

ELIZABETH J. RAGO

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BOARD OF LAND AND NATURAL RESOURCES

STATE OF HAWAII

IN THE MATTER OF

A Contested Case Hearing Re Final Habitat Conservation Plan and Incidental Take License for the Na Pua Makani Wind Energy Project by Applicant Na Pua Makani Power Partners, LLC; Tax Map Key Nos. (1) 5-6-008:006 and (1) 5-6-006:018, Koolauloa District, Island of O'ahu, Hawai'i.

Case No. BLNR-CC-17-001

ELIZABETH J. RAGO'S WITNESS LIST
RESPONSIVE BRIEF; CERTIFICATE OF
SERVICE

ELIZABETH J. RAGO'S RESPONSIVE BRIEF

Elizabeth J. Rago respectfully requests the denial of proposed Final Habitat Conservation Plan and Incidental Take License for the Na Pua Makani Power Partners, LLC Wind Energy Project in Kahuku on the North Shore of O'ahu, Hawai'i because it violates Hawai'i Revised Statutes § 195D. The Applicant, Na Pua Makani, has failed to meet its burden in its Opening Brief.

DATED: Honolulu, Hawai'i, July 17, 2017.



ELIZABETH J. RAGO

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006:018, Koolauloa District, Island of O‘ahu,
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CERTIFICATE OF SERVICE

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The undersigned hereby certifies that a copy of ELIZABETH J. RAGO’s Responsive Brief was duly
served upon the following parties, by Hand Delivery, U.S. Mail, postage prepaid, or electronically, on
July 17, 2017, at the addresses below:

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DATED: Honolulu, Hawai‘i, July 17, 2017.

A handwritten signature in dark ink, featuring a stylized 'E' and 'R' followed by a long horizontal stroke.

ELIZABETH J. RAGO