

RESPONSE TO MOTION TO DISMISS

Citizens Advisory Committee members Patrick Angus, Maja Hadlock, J. Elliott Smith, and Dean Paton, and former Citizens Advisory Committee member Nicholas Richter respond to the Motion to Dismiss certain issues as follows:

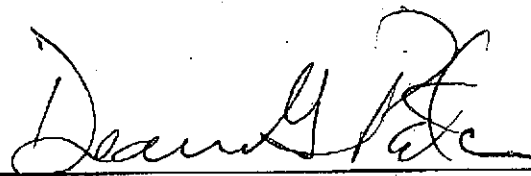
The Appellants ask that the Motion be denied in entirety.

In regards to the Appeal of the members of the Citizens Advisory Committee, the Motion does not ask that our entire appeal be dismissed but argues that five sub-paragraphs be dismissed.

However, those five subparagraphs in our Appeal constitute specific examples which are included among those environmental impacts for which the Environmental Impact Statement fails to provide adequate analysis. Those examples were included in order to give notice as to the issues for which we believe more information and analysis is required by the Land Use Code and Environmental Policy Act.

In order for the Citizens Advisory Committee and the Director of the Department of Planning and Development to reach informed recommendations, as required by law, the Environmental Impact Statement must be supplemented as will be shown at the Hearing.

We remain committed to examining a proposed Major Institution Master Plan of the Applicants according to the standards established by law, but we respectfully ask that the Hearing Examiner order the completion of an Environmental Impact Statement that investigates and analyzes reasonable alternatives.



Dean Paton for the members of the Citizens Advisory Committee named

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DEAN G. PATON

F A X C O V E R

Date:	May 15, 2015
Send to:	Office of the Hearing Examiner
Attention:	Tiffany Ku
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From:	Dean Paton
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☐ URGENT

☐ REPLY ASAP

☐ PLEASE COMMENT

☐ PLEASE REVIEW

☐ FOR YOUR INFORMATION

TOTAL PAGES, INCLUDING COVER: 2

Comments:

Dear Ms. Ku -

Please find my response to the Motion to Dismiss on the second page of this fax transmission.

Thank you,
Dean Paton



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