

IN THE CIRCUIT COURT OF THE FIRST CIRCUIT

STATE OF HAWAI'I

SIERRA CLUB,	)	CIVIL NO. 19-1-0019-01 JPC
	)	(Environmental Court)
Plaintiff,	)	
vs.	)	DECLARATION OF PAUL CARTER
	)	
BOARD OF LAND AND NATURAL	)	
RESOURCES, DEPARTMENT OF LAND	)	
AND NATURAL RESOURCES, SUZANNE	)	
CASE in her official capacity as Chairperson	)	
of the Board of Land and Natural Resources,	)	
ALEXANDER AND BALDWIN, INC., and	)	
EAST MAUI IRRIGATION, LLC	)	
	)	
Defendants.	)	
	)	

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**DECLARATION OF PAUL CARTER**

I, Paul Carter, under penalty of perjury hereby state the following is true and accurate to the best of my knowledge and belief:

1. The statements below are based upon my personal knowledge.
2. I live on, and am a resident of, Maui – and have been for decades.
3. I have been a member of the Sierra Club for decades.
4. I live very close to Waipio Stream.
5. I walk down to dip into the stream approximately five or six times a year.
6. When the water from the stream is diverted, I cannot dip in the water because there is none.
7. Approximately once a week, I walk to Hoolawa stream to swim in one of the pools there.

8. When the water levels in Hoolawa stream are low, there is too little water in some of the pools to swim in.

9. I enjoy the beauty and the sounds of a running stream.

10. I plan to continue visiting and using these streams, but my use is affected when too much water is diverted from these streams.

11. Allowing diversions to continue, or to increase, adversely affects my enjoyment of these streams.

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

DATED: Huelo, Hawai'i, 2-1, 2019.

  
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PAUL CARTER