

FLORES-CASE 'OHANA
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Petitioners pro se

BOARD OF LAND AND NATURAL RESOURCES
STATE OF HAWAII

In the Matter of:)	Case No. BLNR-CC-16-002
A Contested Case Hearing Re)	
Conservation District Use Application)	FLORES-CASE 'OHANA'S MOTION TO
(CDUA) HA-3568 for the Thirty Meter)	ADMIT FIRST SUPPLEMENTAL
Telescope at the Mauna Kea Science)	EXHIBITS INTO EVIDENCE;
Reserve, Ka'ohē, Hamakua District,)	MEMORANDUM IN SUPPORT OF
Island of Hawai'i, TMK (3) 4-4-015:009)	MOTION; CERTIFICATE OF SERVICE
)	
)	Hearing Officer: Hon. Riki May Amano (ret.)

**FLORES-CASE 'OHANA'S MOTION TO ADMIT
FIRST SUPPLEMENTAL EXHIBITS INTO EVIDENCE**

Petitioner, E. KALANI FLORES, pro se, representing the FLORES-CASE 'OHANA, respectfully submits this Motion to Admit First Supplemental Exhibits Into Evidence ("Motion"). This motion is made pursuant to Hawai'i Administrative Rules ("HAR") §§ 13-1-32, 34, and 35.

DATED: Pu'ukapu, Hawai'i, March 8, 2017



E. Kalani Flores
Representing Flores-Case 'Ohana

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Island of Hawai'i, TMK (3) 4-4-015:009)	
)	

MEMORANDUM IN SUPPORT OF MOTION

The FLORES-CASE 'OHANA previously submitted a motion on February 28, 2017 to admit into evidence the written direct testimony of its witnesses as well as exhibits. The FLORES-CASE 'OHANA now moves to admit into evidence the following additional exhibits as part of its first supplemental. Pursuant to Hawai'i Revised Statutes § 91-10 governing the admissibility of evidence in agency proceedings, the FLORES-CASE 'OHANA moves to admit into the record the following documentary evidence:

Exhibit No.	Description	Rec'd Into Evidence
B.14	Pualani Kanahele transcript	
B.26	Hawaii County General Plan 2005	
B.27	Webpage	
B.81a	OMKM Hawaiian Culture	
B.81b	OMKM Historic Properties	
B.81c	OMKM CMP Policies	
B.81d	OMKM CMP	
B.81e	OMKM MKSR Master Plan	
B.82a	Hawaiian Protocol	
B.82b	Our Sacred Mountain	
B.83	Imiloa – Cultural Significance	
B.84	Astronomy Workforce Report	
B.85a	HIEDB board	

B.85b	HIEDB 2008 990	
B.85c	HIEDB 2009 990	
B.85d	HIEDB 2010 990	
B.85e	HIEDB 2012 990	
B.86a	TMT 2010 990	
B.86b	TMT 2011 990	
B.86c	TMT 2012 990	
B.86d	TMT 2013 990	
B.79	EISPN – New Master Leases for MKSR	

The FLORES-CASE ‘OHANA moves to admit into the record the following documentary evidence based upon the assigned numbers in the Evidentiary Hearing Submittals:

Exhibit No.	Description	Rec’d Into Evidence
B.37	MKSR Master Plan (2000)	
B.38	MKSR Master Plan Appendix (2000)	
B.39	Mauna Kea CMP (Jan 2009)	
B.40	CRMP – CMP Sub-Plan (2009)	
B.41	NRMP – CMP Sub-Plan (2009)	
B.42	Public Access Plan – CMP Sub-Plan (2010)	
B.43	Decommissioning Plan – CMP Sub-Plan (2010)	

Based on the foregoing, the FLORES-CASE ‘OHANA respectfully requests that the Hearing Officer grant this Motion.

DATED: Pu‘ukapu, Hawai‘i, March 8, 2017



E. Kalani Flores
Representing Flores-Case ‘Ohana

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, Hāmākua,
Hawai'i, TMK (3) 4-4-015:009

BLNR Contested Case HA-16-002

Document title: FLORES-CASE 'OHANA'S MOTION TO
ADMIT FIRST SUPPLEMENTAL EXHIBITS INTO
EVIDENCE; MEMORANDUM IN SUPPORT OF
MOTION; CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above referenced documents were served upon the following parties by the means indicated below:

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Date: March 8,, 2017