

NAME: Miranda Camp

**Interrogatory #1:** Describe fully how you “would be adversely affected if the revocable permits were held over for another year,” as alleged in paragraph 14 of the Sierra Club’s First Amended Complaint.

Plaintiff objects to this interrogatory because: (a) the request is duplicative of information already provided; and (b) the request is unnecessarily burdensome given the materials previously provided to the defendants.



\_\_\_\_\_  
David Kimo Frankel  
Attorney for the Sierra Club

Subject to and without waiving these objections, I previously submitted a declaration dated February 15, 2019 and answered questions in a deposition on May 31, 2019. I incorporate those responses.

I have led Sierra Club hikes to or along Makapipi, Punaluu, Wailuaiki, Waikamoi, Kōlea, and Wahinepe‘e streams. I have also hiked to, or along, Nailiilihaele, Papaaea, Hoalua, Oopuola, Puehu, Hanehoi and Honopou streams. Flowing streams bring me joy and enhance my hiking experience. I also enjoy seeing ‘o‘opu when there is sufficient water for them to survive. I have witnessed diversions on streams and, of course, seen a lot of the water flowing into the diversion and then there not being much water below that diversion. The diversion of streams diminishes my enjoyment of being in nature. The diversions authorized by the continuation of the revocable permits harm my aesthetic, recreational and environmental interests. An increase in the amount of water diverted from east Maui streams will further diminish my enjoyment of the east Maui watershed.

**Interrogatory #2:** Describe fully how you have been harmed or will be harmed by the Board of Land and Natural Resources’ October 2019 decision to continue the subject revocable permits for calendar year 2020.

Plaintiff objects to this interrogatory because: (a) the request is duplicative of information already provided; and (b) the request is unnecessarily burdensome given the materials previously provided to the defendants.



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David Kimo Frankel  
Attorney for the Sierra Club

Subject to and without waiving these objections, the answer to this question is the same as #1 above.



Civil No. 19-1-0019-01 (JPC)

**Defendant A&B/EMI's Exhibit AB-80**

FOR IDENTIFICATION \_\_\_\_\_

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