

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

9	THE CITY OF TACOMA,)	
10)	NO. 08-2-04025-4
11	Plaintiff)	
12	v.)	DECLARATION OF JOHN LOVELACE IN
13	NORTHSHORE GOLF ASSOCIATES, INC.,)	SUPPORT OF SAVE NE TACOMA'S
14	a Washington limited liability company; and)	MOTION TO INTERVENE
15	HERITAGE SAVINGS BANK, a Washington)	
16	corporation)	
	Defendants.)	

John Lovelace declares under the penalty of perjury under the laws of the state of Washington as follows:

1. I am over the age of eighteen and competent to testify. I make this declaration from personal knowledge and upon information and belief.
2. I am the owner of a parcel of residential property in Pierce County, the street address of which is: 3513 North Shore Blvd NE, Tacoma, WA 98422. My home is adjacent to the North Shore Golf Course ("Golf Course"). When I purchased my home in January,

DECLARATION OF JOHN LOVELACE IN
SUPPORT OF SAVE NE TACOMA'S
MOTION TO INTERVENE - 1

#657462 v1 / 35091-001

1 1991, I paid a “premium” to acquire a house located next to a golf course. I have been a
2 member of the semi-private North Shore Golf Course since 1980. I play the course regularly.

3
4 3. I am the president of Save NE Tacoma. Save NE Tacoma is a Washington
5 non-profit corporation under the Washington Charitable Solicitation Act. Save NE Tacoma is
6 comprised of constituent members, many of whom own residential homes adjacent or in close
7 proximity to the Golf Course in the North Shore Country Club Estates.

8
9 4. Save NE Tacoma is a coalition of residents from NE Tacoma, Browns Point,
10 Dash Point, Federal Way and nearby neighborhoods who have joined together to oppose the
11 proposed conversion of the Golf Course into a development of 860 low to moderate priced
12 houses, multiplexes and town homes. At the present time, there are more than 2,200
13 constituent members of Save NE Tacoma.

14
15 5. If the conversion of the Golf Course proceeds, the impacts to Save NE
16 Tacoma’s constituent members will be many and will be severe. The negative impacts will
17 range from financial to aesthetic.

18
19 6. Among the negative financial impacts that will occur will be the devaluation of
20 our homes in the absence of an adjacent golf course. I estimate that removal of the Golf
21 Course will result in at least a 20% reduction in the value of my property.

22
23 7. The negative aesthetic impacts and injury to the quality-of-life impacts will be
24 no less severe—and will include disruption of elementary and middle schools with redrawn
25 boundaries, increased local traffic and higher crime. The transportation infrastructure of the
26 area is already at its limit. The addition of 860 new dwellings in the area will result in
27

28
DECLARATION OF JOHN LOVELACE IN
SUPPORT OF SAVE NE TACOMA’S
MOTION TO INTERVENE - 2

#657462 v1 / 35091-001

Law Offices
KARR TUTTLE CAMPBELL

A Professional Service Corporation

1201 Third Avenue, Suite 2900, Seattle, Washington 98101-3028
Telephone (206) 223-1313, Facsimile (206) 682-7100

1 increased response times for police, fire, ambulance and other emergency responders. Other
2 negative aesthetic impacts will include loss or reduction of views, loss of NE Tacoma's last
3 recreational open space, damage to the critical head waters of Joe's Creek, and the
4 irreplaceable loss of mature trees and other habitat which will negatively affect the area's
5 carbon footprint. Save NE Tacoma believes that the proposed conversion from open space to
6 dense housing violates the Tacoma Comprehensive Plan and Tacoma Municipal Code as well
7 as several legal contracts and environmental laws.
8

9
10 8. While the City of Tacoma and Save NE Tacoma share many of the same
11 positions in this litigation, there are substantial differences in interest. First among these
12 differences is the fact that the City of Tacoma does not have the same economic interest in the
13 litigation as Save NE Tacoma's constituent members.
14

15 9. Save NE Tacoma's participation in this litigation is necessary because its
16 constituent members will be the ones most directly affected by the litigation. Participation as
17 a party-plaintiff is necessary to insure that Save NE Tacoma's unique positions and concerns
18 are brought before the court.
19

20 DATED this _____ day of February, 2008, at _____, Washington.

21
22
23 _____
John Lovelace
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DECLARATION OF JOHN LOVELACE IN
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MOTION TO INTERVENE - 3

#657462 v1 / 35091-001

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