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 previousily 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 previousily provided to the defendants.

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.

**Interrogatory #3**: Describe fully the irreparable harm that you will suffer if the diversion of water authorized by the Board of Land and Natural Resources' October 2019 decision to continue the subject revocable permits for calendar year 2020 continues for calendar year 2020 (*i.e.*, if Sierra Club's request for an injunction is not granted).

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 previousily provided to the defendants.

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.

**Interrogatory #4**: Describe whether and to what extent the harm that you have suffered or will suffer as a result of the Board of Land and Natural Resources' October 2019 decision to continue the subject revocable permits for calendar year 2020 is different than the harm that you have suffered as a result of the Board of Land and Natural Resources' November 2018 decision to continue the subject revocable permits for calendar year 2019.

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 previousily provided to the defendants.

David Kimo Frankel

Attorney for the Sierra Club

Subject to and without waiving these objections, the nature /character of the harm is the same as discussed in #1 above. I have no idea which streams A&B is planning to take additional water from this year.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: _	Kihei	, Hawaiʻi,	3/6/2020	•
	(city)		(date)	
		Docusigned by:		
		Miranda Camp		.,
		Signatur@A28EF44B3EC4DC		
		Miranda	Camp	
		Print Name		

Civil No. 19-1-0019-01 (JPC)				
Defendant A&B/EMI's Exhibit AB-80				
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CLERK				