

519106.1
WATANABE ING LLP
A Limited Liability Law Partnership

RECEIVED
OFFICE OF CONSERVATION
AND COASTAL LANDS

2016 AUG 22 A 11:47

J. DOUGLAS ING #1538-0
ROSS T. SHINYAMA #8830-0
SUMMER H. KAIawe #9599-0
First Hawaiian Center
999 Bishop Street, 23rd Floor
Honolulu, Hawaii 96813
Telephone No.: (808) 544-8300
Facsimile No.: (808) 544-8399
E-mails: rshinyama@wik.com

DEPT. OF LAND &
NATURAL RESOURCES
STATE OF HAWAII

Attorneys for
TMT INTERNATIONAL OBSERVATORY, LLC

BOARD OF LAND AND NATURAL RESOURCES

FOR THE STATE OF HAWAI'I

IN THE MATTER OF

Case No. BLNR-CC-16-002

A Contested Case Hearing Re
Conservation District Use
Permit (CDUP) HA-3568 for the
Thirty Meter Telescope at the
Mauna Kea Science Reserve,
Kaohe Mauka, Hamakua District,
Island of Hawaii, TMK (3) 4-4-
015:009

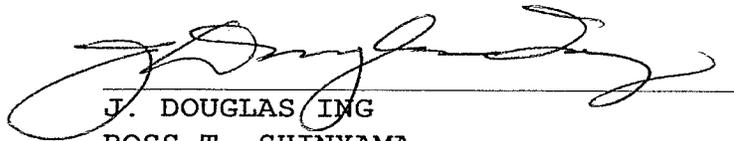
**TMT INTERNATIONAL OBSERVATORY,
LLC'S OBJECTIONS TO THE SITE
VISIT PROPOSAL BY CINDY FRIETAS;
CERTIFICATE OF SERVICE**

**TMT INTERNATIONAL OBSERVATORY, LLC'S OBJECTIONS TO
THE SITE VISIT PROPOSAL BY CINDY FREITAS**

TMT International Observatory, LLC ("TIO"), by and through its undersigned counsel, hereby submits its Objections to the Site Visit Proposal by Cindy Freitas.

The requests of Cindy Freitas are unreasonable and TIO objects to such requests. Assuming appropriate approvals are obtained, TIO may be willing to consider marking certain limited features at the location of the proposed observatory, but not to the extent or by the methods proposed by Ms. Freitas.

DATED: Honolulu, Hawaii, August 22, 2016.

A handwritten signature in black ink, appearing to read "J. Douglas Ing", is written over a horizontal line.

J. DOUGLAS ING
ROSS T. SHINYAMA
SUMMER H. KAIawe
Attorneys for TMT INTERNATIONAL
OBSERVATORY, LLC

BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

Contested Case Hearing Re Conservation
District Use Application (CDUA) HA-3568
for the Thirty Meter Telescope at the Mauna
Kea Science Reserve, Ka'ohē Mauka,
Hāmākua, Hawai'i, TMK (3) 4-4-015:009

BLNR Contested Case HA-16-02

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above referenced document was served upon the following parties by the means indicated:

Michael Cain
Office of Conservation and Coastal
Lands
1151 Punchbowl, Room 131
Honolulu, HI 96813
michael.cain@hawaii.gov
*Custodian of the Records
(original + digital copy)*

Carlsmith Ball LLP
isandison@carlsmith.com
*Counsel for the applicant
University of Hawai'i at Hilo*

Richard N. Wurdeman
RNWurdeman@RNWLAW.com
*Counsel for the petitioners Mauna
Kea Anaina Hou, Clarence
Kukauakahi Ching, Flores-Case
'Ohana, Deborah J. Ward, Paul K.
Neves, and Kahea: The
Environmental Alliance*

Harry Fegerstrom
P.O. Box 951
Kurtistown, HI 96760

Mehana Kihoi
uhiwai@live.com

C. M. Kaho'okahi Kanuha
kahookahi@gmail.com

Joseph Kualii Lindsey Camara
kualiic@hotmail.com

Torkildson, Katz, Moore,
Hetherington & Harris
lsa@torkildson.com
njc@torkildson.com
*Counsel for Perpetuating Unique
Educational Opportunities (PUEO)*

J. Leina'ala Sleightholm
leina.ala.s808@gmail.com

Maelani Lee
maelanilee@yahoo.com

Lanny Alan Sinkin
lanny.sinkin@gmail.com
*Representative for The Temple of
Lono*

Kalikolehua Kanaele
akulele@yahoo.com

Stephanie-Malia:Tabbada
s.tabbada@hawaiiantel.net

Tiffnie Kakalia
tiffniekakalia@gmail.com

Glen Kila
makakila@gmail.com

Dwight J. Vicente
2608 Ainaola Drive
Hilo, Hawaiian Kingdom

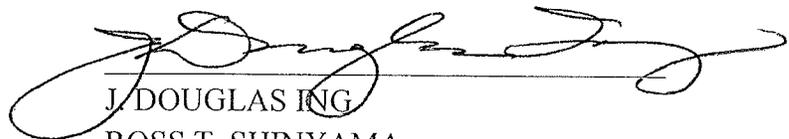
Brannon Kamahana Kealoha
brannonk@hawaii.edu

Cindy Freitas
hanahanai@hawaii.rr.com

William Freitas
pohaku7@yahoo.com

Richard L. DeLeon
kekaukike@msn.com

DATED: Honolulu, Hawaii, August 22, 2016.



J. DOUGLAS ING
ROSS T. SHINYAMA
SUMMER H. KAIawe

Attorneys for TMT International Observatory LLC