

Joseph K. L. Camara
kualiic@hotmail.com

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

**JOSEPH K. L. CAMARA'S RESPONSE TO
PERPETUATING UNIQUE EDUCATIONAL
OPPORTUNITIES INC.'S PROPOSED MINUTE
ORDER GRANTING PERPETUATING UNIQUE
EDUCATIONAL OPPORTUNITIES MOTION TO SET
THE ISSUES; EXHIBIT A, JOSEPH K. L. CAMARA'S
CRITICAL ISSUES; COS**

**JOSEPH KUALII LINDSEY CAMARA'S RESPONSE TO PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES
INC.'S PROPOSED MINUTE ORDER GRANTING PERPETUATING UNIQUE EDUCATIONAL OPPORTUNITIES
MOTION TO SET THE ISSUES.**

Here comes Joseph Kualii Lindsey Camara's response to the aforementioned proposed minute order (Doc 256) filed by Perpetuating Unique Educational Opportunities (PUEO) Inc. on September 9 2016.

The language used by Pueo in its proposed minute order suggest that it has been granted greater authority than the other parties in this case to propose and set the issues. I do not believe that this was the intent of the Hearings officer when she assigned them the task of submitting the first draft of the proposed issues in court on August 29, 2016.

It would be unfair and illogical to allow any one party greater authority than any other to set the issues that will be allowed for discussion in this hearing. Each party has a unique stance and position in this contested case, and therefore will have unique issue to be addressed in this hearing.

Exhibit "A" contains the issues that I, and the witnesses testifying on my behalf believe are critical to this contested case hearing and need to be addressed.

Me ke aloha aina,

Joseph K. L. Camara _____

Hilo, Hawaii _____

Received
Office of Conservation and Coastal Lands
2016 Sept 19 12:52 pm
Department of Land and Natural Resources
State of Hawaii

EXHIBIT A

JOSEPH KUALII LINDSEY CAMARA'S CRITICAL ISSUES

1. Native, indigenous, and human rights violations by the State of Hawaii, County of Hawaii, State Department of Land and Natural Resources (DLNR), University of Hawaii (UH) and the Thirty Meter Telescope (TMT) in attempts to develop the TMT on Mauna Kea. Also, violations that will occur if development is allowed to continue. This issue will be analyzed using State, Federal, and international laws, statutes and agreements.
2. The impact of the TMT development , as well as the cumulative impact of astronomy development on the spiritual landscape of Mauna Kea and the traditional function of this sacred space. An assessment of this impact cannot be done effectively without the following:
 - a. Discussion on the Wai Kapu A Kane
 - b. Discussion on human/land connections and importance in today's world
3. Does the proposed TMT development constitute **DESECRATION** as defined by HRS 711-1107?
And if so, would the issuance of a CDUP by the DLNR make them a party to said desecration?

I Joseph Kualii Lindsey Camara find that these issues are critical to determining whether the proposed TMT development is legal, moral and just. The denial of these issues to be brought forth in this case would be a denial of my due process rights.

Joseph Kualii Lindsey Camara
kualiic@hotmail.com

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
Document title:

I.

II. 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
DLNR.maunakea@hawaii.gov
*Custodian of the Records
(original + digital copy)*

Judge Riki May Amano (Ret.)
rma3cc@yahoo.com
Hearing Officer

III. Julie China, Deputy Attorney
General
julie.h.china@hawaii.gov
*Counsel for the Board of Land and
Natural Resources*

Carlsmith Ball LLP
isandison@carlsmith.com
*Counsel for the applicant University of
Hawaii 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*

(1)

Watanabe Ing LLP
rshinyama@wik.com
douging@wik.com
*Counsel for TMT International
Observatory, LLC*

Harry Fergerstrom
hankhawaiian@yahoo.com

Richard L DeLeon
kekaukike@msn.com

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
lisa@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

Joseph K. L. Camara _____ Hilo, Hawaii _____