

August 24, 2018

VIA E-FILING

Ryan Vancil, Deputy Hearing Examiner
Office of Hearing Examiner
P.O. Box 94729
Seattle, WA. 98125

Re: Appeal of Elizabeth Campbell, et al, W-18-002/W-18-003
Declaration of Elizabeth Campbell

Dear Examiner Vancil:

I, Elizabeth Campbell, declare as follows:

That I am over the age of 18 years, a party herein, and competent to be a witness herein;

This letter accompanies a motion for continuance that I am submitting in order to extend the discovery cutoff time in this matter from August 24, 2018 to September 14, 2018, an approximate period of three weeks. The request comes at this late date because certain information has only very recently become available which will possibly affect the outcome in this matter and most certainly has implications for the efficient use of limited administrative review resources.

On Thursday of last week, August 16th I received a phone call from an informed source with comprehensive knowledge of the matter herein. The phone call was to alert me of two things. One, that the Talaris property that is an integral and critical part of the City's Alternatives #2 and #3 in the FEIS is now under a binding real estate contract; it previously was only reported in the news as being part of a potential real estate sale. And two, that there have been meetings between the City of Seattle, the Mayor's office, Office of Housing, Parks Department and a group of local individuals working to negotiate the identification and designation of an alternative location to the Talaris site in Seattle for the homeless and affordable housing projects; that was proposed to be built at the Fort Lawton Army Reserve Center property ("FLARC") (Alternative #2), or at the Talaris site (Alternative #3).

The goal of these heretofore unknown efforts is to facilitate the City's adoption of Alternative #3, the use of the FLARC property for purely park and recreational purposes and the offsite location of the homeless and affordable housing.

According to my informant, whom I consider highly knowledgeable and very reliable, based on their first hand knowledge, a real estate contract to purchase the Talaris site has been signed, that materially affects the viability of Alternatives #2 and #3. There are multiple alternative sites now being considered by the City for the proposed homeless and affordable housing development under Alternative #3. I was told there is such confidence in the success of this endeavor to remove the development of housing at the FLARC site that one portion of the negotiating parties, the Friends of Discovery Park ("FoDP") core leadership and assorted colleagues of theirs, have gone so far as to hire a landscape architect to develop their vision for the use of the FLARC property as part of the package deal that is being worked out.

Based on my own many years of knowledge and insight related to the FoDP, Discovery Park, and the Seattle Parks and Recreation Department (Seattle Parks District), another party in this matter before the hearing examiner, I believe that such a scenario is highly likely because FoDP has such a deep and enduring relationship with Parks personnel and leaders, in fact Parks for now decades and regularly

defers to all manner of schemes put forward by the FoDP's leaders. Their commitment to engage and fund an all out design of the FLARC property post BRAC proceedings speaks volumes in my mind.

Since the phone call I have endeavored to confirm the information received through regular channels and without benefit of a legally compelling authority that would induce more prompt, transparent, and complete responses to my inquiries. I have only been able to verbally ascertain three aspects of the information I have received, that the City has been involved in communications with the FoDP leadership and others about alternative, off-site affordable and homeless housing options, the engagement of the landscape architect, and that there have been actual submittals to the City of alternative housing development locations for their consideration.

I am requesting the extension of discovery time in order to obtain certifiable evidence that the information I have been given is accurate, and if accurate to be able to collect that evidence and submit this important information to the hearing examiner with the argument that it has implications for this matter on a number of fronts, including if there has been such a City-led material change to the direction or nature of the City's project alternatives it may very well moot, rearrange, or otherwise negate the proceedings herein.

The absolute elimination of the Talaris site as an alternative is a material development in this matter, and discovery to establish that fact is necessary to ensure a full review and adjudication of the proceedings herein. If the balance of the information regarding the negotiations is also accurate then that would realistically affect the advisability of taking up the Office of Hearing Examiner's resources, the hearing examiner's time with the proceedings herein, time and resources which could be better spent on other pending cases. Administrative/judicial economy is an important factor to keep in mind.

I understand that the change requested would shift the rest of the hearing schedule accordingly, however, there was no way to anticipate that the events in question were taking place, that they were and are occurring. Realistically with the agreement of the other party to this matter, the City of Seattle, rather than the hearing in this matter starting on September 25, 2018, it is requested that it be scheduled to start on the hearing examiner's next available hearing date, and working backwards from that date that the submittal of witness and exhibit lists be scheduled accordingly and consistent with that hearing date.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

EXECUTED at Seattle, Washington on this 24th day of August, 2018.

Sincerely Yours,



Elizabeth A. Campbell,
Declarant/Appellant

Cc: (via email)
City of Seattle
Patrick Downs
Patrick.downs@seattle.gov

Alicia Reise
Alicia.reise@seattle.gov