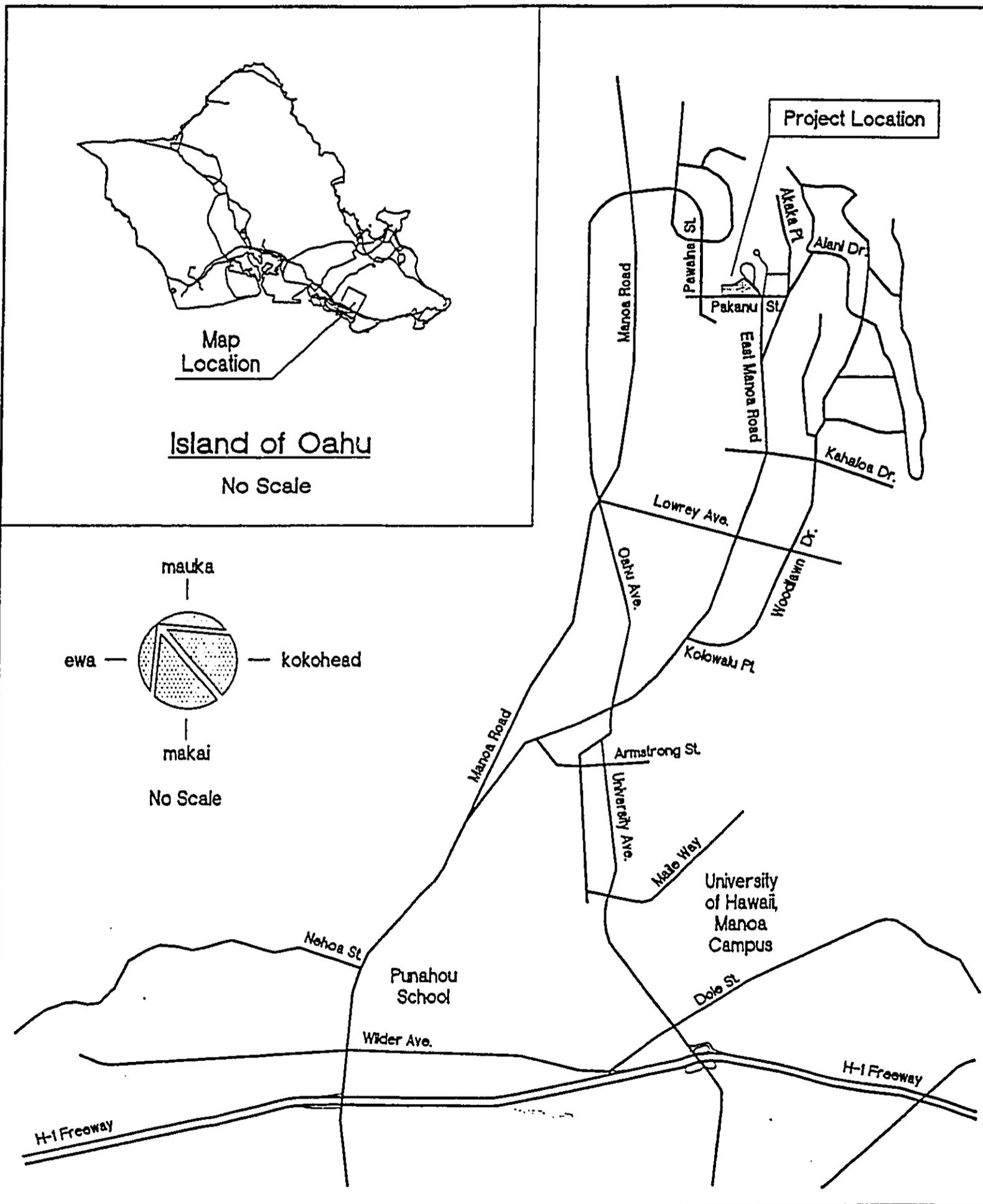
Two factors also help to mitigate the project impact closer to the front of the valley. The network of streets will distribute the project-related traffic depending on the origin or destination of the trip; the project traffic would use either East Manoa Road and University Avenue. The second factor is the location of the homes of the students; Ballet Hawaii reports that one-third of their students reside in the Manoa and Makiki areas. Therefore, some of the traffic due to the project will not affect streets in the front of the valley. Equally important, under existing conditions where Ballet Hawaii is located elsewhere, these trips from Manoa would still be made.

The project impact is not expected to be significant. The increase in traffic, even on a worst-case basis, is significantly less than the "100 added vehicle trips in the peak direction (inbound or outbound) during the site's peak traffic hour"* that the Institute of Transportation Engineers has suggested as a criteria for a site traffic impact access or impact study.

Mitigation Measures - No mitigation measures will be necessary for potential traffic impacts of the project. Parking will be provided along the cemetery driveway; additional parking is available on the grassed area next to the pavilion. As a mitigation measure to minimize impacts to Pakanu Street, Ballet Hawaii should encourage students and parents to use the cemetery roadway rather than Pakanu Street for drop-off, parking, or pick-up; this can be reinforced by directing all students to only use the doorway that faces the cemetery.

* Institute of Transportation Engineers, *Traffic Access and Impact Studies for Site Development, A Recommended Practice*, 1991.

0000 00 12 1597



Traffic Assessment
 Ballet Hawaii Use of Pavilion
 at Manoa Chinese Cemetery

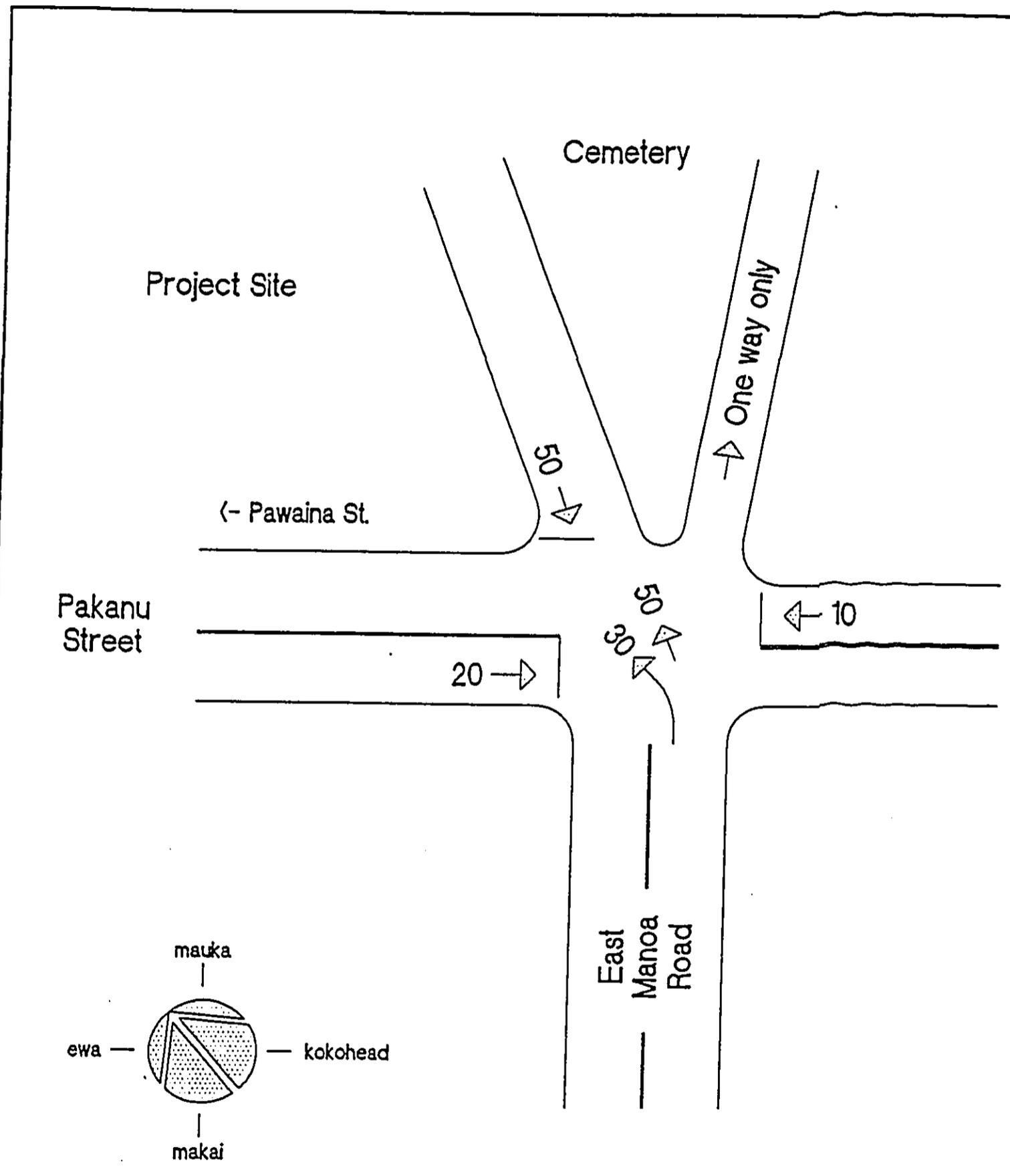
Project Location
 Manoa Valley, Oahu

Figure
 1

prepared by: Jufan Ng, Inc.

February, 1998

PACALISEB 12/12/98 2423



Note: Estimate of traffic volumes during the peak 15-minute period with project

Traffic Assessment
 Ballet Hawaii Use of Pavilion
 at Manoa Chinese Cemetery

Traffic Assignment

prepared by: Julian Ng, Inc. February, 1998

Figure
 2

PAKANU ST 2/2/98 2:33

0000 00 12 1599

會義聯那萬

Lin Yee Chung Association

(MANOA CHINESE CEMETERY)

ELEEMOSYNARY

3430 E. MANOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

October 1998

Parking Agreement between Lin Yee Chung Association and Ballet Hawaii

The Lin Yee Chung Association and Ballet Hawaii agree to jointly utilize all available parking areas located within the grounds of the Manoa Chinese Cemetery, Tax Map Key no. 2-9-043:001. Ballet Hawaii will relocate its Saturday dance classes each year during the Association's annual Ching Ming celebration April 5 through May 5.

Winfred K. W. Lum 10/26/98
Winfred K. W. Lum Date
Lin Yee Chung Association

Steve Knox 10/28/98
Steve Knox Date
Ballet Hawaii

0000 00 12 1600

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

APPENDIX C
ENVIRONMENTAL NOISE ASSESSMENT

0000 00 12 1601



D. L. ADAMS ASSOCIATES, LTD.

dba

DARBY & ASSOCIATES

ACOUSTICAL CONSULTANTS

**ENVIRONMENTAL NOISE ASSESSMENT
OF PROPOSED BALLET HAWAII SCHOOL SITE
AT MANOA CHINESE CEMETARY
MANOA, HONOLULU, HAWAII**

February 13, 1998

Prepared for
BALLET HAWAII
Honolulu, Hawaii

0000 00 12 1602

TABLE OF CONTENTS

<u>Section</u>	<u>Description</u>	<u>Page</u>
1.0	Summary	1
2.0	Description of Proposed Use	2
3.0	Noise Guidelines and Standards	2
4.0	Existing Acoustical Environment	3
5.0	Analyses of Noise Impacts Due to the Proposed Use	4
6.0	Conclusion	5
	References	6
	Appendix A - Acoustical Terminology	
<u>Figure</u>		
1	City and County of Honolulu, Department of Land Utilization, Land Use Ordinance, Maximum Sound Pressure Levels	

1.0 SUMMARY

- 1.1 D. L. Adams Associates, Ltd.(d/b/a Darby & Associates) has investigated the potential noise impact that would result from Ballet Hawaii's use of the pavilion building at the Manoa Chinese Cemetery, 3225 Pakanu Street in Honolulu for ballet instruction.
- 1.2 The proposed ballet school site and the adjacent residential area currently experience daytime ambient sound levels (L_A) of 42 to 48 dBA with no local traffic and 56 to 68 dBA with local traffic. This is typical of suburban residential communities. The dominant noise sources consist of local vehicular traffic, wind-in-foliage, insects, animals (birds and dogs), and occasional buses on East Manoa Road.
- 1.3 The increase in traffic on local streets due to the proposed use by Ballet Hawaii would result in an insignificant increase (less than 1.0 dB) in peak-hour, traffic-generated equivalent sound levels (L_{eq}). A traffic noise level increase of less than 1 dB is well below the threshold change in noise of 3 dB that is perceptible to most people with normal hearing.
- 1.4 Use of the pavilion building for ballet classes and rehearsals is proposed for daytime hours only, i.e., between 8:30 A.M. and 7:30 P.M., Monday through Saturday and occasional Sunday use from 12:00 noon to 4:00 P.M., with the following exception. From September through December the hours may be extended until 9:30 P.M. for Nutcracker Suite rehearsals.
- 1.5 Noise generated by the ballet school activities, i.e., a piano and voices of instructors and students, will not significantly increase the ambient daytime or evening noise levels.
- 1.6 For ballet school activities during the evening hours, i.e., 7:30 to 9:30 P.M., September through December, when the background noise levels are lower, the noise from the school may be more discernable and, possibly, a source of auditory annoyance to some nearby residents, noise mitigation in the form of closing the sliding doors on the south side of the pavilion building would effectively reduce the noise propagating to the nearby homes.
- 1.7 The use of sound amplification equipment for certain rehearsals or classes requiring the playback of recorded music could potentially impact the nearby residential area, but noise mitigation in the form of closing the sliding doors on the south side of the building, properly locating the loudspeakers and restricting the volume of the system, either manually or automatically, will effectively control the noise propagating to the nearby homes.

2.0 DESCRIPTION OF PROPOSED USE

Ballet Hawaii, a non-profit dance education organization, is seeking a Conditional Use Permit to conduct ballet instruction at the pavilion site of the Manoa Chinese Cemetery at 3225 Pakanu Street in Manoa, Honolulu, Hawaii. The parcel on which the cemetery pavilion is located is zoned P-2. The variance request is for use of the pavilion building, originally constructed for Ching Ming celebration activities which take place from April 5 to May 5 each year.

3.0 NOISE GUIDELINES AND STANDARDS

Various local and federal agencies have established guidelines and standards for assessing environmental noise impacts and setting noise limits as a function of land use. A brief description of common acoustical terminology used in these guidelines and standards is presented in Appendix A.

3.1 State Department of Health

The Hawaii Department of Health (DOH) defines three classes of zoning districts and specifies corresponding maximum permissible A-weighted sound levels (dBA) due to *stationary* noise sources, such as air-conditioning units, exhaust systems, generators, compressors, pumps, etc., and equipment related to agricultural, construction and industrial activities [Reference 1]. Since this state-wide noise ordinance is applicable only to stationary sources and equipment related to agricultural, construction and industrial activities, it is not applicable in this case.

3.2 City and County of Honolulu Land Use Ordinance

The City and County of Honolulu Land Use Ordinance (LUO) [Reference 2] specifies maximum octave band sound pressure levels that should not be exceeded for various land use categories. These are represented graphically in Figure 1. The implication of this noise regulation is that the noise being assessed is an instantaneous measure, rather than a time averaged measure. The noise sources emanating from the Ballet Hawaii school will not be steady state nor continuous, thus, since the level and frequency content of voice and music are constantly changing, any instantaneous reading would most likely not represent worst case and would most likely be in compliance with these maximum octave band sound pressure levels. However, the daytime octave band sound pressure levels of the ordinance for residentially zoned properties corresponds to an A-weighted sound level of 56 dBA. This is a value that can be assessed and/or measured instantaneously.

3.3 U. S. Environmental Protection Agency

The U. S. Environmental Protection Agency (EPA) has identified a range of yearly day-night equivalent sound levels (L_{dn}) sufficient to protect public health and welfare from the effects of environmental noise [Reference 3]. The EPA has established a goal to reduce exterior environmental noise to an L_{dn} not exceeding 65 dBA and a future goal to further reduce exterior environmental noise to an L_{dn} not exceeding 55 dBA. The EPA has also stated that these goals are not intended as regulations as it has no authority to regulate noise levels, but rather the levels are intended to be viewed as levels below which the general population will not be at risk from any of the identified adverse effects of noise.

3.4 U. S. Federal Highway Administration

The Federal Highway Administration (FHWA) has established design goals for traffic noise exposure [Reference 4]. It defines four land use categories and assigns corresponding maximum hourly equivalent sound levels ($L_{eq(h)}$) for each. Category B includes residences for which the exterior $L_{eq(h)}$ is 67 dBA and the interior $L_{eq(h)}$ is 52 dBA. These limits are viewed as design goals and all projects which are developed to meet these limits are deemed in conformance with the FHWA noise standards.

3.5 State Department of Transportation, Highways Division

The Hawaii Department of Transportation, Highways Division (DOH) has adopted FHWA's design goals for traffic noise exposure in its analysis and abatement policy [Reference 5]. The policy states that a traffic noise impact occurs when the predicted traffic noise levels "approach" or exceed the FHWA's design goals or when the predicted traffic noise levels "substantially exceed the existing noise levels." As defined in the policy, "approach" means at least 1 dBA less than FHWA's design goals and "substantially exceed the existing noise levels" means an increase of at least 15 dBA.

4.0 EXISTING ACOUSTICAL ENVIRONMENT

A noise survey was conducted in the vicinity of the Manoa Chinese Cemetery pavilion building between the hours of 5:45 and 6:30 P.M. on October 11, 1996 [Reference 6]. In the absence of traffic on local streets--Pakanu Street, Akaka Street and East Manoa Road--sound levels in the range of 42 to 48 dBA were measured. With vehicular traffic on local streets the measured sound levels ranged from 56 to 68 dBA. A sound level of greater than 70 dBA, resulting from a motorcycle pass by, was noted.

5.0 ANALYSES OF NOISE IMPACTS DUE TO THE PROPOSED USE

5.1 Traffic Noise

Based on a recently conducted traffic analysis [Reference 7], existing morning and afternoon peak hour traffic flow rates on Pakanu Street are estimated to be 145 and 175 vehicles per hour, respectively. In addition, the Saturday peak-hour traffic volume on Pakanu Street is 145 vehicles per hour. With Ballet Hawaii using the pavilion, the highest hourly traffic on Pakanu Street is projected to be 175 vehicles per hour, during the weekday PM peak hour, i.e., no change from the existing estimated PM peak hour traffic volume. Under a "worst case" scenario, i.e., between classes on Saturday when parents are dropping off and picking up students, the projected peak hour traffic volume could be as high as 240 vehicles per hour. This "worst case" scenario assumes that each of the dance classes--the one ending and the one starting--has 22 students and that each student arriving and departing is in a separate vehicle. While possible, this "worst case" scenario is unlikely to occur because of car-pooling and the fact that one-third of the Ballet Hawaii students reside in the Manoa/Makiki area. As such, many will probably walk or bicycle to class.

In general, a 100% increase in the number of vehicles will result in a 3 dB increase in traffic-generated noise. Three decibels is considered to be the Threshold of Perceptible Sound Level Change for humans. In other words, the sound level from a given source must increase or decrease at least 3 dB in order for a human to detect that a change in level has occurred.

The "worst case" scenario projects a 66% increase in peak hour traffic volume, i.e., an increase of 90 vehicles trips during the peak hour. The increase in peak hour traffic noise level resulting from a 66% increase in traffic volume will be 2 dB or less. As stated in the preceding paragraph, such a small increase would not be perceptible and, therefore, it is not significant.

Furthermore, the existing maximum hourly equivalent sound level, $L_{eq(h)}$, estimated from the sound level measurements taken in October, 1996 [Reference 6] with local traffic present, is in the range of 53 to 56 dBA. An increase in $L_{eq(h)}$ of less than 2 dB over the existing ambient noise levels is estimated to result from the additional traffic generated by the school under the "worst case" scenario. In accordance with the FHWA noise standards for residences [Reference 4] and the DOT noise standards, this does not constitute a noise impact.

5.2 School Noise

Sound level measurements were conducted in the vicinity of the pavilion site under varying conditions with a piano playing in the pavilion building [Reference 6]. Measurements at two locations across Pakanu Street with the sliding doors open

yielded a level of 40 dBA without local traffic and levels of 52 to 68 dBA with local traffic. Measurements on the southwest corner of Pakanu Street and East Manoa Road yielded 41 to 56 dBA with the pavilion doors closed and no local traffic.

Measurements on the same corner with the doors closed and local traffic yielded levels that ranged from 63 to 69 dBA. From these measurement results, it can be seen that the major contributor to the noise environment was traffic and not the piano.

Another acoustical consultant has performed a theoretical analysis, based on distance alone, which indicated sound levels within the pavilion building due to piano, voices and/or sound amplification equipment could be as high as 91 dBA without exceeding 55 dBA at the property line of the residence on the southwest corner of Pakanu Street and East Manoa Road with the sliding doors open [Reference 8]. Such high levels inside the pavilion building would be excessively loud and would not be expected, since such high music levels would interfere with the dance teacher's being heard by the students. Having direct experience with ballet schools as a result of his daughters' and granddaughters' participation, he has predicted the sound levels would not exceed 65 dBA on the dance floor for more than 10% of the time.

Therefore, the A-weighted equivalent of the LUO maximum octave band sound pressure levels for residential properties is not expected to be exceeded due to the school's activities, i.e., the sound levels resulting from voice and music. However, it is conceivable that the use of a sound amplification system for the playback of recorded music could cause annoyance and disturbance for nearby residents on the south side of Pakanu Street, if not properly set up and operated. Loudspeakers of such a system should be aimed toward the north side of the pavilion, away from Pakanu Street and several smaller loudspeakers should be used rather than one large one. This will place the sources of the music closer to the dancers, such that the same sound level can be achieved without attempting to project or "throw" the sound over a longer distance.

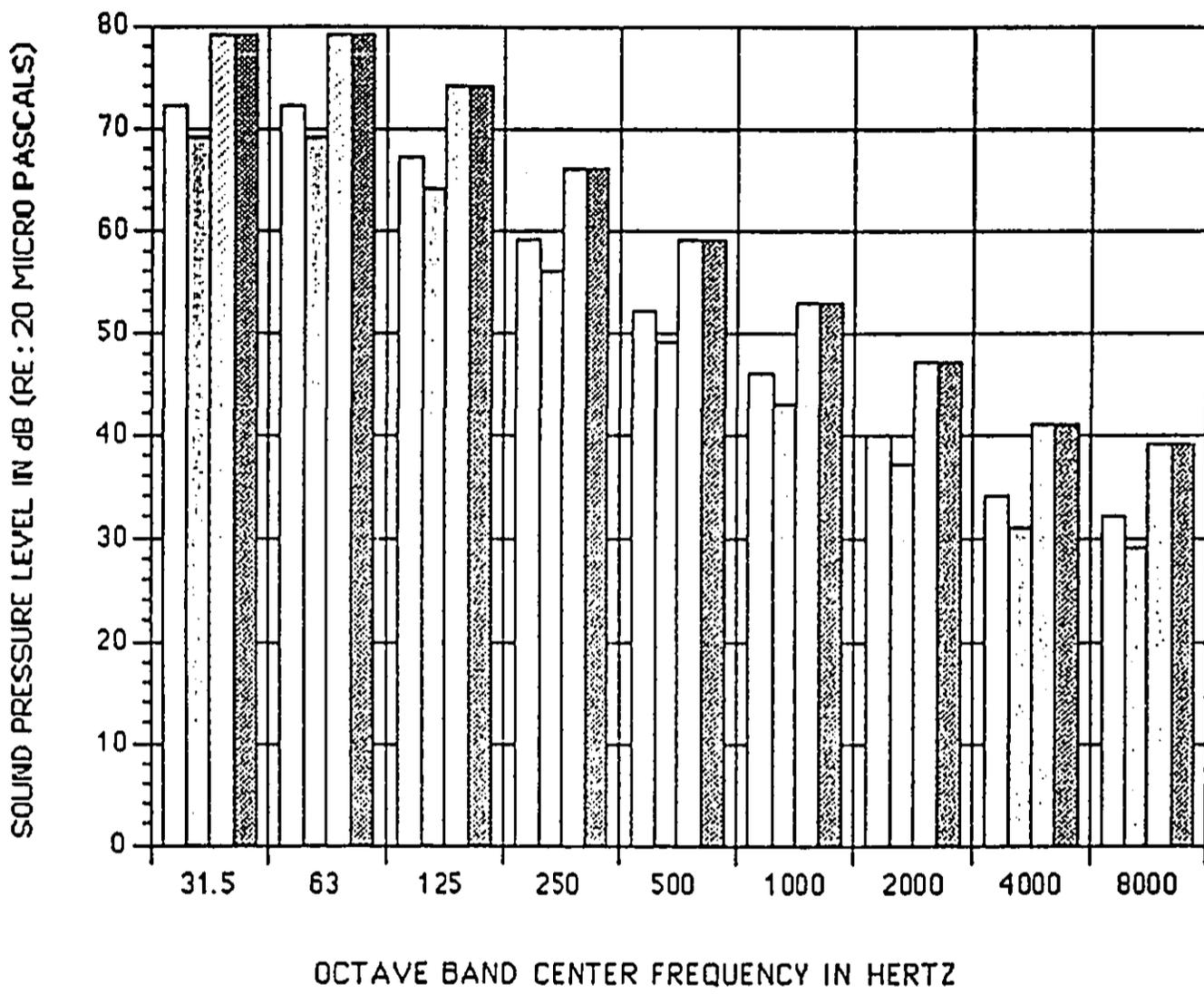
6.0 CONCLUSION

The proposed use of the pavilion building of the Manoa Chinese Cemetery by Ballet Hawaii is not expected to exceed the A-weighted equivalent value of the LUO nor to result in any significant or adverse noise impacts on the nearby residential community.

0000 00 12 1608

REFERENCES:

1. *Community Noise Control*, Chapter 46, Title 11, Department of Health, State of Hawaii, Administrative Rules, September 23, 1996.
2. Section 3.100, *Noise Regulations*, Land Use Ordinance, Department of Land Utilization, City and County of Honolulu, December 1995.
3. *Toward a National Strategy for Noise Control*, U. S. Environmental Protection Agency, April 1977.
4. *Federal Highway Administration procedures for Abatement of Highway Traffic Noise*, U. S. Department of Transportation, Title 23, CFR, Chapter I, Subchapter J, Part 772, 38 FR 15953, June 19, 1973; Revised at 47 FR 29654, July 8, 1982.
5. *Noise Analysis and Abatement Policy*, State of Hawaii, Department of Transportation, Highways Division, June 1997.
6. Facsimile to Colette Sakoda, Subject: Ballet Hawaii, from Karl Kim, University of Hawaii at Manoa, Department of Urban and Regional Planning, October 29, 1996.
7. *EA for Ballet Hawaii Use of Pavilion at Manoa Chinese Cemetery, Honolulu, Hawaii, Traffic Conditions and Impacts*, Julian Ng, Inc., February 11, 1998.
8. Facsimile to R. M. Towill Corporation, Subject: Ballet Hawaii Dance Studio, from Ronald A. Darby, P.E., RAD Engineering, Ltd., October 24, 1996.



- RESIDENTIAL-DAYTIME
- RESIDENTIAL-NIGHTTIME
- NON-RESIDENTIAL-DAYTIME
- NON-RESIDENTIAL-NIGHTTIME

 D. L. ADAMS ASSOCIATES, LTD.
DARBY & ASSOCIATES
ACOUSTICAL CONSULTANTS

FIGURE 1 - CITY AND COUNTY OF HONOLULU, DEPARTMENT OF LAND UTILIZATION, LAND USE ORDINANCE, MAXIMUM SOUND PRESSURE LEVELS

APPENDIX A

ACOUSTICAL TERMINOLOGY

Sound Pressure Level

Sound or noise consists of minute fluctuations in atmospheric pressure capable of evoking the sense of hearing. It is measured in terms of decibels (dB) using precision instruments known as sound level meters. Noise is defined as "unwanted" sound.

Technically, sound pressure level (SPL) is defined as:

$$\text{SPL} = 20 \log (P/\text{Pref}) \text{ dB}$$

where P is the sound pressure fluctuation (above or below atmospheric pressure) and Pref is the reference pressure, 20 micropascals, which is approximately the lowest sound pressure that can be detected by the human ear. For example, if P is 20 micropascals, then SPL = 0 dB, or if P is 200 micropascals, then SPL = 20 dB. The relation between sound pressure in micropascals and sound pressure level in decibels (dB) is shown in Figure A-1.

The sound pressure level that results from a combination of noise sources is not the arithmetic sum of the individual sound levels, but rather the logarithmic sum. For example, two sound levels of 50 dB produce a combined level of 53 dB, not 100 dB; two sound levels of 40 and 50 dB produce a combined level of 50.4 dB.

Human sensitivity to changes in sound pressure level is highly individualized. Sensitivity to sound depends on frequency content, time of occurrence, duration, and psychological factors such as emotions and expectations. However, in general, a change of 1 or 2 dB in the level of a sound is difficult for most people to detect. A 3 dB change is commonly taken as the smallest perceptible change and a 5 dB change corresponds to a noticeable change in loudness. A 10 dB increase or decrease in sound level corresponds to an approximate doubling or halving of loudness, respectively.

A-Weighted Sound Level

The human ear is more sensitive to sound in the frequency range of 250 Hertz (Hz) and higher, than in frequencies below 250 Hz. Due to this type of frequency response, a frequency weighting system, was developed to emulate the frequency response of the human ear. This system expresses sound levels in units of A-weighted decibels (dBA). A-weighted sound levels de-emphasizes the low frequency portion of the spectrum of a signal. The A-weighted level of a sound is a good measure of the loudness of that sound. Different sounds having the same A-weighted sound level are perceived as being about equally loud. Typical values of the A-weighted sound level of various noise sources are shown in Figure A-1.

Appendix A Acoustical Terminology (Continued)

Statistical Sound Levels

The sound levels of long-term noise producing activities, such as traffic movement, aircraft operations, etc., can vary considerably with time. In order to obtain a single number rating of such a noise source, a statistically-based method of expressing sound or noise levels developed. It is known as the Exceedence Level, L_n . The Exceedence Level, L_n , represents the sound level which is exceeded for $n\%$ of the measurement time period. For example, $L_{10} = 60$ dBA indicates that for the duration at the measurement period, the sound level exceeded 60 dBA 10% of the time. Commonly used Exceedence Levels include L_1 , L_{10} , L_{50} , and L_{90} , which are widely used to assess community and environmental noise. Figure A-2 illustrates the relationship between selected statistical noise levels.

Equivalent Sound Level

The Equivalent Sound Level, L_{eq} , represents a constant level of sound having the same total acoustic energy as that contained in the actual time-varying sound being measured over a specific time period. L_{eq} is commonly used to describe community noise, traffic noise, and hearing damage potential. It has units of dBA and is illustrated in Figure A-2.

Day-Night Equivalent Sound Level

The Day-Night Equivalent Sound Level, L_{dn} , is the Equivalent Sound Level, L_{eq} , measured over a 24-hour period. However, a 10 dB penalty is added to the noise levels recorded between 10 pm and 7 am to account for people's higher sensitivity to noise at night when the background noise level is typically lower. The L_{dn} is a commonly used noise descriptor in assessing land use compatibility, and is widely used by federal and local agencies and standards organizations. Qualitative descriptions, as well as local examples of L_{dn} , are shown in Figure A-3.

0000 00 12 16 12

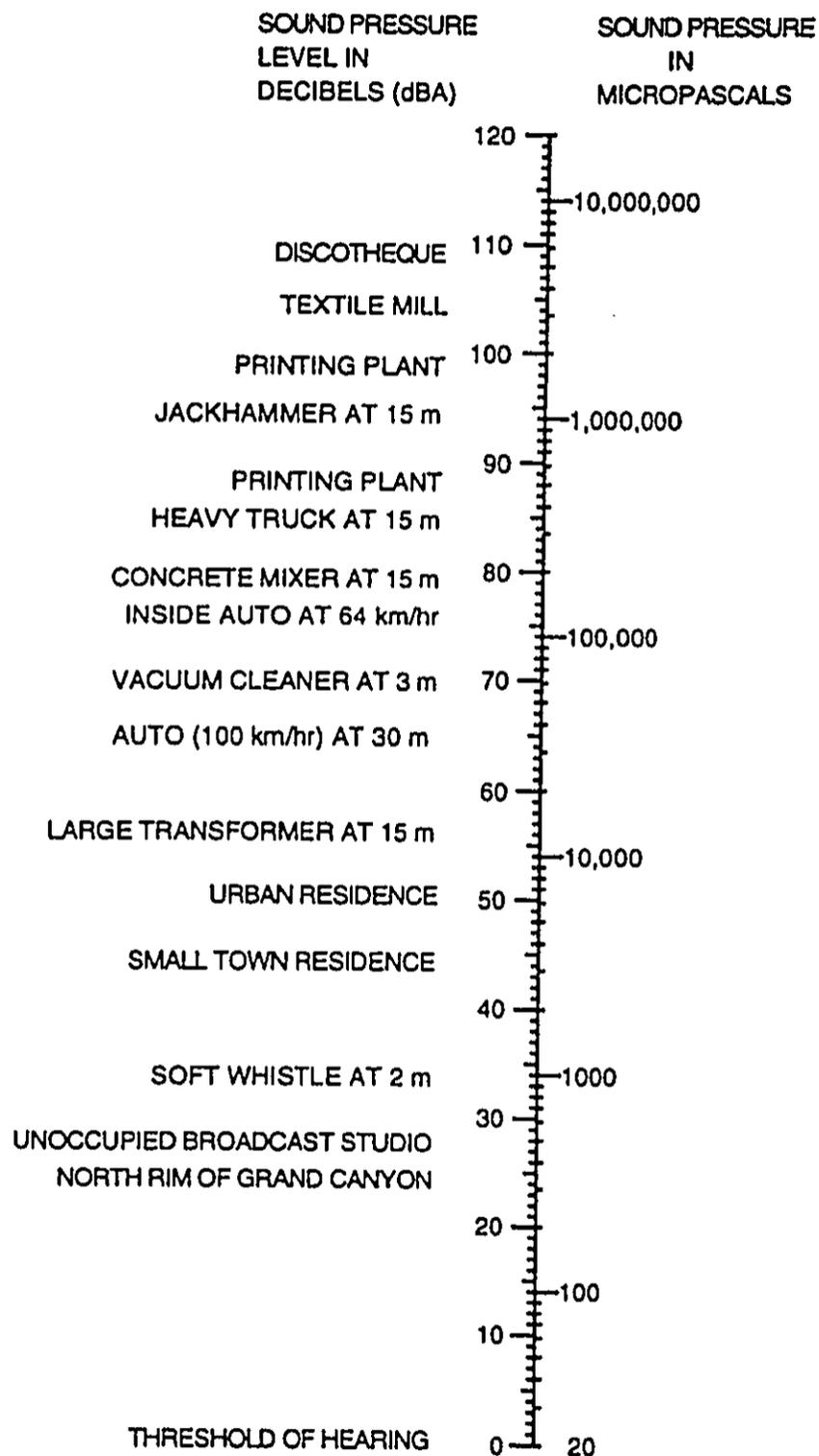
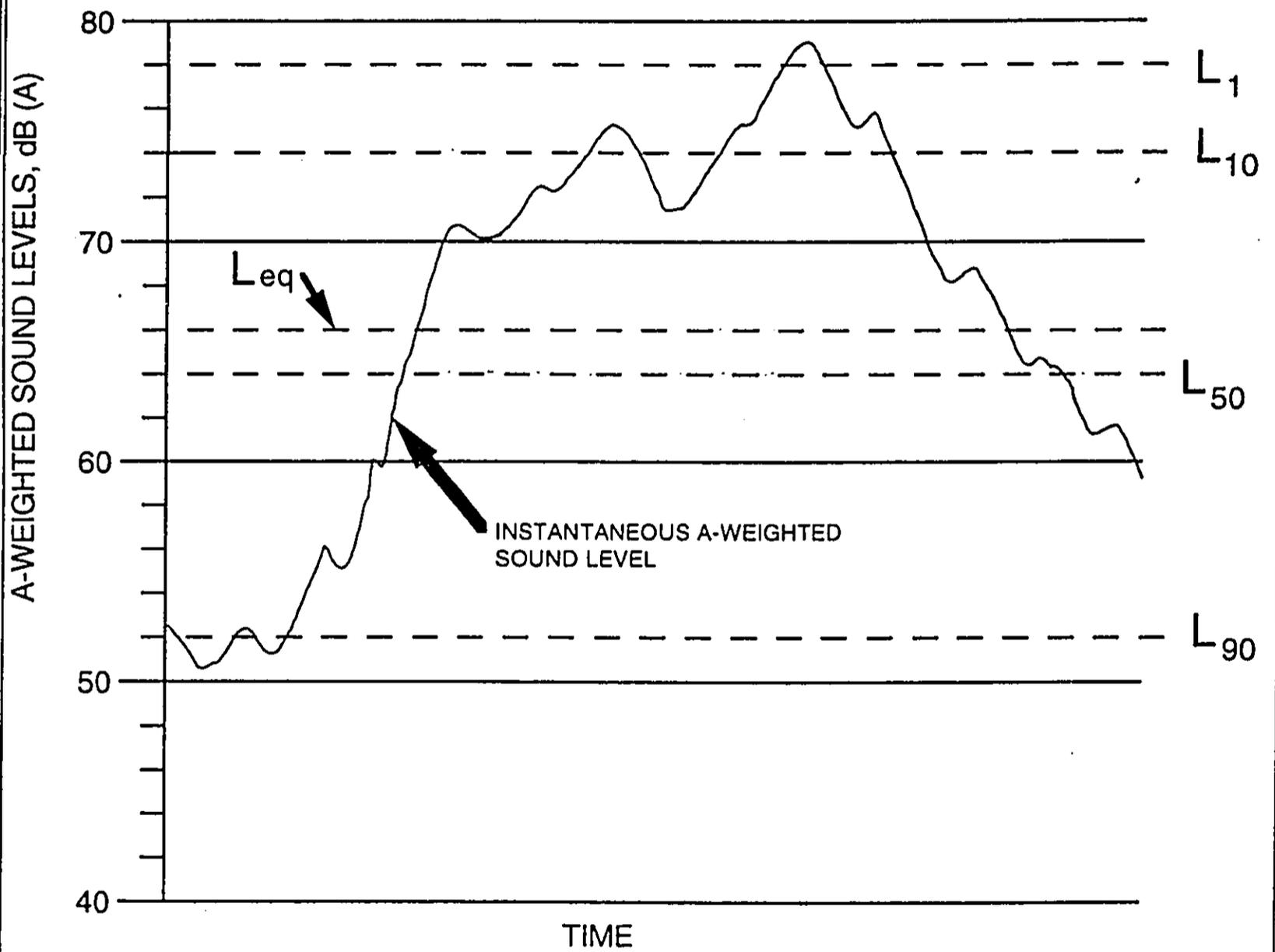


FIGURE A-1

THE RELATION BETWEEN SOUND PRESSURE, P, AND SOUND PRESSURE LEVEL, SPL. ALSO SHOWN ARE TYPICAL VALUES OF A-WEIGHTED SOUND LEVELS OF VARIOUS NOISE SOURCES.

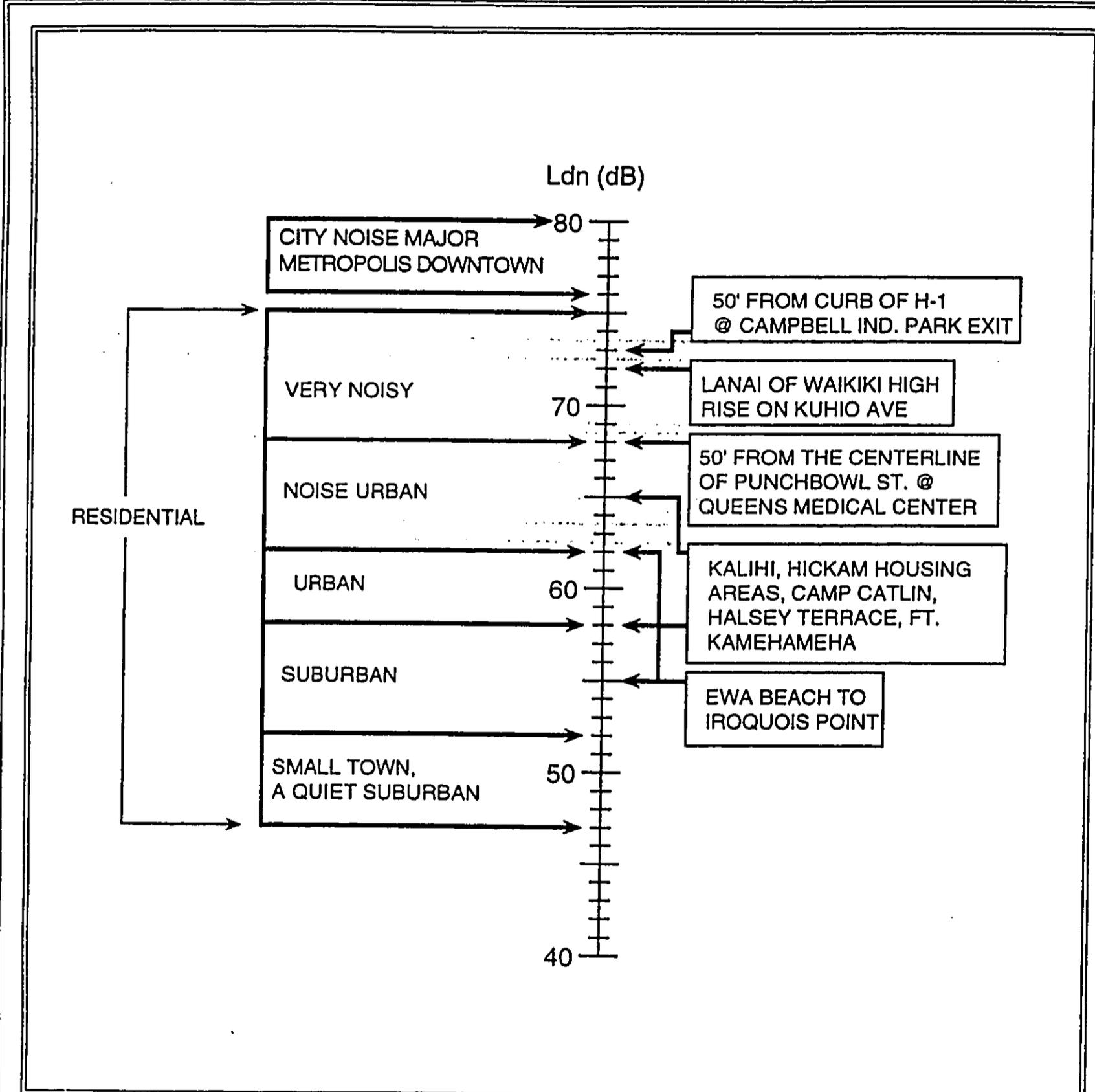
 D. L. ADAMS ASSOCIATES, LTD.
DARBY & ASSOCIATES
ACOUSTICAL CONSULTANTS

0000 00 12 16 13



 D. L. ADAMS ASSOCIATES, LTD.
dba
DARBY & ASSOCIATES
ACOUSTICAL CONSULTANTS

FIGURE A-2
COMPARISON OF AN INSTANTANEOUS
SOUND LEVEL AND THE CORRESPONDING
STATISTICAL SOUND LEVELS



 D. L. ADAMS ASSOCIATES, LTD.
dba
DARBY & ASSOCIATES
ACOUSTICAL CONSULTANTS

FIGURE A-3
QUALITATIVE DESCRIPTION OF THE
DAY-NIGHT EQUIVALENT SOUND LEVELS
(Ldn) AND EXAMPLE Ldn's AT SELECTED
LOCATIONS ON OAHU

0000 00 12 16 15

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

APPENDIX D
COMMENT LETTERS AND RESPONSES

0000 00 12 16 16

CORRECTION

THE PRECEDING DOCUMENT(S) HAS
BEEN REPHOTOGRAPHED TO ASSURE
LEGIBILITY
SEE FRAME(S)
IMMEDIATELY FOLLOWING

0000 00 12 16 17

Manoa Chinese Cemetery CUP-1

Final Environmental Assessment

APPENDIX D
COMMENT LETTERS AND RESPONSES

BENJAMIN J. CAVETANO
GOVERNOR



GARY GILL
DIRECTOR

STATE OF HAWAII
OFFICE OF ENVIRONMENTAL QUALITY CONTROL

335 SOUTH BERTANAKA STREET
SUITE 702
HONOLULU, HAWAII 96813
TELEPHONE (808) 588-4185
FACSIMILE (808) 588-4188

3430 E. MANOA RD.
HONOLULU, HI 96822

會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

PHONE: (808) 988-5543

August 8, 1998

Ms. Jan Mace Sullivan
Director of Land Utilization
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Sullivan:

Subject: Use of the Historic Manoa Chinese Cemetery Pavilion for
Ballet Classes and Rehearsals, Oahu

Thank you for the opportunity to review the subject document. We
have the following comments.

1. Please consult with the Historic Hawaii Foundation and
document the consultation in the Final EA.
2. Please discuss the findings and reasons for supporting the
FONSI determination based on all 12 significant criteria
listed in §11-200-12 of the EIS rules.

Should you have any questions, please call Leslie Segundo at 586-
4185.

Sincerely,

Gary Gill
Director

c: Lin Yee Chung Association
KRP Information Services

October 15, 1998

Mr. Gary Gill, Director
Office of Environmental Quality Control
235 South Beretania Street, Suite 702
Honolulu, Hawaii 96813

Dear Mr. Gill:

Subject: Draft Environmental Assessment (EA) for a Conditional Use Permit,
Type 1 (CUP1) For Use of a Historic Site (File No. 98/CUP1-36)
Lin Yee Chung Association, 3225 Pakanu Street
Tax Map Key 2-9-043:001

We are in receipt of your letter to Ms. Jan Sullivan regarding the subject project.
The following has been prepared in response to your comments and
recommendations.

1. A letter from the administrator of the State Historic Preservation Division
(SHPD), Department of Land and Natural Resources dated August 3, 1998
indicates that SHPD supports the use of the pavilion as a dance school as the
proposed use would be a means by which it can preserve the historical and
cultural significance of the cemetery. The letter will be referenced and a copy
of the letter will be included in the Final Environmental Assessment.
2. The two missing significance criteria and the findings and reasons for
supporting the FONSI declaration will be included in the Final
Environmental Assessment.

We appreciate your review and comments. Please do not hesitate to call us should
you or your staff have further questions.

Sincerely yours

Winfred K. W. Lum
Yin Lee Chung Association

0000 00 12 15 18

0000 00 12 15 19

MICHAEL D. WILSON, ENVIRONMENTAL
BOARD OF LAND AND NATURAL RESOURCES
DUTY
DRAFT CONGRATULATORY



STATE OF HAWAII
DEPARTMENT OF LAND AND NATURAL RESOURCES
STATE HISTORIC PRESERVATION DIVISION
33 SOUTH KING STREET, 8TH FLOOR
HONOLULU, HAWAII 96813

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII

'98 AUG 7 PM 3 22
DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

LAWRENCE MIKE
DIRECTOR OF -44-110

IN REPLY, PLEASE REFER TO

98-141/epo



STATE OF HAWAII
DEPARTMENT OF HEALTH
P.O. BOX 3378
HONOLULU, HAWAII 96801
July 29, 1998

98 JUL 30 PM 1:27

DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

BENJAMIN J. CAYETANO
GOVERNOR OF HAWAII

Ms. Jan Naoe Sullivan, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

Dear Ms. Sullivan:

Subject: Draft Environmental Assessment
Dance Classes at Manoa Chinese Cemetery Pavilion
3225 Pakanu Street
Manoa, Oahu
TMK: 2-9-43: 1

Thank you for allowing us to review and comment on the subject document.
We do not have any noise concerns, or other concerns, regarding this
proposal.

Sincerely,

Bruce S. Anderson
BRUCE S. ANDERSON, Ph.D.
Deputy Director for
Environmental Health

Ms. Jan Naoe Sullivan
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Ms. Sullivan:

SUBJECT: Environmental Assessment
Conditional Use Permit, Type 1 for
Use of Historic Structures
Manoa Chinese Cemetery
TMK: 2-9-043:001, Manoa, Honolulu, Oahu

Thank you for transmitting the Draft Environmental Assessment for Manoa Chinese
Cemetery. The meeting held which Ballet Hawaii intends to utilize contributes to the
historic significance of the Chinese Cemetery as it allows the continuance of the traditional
cultural practice of the Ching Ming celebration. We support the use of the pavilion as a
dance school because Ballet Hawaii would provide the Lin Yee Chung Association, the
owners of the cemetery, a means by which it can preserve the historical and cultural
significance of the cemetery. We concur with the issuance of a Finding of No Significant
Impact for this project.

Thank you for the opportunity to comment. Should you have further questions, please
call Tonia Moy at 587-0005.

Aloha,
Don Hibbard
DON HIBBARD, Administrator
State Historic Preservation Division

TMije

LOG NO: 22014
DOC NO: 9808tm02
Architecture

ADULT CARE DEVELOPMENT
PROGRAM
AQUATIC RESOURCES
CONSERVATION AND
RECREATION
ENVIRONMENTAL AFFAIRS
CONSERVATION AND
RESOURCES DIVISION
FORESTRY AND WILDLIFE
HISTORIC PRESERVATION
DIVISION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT



CITY COUNCIL
 CITY AND COUNTY OF HONOLULU
 HONOLULU, HAWAII 96813-3065 / TELEPHONE 547-7000

ANDY MIRIKITANI
 COUNCILMEMBER
 (808) 547-7005

August 12, 1998

Ms. Jacqueline Parnell
 KRP Information Services
 1314 S. King Street, Suite 951
 Honolulu, HI 96814

RE: Residents' Concerns Regarding Potential Commercial Activities at Manoa
 Chinese Cemetery - 3225 Pakanu Street, Manoa (TMK 2-9-43: 1)

Dear Ms. Parnell:

Enclosed please find copies of correspondence which I received from long time residents of the area surrounding the Manoa Chinese Cemetery relating to the Conditional Use Permit Application for use of the pavilion on the cemetery property as a dance school.

This is to request that you fully address the concerns expressed by these long time residents in your Environmental Assessment for use of the pavilion. Additionally, a resident has contacted my office requesting clarification of the pavilion's status as an historic structure. The resident maintains that while the Manoa Chinese Cemetery property is an historic site, the pavilion located on the property does not meet the criteria required to qualify as an historic structure.

Thank you for your cooperation and assistance with this matter.

Very truly yours,

 ANDY MIRIKITANI
 Councilmember, District V

Encl. Department of Planning and Permitting
 Office of Environmental Quality Control

AKM:sl
 dpp/bh/dea



會義聯那萬
 Lin Yee Chung Association
 (MANOA CHINESE CEMETERY)
 ELEMOSYNARY

3430 E. MANOA RD.
 HONOLULU, HI 96822

PHONE: (808) 988-5543

October 15, 1998

Honorable Andy Mirikitani
 Councilmember, District V
 City Council
 City & County of Honolulu
 Honolulu, HI 96813

Re: Draft Environmental Assessment (EA) for a Conditional Use Permit, Type 1,
 for Use of a Historic Site (File No. 98/CUP-36)
 Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

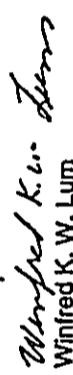
Dear Council member Mirikitani:

This is in response to your letter of August 12, 1998 (addressed to Ms. Jacqueline Parnell) with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction. A copy of the response to the letter you enclosed from Mr. Jesse Ikel is attached.

We recognize the concerns expressed by Mr. Ikel and our other long term neighbors and are doing our best to address them.

As to the specific point that you raised about the status of the pavilion as part of the historic cemetery, please see the letter from the State Historic Preservation Division, also attached.

Sincerely yours,


 Winfred K. W. Lum
 Lin Yee Chung Association

0000 00 12 1620

0000 00 12 1998

8/13/98

DEPARTMENT OF PLANNING AND PERMITTING

CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
PHONE: (808) 525-4414 • FAX: (808) 527-6743



JEREMY HARRIS
MAYOR

JAN MAGE SULLIVAN
DIRECTOR
LORETTA A. C. CHEE
DEPUTY DIRECTOR

98-04534 (JK)
98/CUPI-36

August 12, 1998

Ms. Donna Leong
Page 2
August 12, 1998

Ms. Donna Leong
Cades Schutte Fleming & Wright
1000 Bishop Street, 10th Floor
Honolulu, Hawaii 96813

Dear Ms. Leong:

Draft Environmental Assessment (EA) for
a Conditional Use Permit, Type 1 (CUP1)
for Use of a Historic Structure
(File No. 98/CUPI-36)
Lin Yee Chung Association
3225 Pakanu Street
Tax_Map_Key 2-9-043: 001

We have reviewed the Draft EA submitted on June 24, 1998 for a CUP1
and offer the following comments:

General Information

1. The land area of the project site in the project description should be corrected to 10.753 acres instead of 10.573 acres.
2. The Year of the botanical survey conducted by Winona Char & Associates and the traffic assessment conducted by Julian Ng, Inc. should be corrected to 1998 instead of 1988.

Proposed Project

1. Written documentation confirming that the proposed use and any modifications to the structures or grounds have been approved by the State Historic Preservation Officer should be submitted to the Department of Planning and Permitting (DPP).

Xc StartKnox } 8/13/98
Chutttu Sakoda-
Jackie Pannell

2. The application contains no information as to how the applicant plans to maintain, preserve or restore this historic property, including what portion of the revenues collected from the dance school will be used for such costs. This information should be included in the final EA document.
3. Discuss the community benefits offered by the applicant/facility.
4. Address the project with respect to the intent of the P-2 district?
5. Describe how the proposed dance school will affect the essentially residential character of the neighborhood.
6. Describe measures proposed to mitigate potential impacts to the surrounding neighborhood (i.e. noise, traffic, safety hazards, vehicle headlight glare, parking).
7. A schedule of activities identifying the type of instruction, duration of the class, location and number of persons (students and staff) on the site should be provided.

Traffic Assessment

1. Pakanu Street Traffic Volumes (Table 1) provides traffic volumes during "peak hours." However, peak hours are not defined.
2. Is the capacity analysis of the unsignalized intersection (Table 4) measuring the Levels of Service (LOS) during peak hour conditions?

Drawings/Plans

1. A landscape plan showing all existing and proposed landscaping should be provided. The landscape plan must identify all plant material by typical name, size, location, and quantities.
The landscape plan should also incorporate the recommendation of Char & Associates that "a dense planting of shrubs be put in between the Italian cypress trees along Pakanu Street" to "provide mitigation for noise and also screen the ballet activities from the street level."

Ms. Donna Leong
Page 3
August 12, 1998

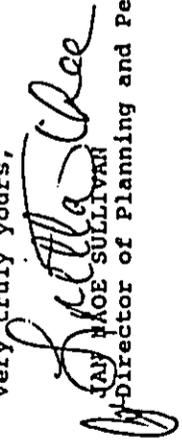
會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MAHOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

- 2. The floor plan should identify all rooms and activity areas.
 - 3. Provide a parking plan that meets all Land Use Ordinance (LUO) parking and loading requirements, including requirements for parking lot landscaping, parking/loading space and back-up aisle dimensions, driveway widths, and all-weather surface.
- We have enclosed a copy of the public agency and community comments received by the DPP during the 30-day public comment period. Should you have any questions please contact Lynne Kauer of our staff at 527-6278.

Very truly yours,


 JAY NAOE SULLIVAN
 Director of Planning and Permitting

JNS:lg
Enclosure
9:24:18-0831.11

October 15, 1998

Ms. Jan Naoe Sullivan, Director
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Ms. Sullivan:

Subject: Draft Environmental Assessment (EA) for a Conditional Use Permit, Type 1 (CUP1) for Use of a Historic Site (File No. 98/CUP1-36)
Lin Yee Chung Association
3225 Pakanu Street
Tax Map Key 2-9-043:001

We are in receipt of your letter to Ms. Donna Leong regarding the subject project. The following has been prepared in response to your comments and recommendations.

General Information

The description of the size of the project site and the year of the botanical survey conducted by Winona Char & Associates will be corrected, and the changes will be included in the Final Environmental Assessment.

Proposed Project

- 1. A letter from the administrator of the State Historic Preservation Division (SHPD), Department of Land and Natural Resources dated August 3, 1998 indicates that SHPD supports the use of the pavilion as a dance school as the proposed use would be a means by which it can preserve the historical and cultural significance of the cemetery. The letter will be referenced and a copy of the letter will be included in the Final Environmental Assessment.
- 2. As stated in Section 1.4 Need for Current Request, page 2 of the Draft Environmental Assessment, funds received through lease rent from Ballet Hawaii will help the Lin Yee Chung Association maintain the landscaping and to make needed repairs to the termite-ridden building. The ballet school proposes to utilize

0000 00 12 1622

the existing Pavilion building in its "as is" condition, and proposes no alteration to the grounds of the cemetery. By so doing, the proposed use by the ballet school will help preserve and maintain the existing conditions of this historic property. This information will be included in the final EA document.

3. Community benefits offered by the applicant include the following:

a. Through payment of lease rent to the Lin Yee Chung Association, Ballet Hawaii will be helping to facilitate the upkeep and continual restoration of the grounds of the cemetery and thereby help prevent the site from falling into disrepair. Without rental income from this proposed use, the Association's ability to pay for lawn trimming and repair of the termite-ridden Pavilion building will be impaired, thus resulting in a cemetery overgrown with weeds and littered with trash. This would then result in a site that attracts loitering and criminal activities. However, by renting the Pavilion to the ballet school, the proposed low-impact usage as well as rental income gained will help to ensure the Association's ability to maintain the cemetery's esthetically pleasing, well-manicured, open-space character and value to the community.

b. The ballet school's return to the Manoa Chinese Cemetery location will offer families who live or work in Manoa, a viable, healthy, wholesome, educational and accessible after-school activity choice besides softball, soccer, and other outdoor activities. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. The lives of Honolulu's children and grandchildren are enriched by these activities, and communities by their presence.

Discussion of these community benefits will be included in the final EA document.

4. As earlier stated, the project proposes no physical or structural alteration to the existing Pavilion structure or the grounds of the Cemetery which would otherwise detract from its open-space, natural character as typified by the intent of the P-2 district. The ballet school activities will be able to occur within the given Cemetery infrastructure, and therefore support and facilitate the purpose and intent of the P-2 district.

5. The dance school's proposed use of the Pavilion in the Cemetery will blend in with the essentially residential character of the neighborhood, particularly since the activity will not necessitate any change to the existing physical or structural condition of the historic property. Two probable changes that may be noticed by residents and passersby will be:

a) slight increase in parked cars (average number on weekday afternoons is 5; Saturdays is 9) in the internal driveway fronting the Pavilion).

b) During the late fall and winter session, the inside lights of the Pavilion will probably be turned on earlier due to shorter daylight hours. However, this will occur on the Cemetery property as will within all of the other surrounding properties.

Parents and students will be required to adhere to the dance school's self-instituted traffic and parking plan to avoid causing noise or traffic impacts in the neighborhood. In fact, the minor increase in human activity in and along the sidewalk fronting the Cemetery, will probably result in a positive impact by inadvertently instilling a greater sense of safety and security for the neighbors of this expansive 10.75 acre property.

Thus, the proposed dance school is not foreseen as a detraction from the residential character of the neighborhood. Instead it is intended to blend in with its low-impact, non-disruptive activity.

These issues will be included in the final EA document.

6. Specific measures that will be taken to avoid potential impacts to the surrounding neighborhood are:

a) Noise. The sliding glass doors located on the Pakanu Street (makai) side of the Pavilion will be kept closed during dance classes. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

b) Traffic. As indicated earlier, parents and students will be required to adhere to the ballet school's self-instituted traffic and parking plan to avoid causing traffic impacts in the neighborhood. A joint parking arrangement between Lin Yee Chung Association and Ballet Hawaii will be enforced. Vehicular parking generated by the ballet school can and will be accommodated within the Cemetery. If headlight glare from within the driveway leads to impacts on neighboring properties, then vegetative screening to help block headlights from the shining from the driveway will be considered.

7. A schedule of activities identifying the type of instruction, duration of the class, location and number of persons (students and staff) on the site will be included in the final EA document.

0000 00 12 1624

PLANNING DEPARTMENT
CITY AND COUNTY OF HONOLULU

650 SOUTH KING STREET, 8TH FLOOR • HONOLULU, HAWAII 96813-3017
PHONE: (808) 923-4333 • FAX: (808) 923-4950



JEREMY HARRIS
MAYOR

PATRICK T. ONISHI
CHIEF PLANNING OFFICER
DONA L. MANAHE
DEPUTY CHIEF PLANNING OFFICER

RR 7/98-1351

August 6, 1998

90 AUG 11 AM 8:19

DEPT OF PLANNING
INFORMATION
CITY & COUNTY OF HONOLULU

TO: JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: PATRICK T. ONISHI
CHIEF PLANNING OFFICER

SUBJECT: ENVIRONMENTAL ASSESSMENT (EA), CHAPTER 343, HRS
CONDITIONAL USE PERMIT, TYPE 1, HISTORIC STRUCTURES
MANOA CHINESE CEMETERY, 3225 PAKANU STREET
TAX MAP KEY 2-9-043: 001 (98/CUPI-36)

Traffic Assessment

1. The peak hour traffic volume shown in Table 1 of the traffic Assessment Report are based on count data and rounded to the nearest five vehicles per hour. The AM Peak Hour occurred between 7:15 and 8:15 A.M. and the PM Peak Hour occurred between 4:45 and 5:45 P.M. the Saturday peak hour volumes were recorded between 9:30 and 10:30 AM for koloheadbound traffic and between 10:00 and 11:00 AM for eastbound traffic.

2. The results of the capacity analysis shown in Table 4 are for the peak 15-minute volumes, based on the volumes shown in Figure 2. As noted in the text directly under the table, a high estimate of project traffic was made and "[u]nder more realistic conditions where the project traffic should be less than the worst-case volumes indicated in Figure 2, delays would be less than shown.

Drawings/Plans

1. The site plan will be revised to include a landscaping detail. Plant material by typical name and location will be included. The revised site plan will be included in the final EA document. To avoid potential noise impacts, the Cemetery Association is taking the botanist's recommended increased landscape screening on the Pakanu Street side of the Pavilion under advisement as one of several preventive measures.

2. The floor plan will be revised to identify the rooms and activity areas. The revised floor plan will be included in the final EA document.

3. A joint parking agreement between Lin Yee Chung Association and Ballet Hawaii will be included in the final EA document. Ballet classes will not be held at the Cemetery during the annual Ching Ming celebration and observance period (every Saturday in April). Otherwise, parking and drop off/pick up requirements of the dance school can be accommodated within the Cemetery along the internal driveway system as illustrated on the revised site plan. The revised site plan will be included in the final EA document.

We appreciate your review and comments. Please do not hesitate to call us should you or your staff have further questions.

Sincerely yours,

Winfred K. W. Lum

Winfred K. W. Lum
Yin Lee Chung Association

We have reviewed the above EA with regard to the proposed project's impacts on the City and County of Honolulu's General Plan and the Development Plan for the Primary Urban Center and its special provisions and have the following comments:

1. The applicant proposes to operate a dance school on the above site. The avowed purpose is to convert an existing building to commercial use for generating income. The proposed use is neither related to religious nor cemetery usage of the site.
2. The proposed use is not likely to generate any adverse physical impact on the site, but may generate additional traffic within the residential area. It may also generate noise in the area that may adversely affect surrounding homes, especially since the dance hall is expected to operate into the evening hours at various times of the year.
3. The applicant is not offering any mitigation measures with regard to the above potential traffic impacts. Nor has the applicant demonstrated sufficient evidence that noise will be satisfactorily handled at this site. We noted that noise complaints were evident at a previous site occupied by the dance hall.
4. The proposed use does raise the question as to its suitability in promoting the General Plan Objective of protecting Oahu's cultural and historic resources (GP: Culture and Recreation, Objective B.)

Jan Naoe Sullivan
Department of Planning and Permitting
August 6, 1998
Page 2

會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEEMOSYNARY

3430 E. MAHOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

While we are sympathetic to the applicant's purpose for submitting this proposal, there appears to be sufficient concerns with regard to neighborhood impacts to warrant further, definitive study of mitigation measures regarding traffic and noise before approval is granted.

We recommend that the final EA address these issues and that a full EIS be undertaken in this regard if final EA information does not adequately address these concerns.

Should you have any questions in this regard, please contact Robert Reed of our staff at 523-4402.

PTO:ft

October 15, 1998

Mr. Patrick Onishi, Chief Planning Officer
Department of Planning
City and County of Honolulu
650 South King Street, 8th Floor
Honolulu, Hawaii 96813

Dear Mr. Onishi:

Subject: Draft Environmental Assessment (EA) for a Conditional Use Permit,
Type 1 (CUP1) for Use of a Historic Site (File No. 98/CUP1-36)
Lin Yee Chung Association
3225 Pakanu Street
Tax_Map_Key 2-9-043:001

We are in receipt of your memorandum dated 6 August, 1998, to Jan Naoe Sullivan, Director of the Department of Planning and Permitting, regarding the subject project. The following has been prepared in response to your comments and recommendations.

Compatibility of Use

This application is for a Conditional Use Permit which has standards that are different from those for a variance. The use does not have to relate to religious or cemetery usage. Please see the comments on suitability below.

Traffic

Parents and students will be required to adhere to the ballet school's self-instituted traffic and parking plan to avoid causing traffic impacts in the neighborhood. A joint parking arrangement between Lin Yee Chung Association and Ballet Hawaii will be enforced. Vehicular parking generated by the ballet school can and will be

0000 00 12 1625

accommodated within the Cemetery. If headlight glare from within the driveway loads to impacts on neighboring properties, then vegetative screening to help block headlights from the shining from the driveway will be considered.

Noise

The sliding glass doors located on the Pakanu Street (makai) side of the Pavilion will be kept closed during dance classes. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

Suitability

A letter from the administrator of the State Historic Preservation Division (SHPD), Department of Land and Natural Resources dated August 3, 1998 indicates that SHPD supports the use of the pavilion as a dance school as the proposed use would be a means by which it can preserve the historical and cultural significance of the cemetery. The Division does not find the proposed use to be incompatible. Further, it should be noted that virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences.

The issues that you have identified will be addressed fully in the Final Environmental Assessment.

We appreciate your review and comments. Please do not hesitate to call us should you or your staff have further questions.

Sincerely yours,

Winifred K.W. Lum
Winifred K. W. Lum
Lin Yee Chung Association

To: Land Use Approvals Branch (Joan Takano)
CC:
From: Urban Design Branch *[Signature]*
Date: July 9, 1998
Re: Request for comments - Environmental Assessment, Chapter 343, HRS, Conditional Use Permit, Type I for Use of Historic Structures
Puka Chinese Cemetery, 3735 Pakanu Street, Hukou

memo

Our comments are as follows:

The project has no park dedication or street tree requirements for our department.

from the desk of...
Lester Lal
Planner
CAC Dept. of Planning and Permitting
650 So. King Street, 7th floor
Hon., HI 96813
(808) 531-4732
fax: (808) 537-4743

0000 00 12 1627

DEPARTMENT OF PLANNING AND PERMITTING
CITY AND COUNTY OF HONOLULU

850 SOUTH KING STREET, 7TH FLOOR • HONOLULU, HAWAII 96813
Phone: (808) 523-4414 • Fax: (808) 527-6743



JAN HAGE SULLIVAN
DIRECTOR

LORETTA K.C. CHEE
DEPUTY DIRECTOR

MANCCDEA.003 (MH)

July 28, 1998

MEMORANDUM

TO: LAND USE APPROVALS BRANCH
ZONING DIVISION

ATTN: JOAN TAKANO

FROM: TRAFFIC REVIEW BRANCH
SITE DEVELOPMENT DIVISION

SUBJECT: MAHOA CHINESE CEMETERY
ENVIRONMENTAL ASSESSMENT - DRAFT
THK: 2-9-43: 1

This is in response to your transmittal dated July 6, 1998, requesting our comments on the draft environmental assessment for the subject project.

Based on our review, we have the following comments:

1. All loading/unloading activities and vehicular maneuvering should occur on-site.
2. Off-street parking requirements should be in accordance with the Land Use Ordinance.
3. The access driveway to the pavillion should have a minimum pavement width of 20 feet. This is to provide a comfortable 2-way traffic movement at the entry point.

Should you have any questions, please contact Wayne Nakamoto of my staff, at local 4190.

MELVIN HIRAYAMA

會義聯那萬
Lin Yee Chung Association
(MAHOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MAHOA RD.
HONOLULU, HI 96822

PHONE: (808) 948-5543

October 15, 1998

Mr. Melvin Hirayama
Traffic Division
Department of Planning and Permitting
City and County of Honolulu
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

Dear Mr. Hirayama:

Subject: Draft Environmental Assessment (EA) for a Conditional Use Permit, Type 1 (CUP1) for Use of a Historic Site (File No. 98/CUP1-36)
Lin Yee Chung Association
3225 Pakanu Street
Tax Map Key 2-9-043:001

We are in receipt of your memorandum dated July 28, 1998, to Joan Takano of the Zoning Division regarding the subject project. Our traffic consultant, Mr. Julian Ng, agrees with all of your comments and recommendations.

1. All loading and unloading activities and vehicular maneuvering will occur on-site.
2. Off-street parking requirements will be in compliance with the Land Use Ordinance.
3. The access driveway to the pavillion meets requirements for safe two-way traffic at its entry point.

The issues that you have identified will be addressed fully in the Final Environmental Assessment.

Sincerely yours,

Winfred K. W. Lum
Yin Lee Chung Association

0000 00 12 1628

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU
401 SOUTH BERETANIA STREET
HONOLULU, HAWAII 96813 - AREA COOL (808) 52



JEREMY HARRIS
MAYOR

OUR REFERENCE CS-DL July 23, 1998

TO: JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: LEE D. DONOHUE, CHIEF OF POLICE
HONOLULU POLICE DEPARTMENT

SUBJECT: REQUEST FOR COMMENTS
ENVIRONMENTAL ASSESSMENT, CHAPTER 343, HRS
CONDITIONAL USE PERMIT, TYPE 1 FOR USE OF
HISTORIC STRUCTURES
MANOA CHINESE CEMETERY
3225 PAKANU STREET - MANOA
TAX MAP KEY 2-2-043: 001

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

This project should have negligible impact on the Honolululu Police Department.

Should you have any questions, please call me at 529-3362.
Major Henry Robinson of District 7 at 529-3362.

LEE D. DONOHUE
Chief of Police
BY *James Femia*
JAMES FEMIA
Assistant Chief
Administrative Services

cc: Major Henry Robinson
District 7

FIRE DEPARTMENT
CITY AND COUNTY OF HONOLULU
3378 KOAPAA STREET, SUITE 4122
HONOLULU, HAWAII 96819-1829



JEREMY HARRIS
MAYOR

July 28, 1998

TO: JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: ATTILIO K. LEONARDI, FIRE CHIEF

SUBJECT: REQUEST FOR COMMENTS
ENVIRONMENTAL ASSESSMENT, CHAPTER 343, HRS
CONDITIONAL USE PERMIT, TYPE 1
FOR USE OF HISTORIC STRUCTURES
MANOA CHINESE CEMETERY
3725 PAKANU STREET - MANOA
TMK: 2-9-043: 001
HFD INTERNAL NO. OL 98-248

98 JUL 29 PM 1:47
DEPT OF PLANNING AND PERMITTING
CITY & COUNTY OF HONOLULU

We received your memorandum of July 6, 1998, regarding your request for review and comments on the Conditional Use Permit, Type 1 for the subject property. We will not require any additional on-site requirements, except that the structure will need to comply with the building and fire codes for an assembly occupancy and fire apparatus accessibility.

Should you need additional information, please contact Battalion Chief Charles Wassman of our Fire Prevention Bureau at 831-7778.

Attilio K. Leonard
ATTILIO K. LEONARDI
Fire Chief

AKL/CV:sh

0000 00 12 1629

DEPARTMENT OF DESIGN AND CONSTRUCTION
CITY AND COUNTY OF HONOLULU
650 SOUTH KING STREET, 2ND FLOOR
HONOLULU, HAWAII 96813
PHONE: (808) 523-4564 • FAX: (808) 523-4567



RANDALL K. FUJIKI, AIA
DIRECTOR
ROLAND D. LIBBY, JR., AIA
DEPUTY DIRECTOR
DC-35

JEREMY HARRIS
MAYOR



JAN NAOE SULLIVAN
DIRECTOR
LORETTA K.C. CHEE
DEPUTY DIRECTOR

July 21, 1998

July 22, 1998

In reply refer to:
WVM 98-8

98 JUL 27 PM 3:56
DEPT OF PLANNING
& PERMITTING
CITY & COUNTY OF HONOLULU

MEMO TO: JAN NAOE SULLIVAN, DIRECTOR
DEPARTMENT OF PLANNING AND PERMITTING

FROM: RANDALL K. FUJIKI, DIRECTOR
SUBJECT: REQUEST FOR COMMENTS
ENVIRONMENTAL ASSESSMENT, CHAPTER, 343, HRS
CONDITIONAL USE PERMIT, TYPE I
FOR USE OF HISTORIC STRUCTURES
MANOA CHINESE CEMETERY
3225 PAKANU STREET - MANOA
TAX MAP KEY 2-2-043:001

This is in response to your request of July 8, 1998 to review and comment on the subject
DEA.

We have no comments to offer but thank you for the opportunity to review the document.

Should there be any questions, please have your staff contact Douglas Collinson at ext.
6375.

Randall K. Fujiki
For RANDALL K. FUJIKI
Director

RKF:jo

MEMORANDUM

TO: MS. EILEEN MARK
LAND USE APPROVALS BRANCH
FROM: *Dennis Nishimura*
DENNIS NISHIMURA
WASTEWATER BRANCH
SUBJECT: REQUEST FOR COMMENTS
ENVIRONMENTAL ASSESSMENT, CHAPTER 343, HRS
CONDITIONAL USE PERMIT, TYPE I, FOR USE OF HISTORIC
STRUCTURES (FILE NO. 98/CUP1-36)
MANOA CHINESE CEMETERY
3225 PAKANU STREET - MANOA
TMK: 2-2-043: 001

The municipal wastewater system is available and adequate to accommodate the proposed use. The applicant plans to lease the Manoa Chinese Cemetery meeting hall to Ballet Hawaii for ballet classes and rehearsals. Classes will range in size from less than ten to twenty-some students. The proposed usage of the hall will be significantly less than its primary use during Ching Ming, and will not occur simultaneously.

This statement shall not be construed as confirmation of sewage capacity reservation. Sewage capacity reservation is contingent on submittal and approval of a "Sewer Connection Application" form.

If you have any questions, please contact Mr. Scott Gushi of the Wastewater Branch at 523-4886.

0000 00 12 16 30

Ms. Jan Naoe Sullivan
August 2, 1998
Page 2

RECEIVED

AUG 5 2 35 PM '98

August 2, 1998

Ms. Jan Naoe Sullivan
Director, Department of Land Utilization
City & County of Honolulu
650 South King Street
Honolulu, Hawaii 96813

The additional traffic generated will be a problem. The traffic lights at Oahu Avenue and East Manoa Road were retimed to handle traffic problems in and out of Manoa Valley. During Ching Ming, traffic and parking are a problem in the neighborhood. When Chai Chabad of Hawaii has special events, traffic and parking are a problem. If Ballet Hawaii is allowed a conditional use permit, traffic and parking will be a problem.

Re: Lin Yee Chung Association - Ballet Hawaii
File No. 98/CUP1-036

If one looks at the applicant's plan for additional overflow parking on the grassed area, it does not meet the General Development Standards of 3.70-5 and 3.80. If the grassed area is repeatedly driven upon or wet, it will eventually turn into a dirt area. Forty-four cars parked on the grassed area next to the Pavilion will destroy the view and the landscape of this designated historic site. The Lin Yee Chung Memorial Hall located at 3430 East Manoa Road (triangular site) at one time did have ample off-street paved parking on that site to handle large gatherings but has since been converted to a grassy playground area. I could not locate any records at the City to indicate any approval of eliminating the parking lot for cemetery patrols. The width of the proposed 12 parking spaces in the driveway is 16 feet curb to curb.

Dear Ms. Sullivan:

I am Jesse Ikei and reside at 3374 East Manoa Road. I am offering comments on an application from Lin Yee Chung Association for a conditional use permit for a dance school in the Manoa Chinese Cemetery.

The applicant proposes to lease the Pavilion to Ballet Hawaii for use as a business dance school for creative dance and ballet lessons.

The purpose of a conditional use permit is to specify minimum development standards. The Pavilion does not meet the minimum standards. All dance schools shall be located in enclosed sound-attenuated structures.

The applicant states that a noise assessment was conducted by Darby & Associates in February, 1998. The actual noise survey was done on October 11, 1996 by a Manoa Neighborhood Board member and some students. The noise assessment should be considered not valid.

The applicant states that it is conceivable that the use of a sound amplification system for the playback of recorded music could cause annoyance and disturbance for nearby residents. The applicant further states that the use of sound amplification equipment for certain rehearsals or classes requiring the playback of recorded music could potentially impact the nearby residential area.

When Ballet Hawaii was operating in the Pavilion previously without a variance or permit, it did cause annoyance and disturbance for nearby residents and negatively impacted the nearby residents.

The applicant has no plans on file to sound-attenuate the Pavilion.

On December 8, 1995, Lin Yee Chung Association with Ballet Hawaii was denied a variance to allow a dance school at 3430 East Manoa Road. (95/Var-41). On March 20, 1997, Lin Yee Chung Association with Ballet Hawaii was denied a variance to allow a dance school at 3225 Pakanu Street and to allow off street parking on a grass surface. (96/Var-75).

Please review all of the facts in your files and deny the application for a conditional use permit. Thank you for your consideration.

Very truly yours,
Jesse Ikei
Jesse Ikei
3374 E. Manoa Road
Honolulu, Hawaii 96822

Jl/jc
cc: Ms. Joan Takano, DLU
Office of Environmental Quality Control (QECC)
Council Member Andy Minkitani
Manoa Neighborhood Board Member Brian Baron

會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

2430 E. MANOA RD.
HONOLULU, HI 96822

PHONE: (808) 588-5543

October 15, 1998

Mr. Jesse Ikei
3374 East Manoa Road
Honolulu, HI 96822

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

Dear Mr. Ikei:

This is in response to your letter of August 2, 1998 to Ms. Jan Naoe Sullivan, Director of the Department of Planning and Permitting with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction. We recognize the concerns expressed by you and our other long term neighbors and are doing our best to address them. Our response to the specific points that you raised is as follows:

Ballet Hawaii as a Business

Ballet Hawaii is a non-profit organization that is providing a community service. It is not a commercial operation.

Noise

We think that the measures that are being planned will mitigate potential noise impacts on nearby neighbors. The sliding glass doors located on the Pakanu Street (makai) side of the Pavilion will be kept closed during dance classes. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

The Department of Health has affirmed that they have no noise concerns in a letter dated July 29, 1998.

Traffic

Parents and students will be required to adhere to the ballet school's self-instituted traffic and parking plan to avoid causing traffic impacts in the neighborhood. A joint parking arrangement between Lin Yee Chung Association and Ballet Hawaii will be enforced. Vehicular parking generated by the ballet school can and will be accommodated within the Cemetery. If headlight glare from within the driveway leads to impacts on neighboring properties, then vegetative screening to help block headlights from the shining from the driveway will be considered.

Other Comments

It is clear from your comments that you do not think that the use of the pavilion by Ballet Hawaii for ballet classes and rehearsals is an appropriate use in a residential district. We respectfully disagree. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. The lives of our children and grandchildren are enriched by these activities, and our communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,

Winifred K.W. Lum

Winifred K.W. Lum
Lin Yee Chung Association

August 5, 1998

Jan Sullivan
Director of Planning and Permitting
650 S. King St. 6th Floor
Honolulu, HI 96813

'98 AUG 7 PM 4 55

DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

Re: Conditional Use Permit for the Lin Yee Chung Assoc.
File Number: 98/CUP1-036

Dear Jan:

This is just a short note to express my opposition to the proposed conditional use permit at the Manoa Chinese Cemetery. I understand that the property in question is on the State Register of Historic Places. I can't understand the connection between a Historic Place and a ballet school. I would think that a Chinese Folk Dancing Studio or having something of a more historic purpose would be more appropriate for this location.

Manoa Valley has always been a quiet, secluded location for me as I was growing up in the valley, and it seemed like the mountains always protected us as kids. With the advent of a commercial enterprise such as a dance studio, the traffic will increase and of course the noise levels would increase and the peace and solitude of the area would be changed to the detriment of the local residents. I just don't think that it is an appropriate venture for the Manoa Community.

This may not be such a strong argument against the Conditional Use Permit, but it is more of an emotional appeal to preserve the peace and serenity of the upper valley. Please consider this appeal as strongly as you would more definitive arguments against this project.

Mahalo,


Allen Kamemoto
Former resident

ALLEN M. KAMEMOTO, CFR, CLU
Certified Financial Planner
1163 S. Beretania Street
Honolulu, Hawaii 96814

PLANNING • INSURANCE • INVESTMENTS

'Ohahele

會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MANOA RD.
HONOLULU, HI 96822

PHONE: (800) 988-5543

October 15, 1998

Mr. Allen Kamemoto
1163 S. Beretania Street
Honolulu, HI 96814

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

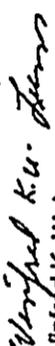
Dear Mr. Kamemoto:

This is in response to your letter of August 5, 1998 to Ms. Jan Nabe Sullivan, Director of the Department of Planning and Permitting, with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction.

It is clear from your comments that you do not think that the use of the pavilion by Ballet Hawaii for ballet classes and rehearsals is an appropriate use in a residential district. We respectfully disagree. Ballet Hawaii is a non-profit organization that is providing a community service. It is not a commercial operation. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. We are not aware of complaints that these activities destroy the "peace and serenity" of these communities. We believe the lives of our children and grandchildren are enriched by these activities, and our communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,


Winifred K. W. Lum
Lin Yee Chung Association

0000 00 12 1632

July 30, 1998

Ms. Jan Naoe Sullivan
Director of Planning and Permitting
City and County of Honolulu
Department of Planning and Permitting
Land Use Approval Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

'98 AUG 4 PM 2 13

DEPT OF PLANNING
and PERMITTING
CITY & COUNTY OF HONOLULU

Dear Ms. Sullivan,

I would like to voice my concern against the application for a conditional use permit to allow dance school use at the Manoa Chinese Cemetery (File #: 98/CUP1-036). I feel strongly that both organizations may be taking undue advantage of their status as non-profit organizations that do not support our tax structure. I believe that the cemetery should be limited to using their tax exempt properties only for those activities for which they were initially intended. To say that they now need an additional variance to what would normally be allowed because they are on the historical registry seems to me either a mismanagement of their resources or a distortion of their true need. In any case, I feel that their need to maintain their property should not come at the expense of that community that already allows them considerable fiduciary advantages.

Respectfully,


Kazuo Kamemoto
3380 East Manoa Road
Honolulu, Hawaii 96822

會義聯那萬
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MANOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

October 15, 1998

Mr. Kazuo Kamemoto
3380 East Manoa Road
Honolulu, HI 96822

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Sireet, TMK 2-9-043 001

Dear Mr. Kamemoto:

This is in response to your letter of July 30, 1998 to Ms. Jan Naoe Sullivan, Director of the Department of Planning and Permitting with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction.

Your comments indicate that you do not think that the Lin Yee Chung Association should be allowed to use the pavilion, and by extension, its other properties, for any activity not directly connected to the primary use of the property as a cemetery, and that both the Association and Ballet Hawaii are somehow taking advantage of their tax-exempt status in seeking the proposed use of the facility. We respectfully disagree. We believe we are relieving taxpayers by providing important community services. If there were no private cemeteries, burial services would have to be provided through taxpayer funds. Similarly, Ballet Hawaii was originally operated by the City and County of Honolulu using public funds and is now supported by the Friends of the Ballet.

Having tax-exempt status does not relieve non-profit organizations from the burden of raising income to further their eleemosynary activities. We attempt to do this in a way that benefits the community. We believe both the Lin Yee Chung Association and Ballet Hawaii are making an important contribution to Manoa. The cemetery provides attractive open space that would not otherwise be there. There have been times in the past when we were unable to pay for proper upkeep of the grounds and the neglect had a noticeable negative impact on the community. Without a reliable source of income this could happen again.

Ballet Hawaii also contributes to the community. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. The lives of our children and grandchildren are enriched by these activities, and our communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,

Winfred K. W. Lum
Winfred K. W. Lum
Lin Yee Chung Association

July 27, 1998

Ms. Jan Naoe Sullivan
Director of Planning and Permitting
City and County of Honolulu
Department of Planning and Permitting
Land Use Approval Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813

98 JUL 30 PM 1:28

DEPT OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

Dear Ms. Sullivan,

I am writing in regard to the application for a conditional use permit to allow dance school use at the Manoa Chinese Cemetery (File #: 98/CUPI-036). After reviewing the draft Environmental Assessment I am concerned about the noise impact on the nearby residences that I feel were not adequately addressed in this document.

My first concern is that the noise generated by the piano, amplified music, and teachers calling out instructions may not be as insignificant as claimed. The measurements taken by the acoustical consultants and reported as not contributing to the noise environment were made from the southwest corner of Pakanu and East Manoa and does not represent the area most impacted by the noise. The properties directly across from and downwind of the pavilion are nearly half as far as the corner from which the readings were reported. Also, the readings do not include the instructors' projected voices which, from my experience, are significantly louder and more intrusive. Although the report tries to address the possible negative impact of amplified music on the nearby residential area, the report fails to: 1) measure the volume of that music, 2) prove that in fact the sounds generated can be mitigated by merely closing the glass doors or moving the speakers, and 3) state whether they plan on closing the doors during the day. They have also failed to prove their claim that the noise complaints that forced them to vacate their previous sight could have been mitigated by replacing the missing jalousie window panes. These omissions have put doubt in my mind as to whether the sound levels can be expected not to exceed the A-weighted equivalent value of the LUO and not result in any significant or adverse impacts on our community. My experience suggests otherwise.

One aspect of a dance school attempting to co-exist with a predominantly residential community may not lie solely upon the "loudness" of the generated sounds but the very nature of a teaching and rehearsing routine that can be repetitious to the point of becoming a significant annoyance. As reported in their document, classes are proposed six and a half days a

0000 00 12 1635

會義聯那萬
Lin Yee Chung Association

(MANOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MAHOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

October 15, 1998

Mr. Larry Kamemoto
Lorrie Y. W. Chang
3576-B Pinao Street
Honolulu, HI 96822

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

Dear Mr. Kamemoto and Ms. Chang

This is in response to your letter of July 27, 1998 to Ms. Jan Naoe Sullivan, Director of the Department of Planning and Permitting with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction. We recognize the concerns expressed by you and our other long term neighbors and are doing our best to address them. Our response to the specific points that you raised is as follows:

Noise

Specific measures are being planned that will mitigate any noise impacts on nearby neighbors. The sliding glass doors located on the Pakanu Street (makal) side of the Pavilion will be kept closed during dance classes. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

The Department of Health has affirmed that they have no noise concerns in a letter dated July 29, 1998.

week, ten hours or more a day, and the music is often repeated not only in each individual class but sometimes throughout the day, and not only during each day but throughout the week, month, and year. It can be argued that this repetitious music, being distinctly audible, may contribute undue stress. Especially in the case of the use of recorded and amplified music from September through December from 7:30 to 9:30 at night for their annual Nutcracker performance, it can become tiring indeed.

The last issue I'd like to address, and one that may not have been considered, is the nature of the impacted community. More than half are retired, elderly, some with significant health problems, who need to sleep or rest during the day. Most have lived all their lives in an area fronting a cemetery that may be even more quiet than a typical suburban community. The impact on these residents should not be taken lightly nor should we assume that the proposed means of reducing the intrusion to their health and well being can so easily be mitigated. I can appreciate that in these economic times we may feel compelled to gain income (as in the case of the cemetery's resources) and to reduce costs (as in the case of the dance school), but I truly believe that this should not come at the expense of their neighbors, both in the value of their properties and the quality of their lives.

Thank you for your attention to these matters.

Respectfully,

Larry Kamemoto

Larry Kamemoto
Lorrie Y. W. Chang
Property Owners of:
3228 Pakanu St.
Honolulu, HI 96822

Mailing Address:
3576-B Pinao St.
Honolulu, HI 96822

Compatibility with Residences

It is clear from your comments that you do not think that the use of the pavilion by Ballet Hawaii for ballet classes and rehearsals is an appropriate use in a residential district. We respectfully disagree. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. The lives of our children and grandchildren are enriched by these activities, and our communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,



Winfred K. W. Lum
Lin Yee Chung Association

August 5, 1998

KRP Information Services
1314 S. King Street, Suite 951
Honolulu, Hawaii 96814

This letter provides comments on the Draft Environmental Assessment (DEA) regarding the Use of the Manoa Chinese Cemetery Pavilion for Ballet Classes and Rehearsals. I submit this for your review, however, as a hired consultant of the Lin Yee Chung Association, your objectivity on this issue is suspect.

My comments on the DEA can be addressed as Concerns and Contradictions. I conclude my response with questions to consider:

Concerns:

KRP InfoServices: Jacqueline A. Parnell is employed by KRP InfoServices. According to Zoning Variance Request No. 95/VAR-41, Jacqueline A. Parnell is listed as the Agent for Applicant Ballet Hawaii. As an Agent for Ballet Hawaii, shouldn't the findings of the DEA be questionable? More so, are there documents available to show that other professional companies were interviewed? If so, Requests for Proposals (RFP) should be readily available from the Lin Yee Chung Association. If not, would the Association be willing to consider hiring a more "objective" company?

Collete Sakoda: Collete Sakoda is listed in the List of Preparers. According to Zoning Variance request No. 96/VAR-75, Collete Sakoda is listed as the Agent for Ballet Hawaii. The same situation applies with Ms. Parnell. How can this report be objective when two Agents employed by Ballet Hawaii are preparing the DEA?

List of Preparers: What is the professional relationship between Ms. Parnell and the other preparers? They all seem to come to the same conclusion. Would financial disclosures of KRP InfoServices and the hired Preparers be available for public review? If there are any previous financial relationships, this would also cloud the "objectivity" of the DEA.

Agencies and Individuals Consulted in Preparation of the Draft Environmental Assessment: The list notes elected officials were contacted, but it does not say whom. Councilmember Andy Mirikitani is on record opposing this proposal. As the Councilmember representing the area, was he contacted? Also, shouldn't Malama O Manoa be contacted considering they supported a Special Design District (SDD) Ordinance proposal in the past. The SDD was proposed to secure the special qualities of Manoa Valley. This proposal would conflict with that intent.

Findings and Anticipated Determination

The findings pertain to Chapter 200 of Title 11 Administrative Rules of the State Department of Health. There are no references to the Department of Land Utilization's denials of Variance Applications on December 8, 1995 and March 20, 1997.

The DEA finds:

(4) *Substantially affects the economic or social welfare of the community or state;* The proposed action will not substantially affect economic or social benefits of the community or state.

The DLU finds:

1. The applicant would not be deprived of reasonable use of such land or building if the provisions of the zoning code were strictly applicable.
2. The request is not due to unique circumstances and the reasonableness of the neighborhood zoning is drawn into question.
3. The application does alter the essential character of the neighborhood and is contrary to the intent and purpose of zoning.
4. Essentially, the dance school should be established in a business district, of which there are many throughout Oahu.
5. The proposal challenges the reasonableness of the neighborhood zoning because it seeks to legalize a business use which is not permitted.
6. The proposal has already altered the essential character of the neighborhood by establishing an unauthorized and incompatible business use, and by disturbing the tranquility of neighbors.
7. The purpose of business districts is to set aside areas for commercial and business activities to meet and support the economic growth of the city. In contrast, the purpose of the preservation districts is to preserve and manage major open space and recreation lands, and lands of scenic and other natural resource value.
8. The proposal to allow a ballet school which is not permitted is tantamount to rezoning a portion of the site to a business district.
9. In order for the Director to approve a variance, an applicant must meet all 3 hardship tests. Essentially, the request fails to meet the 3 Charter-required hardship tests, and cannot be supported.

Alternatives to the Proposed Action:

The Association claims economic hardship. However, recent Ching Ming Festivals indicate the opposite. The presence of the Royal Hawaiian Band, U.S. Marine Corps Marching Band, Military Color Guard, gun salute, racing pigeons, attendance of government and community officials and helicopter flower drop hardly suggests an economic hardship.

Are records available from the Association to indicate any discussions with other groups seeking to use the facilities?

Alternative Sites for Ballet Hawaii:

Ballet Hawaii has contacted 39 other facilities during the last several years. Are records available to prove this? If so, at what stage were negotiations at before being terminated?

City and County of Honolulu General Plan:

Policy 5 - Seek public and private funds, and public participation and support, to protect social, cultural, historic, architectural, and archaeological resources.

Has the Association sought public and private funding?

Public Services:

Is there enough space for a fire engine to enter the premises of street parking is taken? Page 6 of the DEA notes: "On specified occasions, cars exiting the triangle site between the complaining neighbor and the school site, entered a narrow roadway which, when parked cars were also present, caused congestion." The reports finds otherwise.

If cars are parked on the street and the report finds that "45 vehicles arriving and departing the site within a 15 minute period" (Page 6), what would happen if there were an emergency with all the congestion? What is the liability of the City, Ballet Hawaii and Association?

Noise:

The DEA cites a noise survey conducted on October 11, 1996. However, on February 27, 1996, the Building Department cited the applicant (notice of violation No. HV96-2-147) for conducting ballet classes in the P-2 District. And on March 20, 1997, the DLU DENIED Zoning Variance No. 96/VAR-75. The date of the survey is suspect since it was conducted after the citation was issued. The survey suggests that regardless of the citation Ballet Hawaii planned to use the facilities.

The time of the survey is also questionable. The survey was conducted between 5:45 P.M. and 6:30 P.M. During the time of the survey, were ballet classes being held? If so, it would be in violation of the Building Department's citation and if not, was it the value of the survey if it wasn't done during the actual class situation?

The noise findings also contradict the findings of Char and Associates. Char recommends "that a dense planting of shrubs be put between the Italian cypress trees along Pakanu Street." This would provide mitigation for noise and also screen the ballet activities from the street level. Darby and Associates suggest "Impacts have been determined to insignificant." Why plant trees to mitigate noise?

The location of loudspeakers and restricting the volume suggests a concern of noise control.

The Adam's report includes an acoustical consultant whose daughters' and granddaughters' participated in ballet concluded minor noise impacts. Has the consultant's daughters' and granddaughters' participated in Ballet Hawaii? If so, are the findings objective? More so, what are the basis of his findings?

The Adam's report also notes that many students will walk or bicycle to class. What are the basis of his findings? Does this include evening classes? If so, what about the safety of the students?

If doors are closed on the south side of the pavilion for noise mitigation, what will happen to air circulation for children?

Traffic:

Page 5 of the DEA notes: Peak hourly traffic volumes were estimated from these counts and manual counts taken on three Saturdays in the fall of 1997 by Ballet Hawaii. On March 20, 1997, the DLU DENIED Zoning Variance No. 96/VAR-75. Similar to the noise survey, the date of the survey is suspect, but in this case it appears that Ballet Hawaii may have been conducting classes contrary to the DLU's order. Again, the survey suggests that regardless of the City's action, Ballet Hawaii planned to use the facilities.

Cemetery:

The grounds of a Cemetery are sacred. The Ballet School is a commercial activity. More so, if classes are held at night during the Winter, what are the psychological impacts of the children on the premises?

Ballet Hawaii:

Ballet Hawaii has operated for 23 years, without a permanent studio.

Pertinent Facts not Cited:

- On June 30, 1995, the Building department issued a notice of violation (No. EX95-6-5) for operating a dance school, which is not a permitted use.
- On September 12, 1995, the DLU issued a notice of order (No. 95/LUV-160) for operating a dance school in a Residential District.
- On December 8, 1995, the DLU DENIED Zoning Variance No. 95/VAR-41.
- On February 27, 1996, the Building Department cited the applicant (notice of violation No. HV96-2-147) for conducting ballet classes in the P-2 District.
- On March 20, 1997, the DLU DENIED Zoning Variance No. 96/VAR-75.

Conclusion:

This is the same application save for the late amendment without public input to add a parking lot. The facts remain the same, nothing has changed. It is a business practice in a Preservation zoned property. I question what circumstances could have changed to necessitate approval of a variance. The DLU decision is based on identical facts from the previous application, thus it should be denied.

There is an abundant supply of building vacancies that are suitable for Ballet Hawaii. In addition, the applicant is seeking a use that is not reasonable. Traffic, noise, and congestion are not suitable for residential neighborhoods. Jackie's Flatiers confirmed that these types of activities are not suitable for residential neighborhoods.

There are many suitable places for this business practice in Manoa Valley. How about Manoa Valley Theater or area school cafeterias? These places would be ideal since there is adequate space and parking. In fact, many of the students would be more comfortable with a school cafeteria than a grave yard. It is not reasonable to put a business practice in a residential community when there are other more appropriate places within 5 minutes

You have confirmed this with your ruling in 1995. Nothing has changed. The character of the neighborhood would be dramatically altered with traffic, noise and congestion. The purpose of zoning is to place suitable practices in suitable areas. This variance is not conducive for the area. It is a divergence of zoning policy, it not consistent with the

0000 00 12 16 38

Page 6
KRP Informservices
08/05/98

resident's feelings, and it is not any different from 1995 year when you denied the application.

There are no hardships involved for Ballet Hawaii. The only hardship is for my neighbors and I to spend time before you opposing the variance. Ballet Hawaii says "While dance schools per se are not allowed in the district," they are more comparable than other activities held in other structures. Ballet Hawaii confirms that the School is not allowed in the district.

Ballet Hawaii has previously stated that street parking is not a problem.

I am confused why they want to add a parking area (without public input) if parking is not a problem. Would the Neighborhood Board support a parking lot in a residential area? The answer seems clear since Ballet Hawaii secretly amended this variance application without the Neighborhood Board's knowledge. This issue must be reviewed by the Neighborhood Board. Also as a member of Malama O Manoa, they must be given the opportunity to comment as well. I am certain no one in Manoa valley wants another parking lot. And finally, environmental impacts of run off must also be reviewed.

Good Faith of Ballet Hawaii.

Ballet Hawaii operated illegally and was fined by the DLU. The imposition of the fine forced Ballet Hawaii to seek a variance rather than pursuing more appropriate means such as amending the zoning. When the variance application was denied, Ballet Hawaii considered appealing the decision. However, when informed that if the appeal was denied the application process would be terminated completely, Ballet Hawaii withdrew its appeal and waited a year to reapply. This alone indicates that Ballet Hawaii knew the chances of winning the appeal were slim. The year has past and the same application resurfaces. However, after gaining support from the Manoa Neighborhood Board, Ballet Hawaii amends the application to add a parking lot without public comment.

Malama O Manoa. Malama O Manoa is a neighborhood organization which was created to protect and promote the uniqueness of Manoa Valley. There are members of this organization who sit on the Neighborhood Board. Last year, Ballet Hawaii performed for Malama O Manoa at a gathering. It is interesting to note that the Board members with ties to Malama O Manoa voted to support the variance. In addition, the variance application which supports commercial activities in a Preservation Zone appears to be a contradiction to the mission statement of Malama O Manoa.

There are other available sites in the valley.

As Indicated previously, there are numerous alternative sites in the valley which can support Ballet Hawaii activities. There are schools, commercial space, and even the

Page 7
KRP Informservices
08/05/98

Manoa Valley Theater. Moreover, Punahou School would seem to be the ideal place since it has lots of parking and appropriate areas. Have these other alternatives been considered by Ballet Hawaii. It would appear that Ballet Hawaii has not investigated these options and chose to force the issue through the variance process. When Ballet Hawaii was denied the variance in 1995, did they seek other more appropriate alternatives in the valley or dig in their heels to force this issue. The answer is clear.

We are merely seeking what is our rights.

Ballet Hawaii's variance application in unfair. We the adjacent residents, who oppose this variance are stereotyped as NIMBYs. That is far from the case. We are only trying to preserve our rights to a peaceful quiet neighborhood. We purchased our homes knowing a cemetery was next door which is supposed to be a sanctuary. We could have chose to live in a business zone, but opted for serenity. How many Ballet Hawaii student parents understand the true issue of seeking a variance in an inappropriate zone? Some parents might consider our opposition as hindrances, but if they knew Ballet Hawaii was operating illegally in the first place, would they support the school or the variance?

I ask you to consider the opinions of those who are most directly affected by this application and do the right thing.

Thank you for your time and consideration. If you have any questions, please call me at 988-3555.

Sincerely,



Keith Okimura

cc: Mayor Jeremy Harris
Jan Sullivan, DLU
Joan Takano, DLU
State Office of Environmental Quality Control
Senator Brian Taniguchi
Councilmember Andy Minkitani
Representative Ed Case

0000 00 12 1639

會義聯那萬

Lin Yee Chung Association

(MANOA CHINESE CEMETERY)
EILEEMOSYMARY

3430 E. MANOA RD.
HONOLULU, HI 96822

PHONE: (808) 988-5543

October 15, 1998

Mr. Keith Okimura
3366 East Manoa Rd
Honolulu, HI 96822

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

Dear Mr. Okimura:

This is in response to your letter of August 5, 1998 with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction. We recognize the concerns expressed by you and our other long term neighbors and are doing our best to address them. Our response to the specific points that you raised is as follows:

Preparers

No Request for Proposal was issued. All of the preparers of the Draft and Final EAs are unpaid volunteers and are contributing their time and materials. There are no "financial relationships" to disclose.

Consulted Parties

We believe we provided opportunities for everyone who desired to become a consulted party to do so. Councilman Mirikitani's comments and our response will be included in the Final EA.

Previous Variance Request

This application is for a Conditional Use Permit under a different section of the Land Use Ordinance. The standards for a CUP are different from those for a variance.

Alternative to the Proposed Action

The Association has made many efforts to secure regular income to support religious observances and maintenance of the cemetery. We would be happy to meet with you to discuss these.

Alternative Sites for Ballet Hawaii

As noted in the Draft EA, Ballet Hawaii has been searching for suitable facilities for several years. Places that have been contacted include Leeward Community College ('91), Temple Emanuel ('91) St. Francis School ('91), Manoa Marketplace ('91), Kakaako Fire Station ('92), Chinese Cultural Center ('93), Maryknoll School ('93), Daingung Temple ('95), Ward Warehouse ('96), Kodak Building ('93), Waioli Tea Room, and numerous others. Most of the sites were unsuitable because of scheduling conflicts. Others were unsuitable because they were available only on a short-term basis, lacked parking, and/or were for rent beyond the Ballet's ability to pay. Ballet Hawaii has a complete list of all facilities that it has contacted and would be glad to share it with you.

Public and Private Funding

The Association exists only because of private funding. It has not applied for public funding.

Public Services

The maximum traffic volumes used in the analysis indicated that the existing unsignalized intersection would be adequate. As is the case whenever an emergency exists, individual drivers have the responsibility to take action to allow access to any emergency vehicles. Please see the response letters from the Fire and Police Departments

Noise

Your comments and questions on the noise assessment were referred to David L. Adams who provided the following response:

- 1 The environmental noise assessment study conducted by D. L. Adams Associates, Ltd. utilized the data from a noise survey conducted on October 11, 1996 (Reference 6 of the D. L. Adams Associates' *Environmental Noise Assessment Report*, dated February 13, 1998) to assess the then existing acoustical environment, as well as the levels produced at various locations due to a piano being played inside the pavilion.
2. The time of day for the October 11, 1996 noise survey is as stated in the noise survey results. Neither the Adams report nor the noise survey results stated that ballet classes were being conducted at the time of the October 11, 1996 noise survey. Measurements were taken with and without a piano playing.

3. The D. L. Adams Associates report does not contradict the findings of Char and Associates. It simply does not recommend the planting of trees and shrubs as a means of mitigating noise from the pavilion.
4. The location of loudspeakers and restricting the volume was recommended as a method of noise mitigation.
5. It is unknown whether Mr. Ronald A. Darby's daughters and granddaughters participated in Ballet Hawaii. This is not relevant to this study or to the reference made to the RAD Engineering, Inc., October 24, 1996 facsimile. Mr. Darby's investigation was based on his personal experience with ballet schools and nearly thirty years of experience as an acoustical consultant. Without doubt his findings, the result of a theoretical analysis of the anticipated sound levels from a ballet studio located at the Manoa Chinese Cemetery pavilion, were objective.
6. As stated in the D. L. Adams Associates report, "...the fact that one-third of the Ballet Hawaii students reside in the Manoa/Makiki area," leads to the logical conclusion that many students will probably walk or bicycle to class.
7. The D. L. Adams Associates report suggested that for Nutcracker Suite rehearsal uses that may occur during the evening hours (7:30 P.M. to 9:30 P.M.) from September through December, the sliding doors on the south side of the pavilion could be closed to reduce the noise propagating to the nearby homes. During this time of the year, the sun has already set or is setting by 7:30 P.M. and the temperature will have normally fallen from its high during daylight hours. If additional air circulation is desired, fans could be used.
8. The Department of Health has affirmed that they have no noise concerns in a letter dated July 29, 1998.

Traffic

Your comments and questions on the traffic assessment were referred to Julian Ng who provided the following response:

The survey dates are as reported by Ballet Hawaii. The traffic counts were used to estimate existing traffic volumes without the ballet classes; in the analyses, estimates of the increases in traffic due to the ballet classes were added to the existing traffic volumes. Capacity analyses of future traffic (existing plus project traffic) were done to determine conditions if the proposed uses were in place.

Cemetery

We are not sure if your question refers to impacts of the children or impacts on the children. If the point focuses on the latter, then the impact could be positive as the

children would learn that there is no fear or threat to attending classes in a cemetery at any time of the year. Whatever misplaced fears adults may have had in association with cemeteries can be turned into a positive and wholesome co-existence which would then result in children's long-term impression of cemeteries, free of unnecessary fears.

Other Comments

It is clear from your comments that you do not think that the use of the pavilion by Ballet Hawaii for ballet classes and rehearsals is an appropriate use in a residential district. We respectfully disagree. Ballet Hawaii is a non-profit organization that is providing a community service. It is not a commercial operation. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private residences. The lives of our children and grandchildren are enriched by these activities, and communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,

Winifred K. W. Lum
 Winifred K.W. Lum
 Lin Yee Chung Association

0000 00 12 1642

98-05173

98 AUG 7 PM 3 21
DEPT. OF PLANNING
AND PERMITTING
CITY & COUNTY OF HONOLULU

Ms. Jan Naoe Sullivan
Director of Planning and Permitting
City and County of Honolulu
Department of Planning and Permitting
Land Use Approval Branch
650 South King Street, 7th Floor
Honolulu, Hawaii 96813
Fax: (808)527-6743

August 4, 1998

Dear Ms. Sullivan,

We are writing to you in regards to the Application for a Conditional Use Permit, Type 1 for Use of Historic Structures, to allow a dance school on the property owned by the Lin Yee Chung Association. (File Number 98/CUP1-036) The property is located at 3225 Pakanu Street, at the Manoa Chinese Cemetery. We live across the cemetery at 3246 Pakanu Street.

We have reviewed the environmental assessment and have concerns regarding noise. The measurements that were made were at the southwest corner of Pakanu Street and East Manoa Road. Why weren't the readings done further down, across from the pavilion? We feel that it would give a better indication of the impact of the noise. We lived at my parents' home for 4 months and heard the very loud recorded music when the Ballet School was located on East Manoa Road. Ballet music, other dance music, and tap dance were very disturbing. Since the approval for the ballet school may also include other dances, we are very concerned that other music wasn't included in the noise assessment. The Environmental Noise Assessment done by D. L. Adam Associates, Ltd. stated that "it is conceivable that the use of a sound amplification system for the playback of recorded music could cause annoyance and disturbance for nearby residents on the south side of Pakanu Street, if not properly set up and operated." What assurance is there that the dance school will aim the loudspeaker system "toward the north side of the pavilion, away from Pakanu Street and several smaller loudspeakers should be used rather than one large one", as suggested? Who will monitor the noise level once the approval is given?

We also have concerns about traffic. In the assessment it is noted that there is overflow parking for 44 cars. Today, when we visited the area as indicated in Figure 8 in Julian Ng, Incorporated's Traffic Assessment, we saw no indications of a parking area. It is a grassy area. It will be congested to go in and out of that area. We visualize problems in parking on the property. Therefore many cars may park on the public street, possibly creating dangerous situations, as students come and go.

We feel that the Ballet School does not belong in Manoa and in a P-2 General Preservation District. It will also change the tranquility of the valley. Thank you so much for your time.

Sincerely,

Diane A. Shimazu
Reuben T. Shimazu

Diane A. Shimazu
Reuben T. Shimazu
3246 Pakanu Street
Honolulu, Hawaii 96822

會義聯那葛
Lin Yee Chung Association
(MANOA CHINESE CEMETERY)
ELEMOSYNARY

3430 E. MAHOA RD.
HONOLULU, HI 96822

PHONE: (809) 988-5543

October 15, 1998

Diane A. Shimazu
Reuben T. Shimazu
3246 Pakanu Street
Honolulu, HI 96822

Re: Draft Environmental Assessment (DEA) for a Conditional Use Permit, Type 1,
for Use of a Historic Site (File No. 98/CUP-36)
Manoa Chinese Cemetery, 3225 Pakanu Street, TMK 2-9-043 001

We are in receipt of your letter of August 4, 1998 to Ms. Jan Sullivan with your comments on the proposed use of the Cemetery's pavilion by Ballet Hawaii for rehearsals and dance instruction. We recognize the concerns expressed by you and our other long term neighbors and are doing our best to address them. Our response to the specific points that you raised is as follows:

Noise

The sliding glass doors located on the Pakanu Street (makai) side of the Pavilion will be kept closed during dance classes. If amplifiers/speakers are used by the instructor, volume will be controlled with several small loudspeakers (instead of one large one) directed toward the north side of the Pavilion, away from Pakanu Street. Additionally, as yet another preventive measure that will help avoid any noise problem, increased vegetative screening along the Pakanu Street side of the Pavilion building is being considered by the Cemetery Association.

Parking and Traffic

Parents and students will be required to adhere to the dance school's self-instituted traffic and parking plan to avoid causing noise or traffic impacts in the neighborhood. Vehicular parking generated by the ballet school can and will be accommodated within the Cemetery.

It is clear from your comments that you do not think that the use of the pavilion by Ballet Hawaii for ballet classes and rehearsals is an appropriate use in a residential district. We respectfully disagree. Ballet Hawaii is a non-profit organization that is providing a community service. It is not a commercial operation. Virtually all ballet and hula instruction in Honolulu takes place in residential neighborhoods, often in private

residences. The lives of our children and grandchildren are enriched by these activities, and communities by their presence.

We shall continue to try to be good neighbors.

Sincerely yours,

Winfred Kw. Lum
Winfred K. W. Lum
Lin Yee Chung Association

0000 00 12 1643

0000 00 12 1644

