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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In the Matter of the Appeals of  
WALLINGFORD COMMUNITY  
COUNCIL, ET AL.  
  
Of Adequacy of FEIS Issued by the  
Director, Office of Planning and  
Community Development

Hearing Examiner File:  
W-17-006 through  
W-17-014  
  
FINAL WITNESS AND EXHIBIT LIST OF  
JUNCTION NEIGHBORHOOD ORGANIZATION

TO: Respondent City of Seattle and to its Seattle Office of Planning and Community  
Development (“OPCD”) and its Attorneys  
  
AND TO: All Appellants' attorneys and Authorized Representatives listed on the Certificate of  
Service attached hereto as Exhibit A.

Pursuant to the Second Prehearing Order, Appellant Junction Neighborhood Organization  
 (“JuNO”) submits its Final Witness and Exhibit List.

1 **I. RESERVATION OF RIGHTS**

2 Appellant reserves the right (a) to call any witness identified by any party, including any other  
3 appellant, (b) to use any of the documents and/or exhibits identified by any other party, including any  
4 other appellant, (c) to call substitute witnesses if any identified witness becomes unavailable, (d) to  
5 call rebuttal witnesses, and (e) to call additional witnesses as allowed by Seattle Hearing Examiner  
6 Rules

7 **Time Estimates.** The approximate time period for each witness's direct testimony does not  
8 include time to authenticate documents, arguments about the admissibility of documents if the  
9 Respondent will not stipulate to admission of the document(s), nor time for cross examination and re-  
10 direct testimony.

11 **II. WITNESS LIST**

12 1. Janine Rees. Ms. Rees is a resident of West Seattle, a member of the JuNO Land Use  
13 Committee (“JLUC”). If called, Ms. Rees would provide fact testimony regarding the FEIS analysis  
14 of emergency services, sewer, and West Seattle Junction conditions with respect thereto. Estimated  
15 Time: 60 minutes.

16 2. Carl Guess. Carl Guess is a West Seattle resident and a member of JLUC. If called,  
17 Mr. Guess would provide fact testimony with respect to Parks and Open Space and Biological  
18 Diversity issues addressed in the FEIS. Estimated Time: 60 minutes.

19 3. Christy Tobin-Presser. Ms. Tobin-Presser is a West Seattle resident and a member of  
20 JLUC. If called, Ms. Tobin-Presser would provide fact testimony with respect to the adequacy of the  
21 proposed action alternatives, the Seattle Comprehensive Plan and similar context, and the Junction  
22 neighborhood plan. Estimated Time: 90 minutes.



1	013	Cultural Element from Comp Plan
	014	Photo Campbell Building
2	015	Photo Hamm Building
	016	Farmer's Market Flyer
3	017	Hi-Yu Festival web page
	018	Holidays at the Junction web page
4	019	Junction Ballroom Dancing web page
	020	Junction Car Show web page
5	021	Junction History web page
	022	Junction Spring Fling web page
6	023	Campbell Building landmark nomination
	024	Hamm Building landmark nomination
7	025	Mural photo
	026	Mural photo
	027	Mural photo
8	028	Mural photo
	029	Mural photo
9	030	Mural photo
	031	Mural photo
10	032	Seattle Ordinance 125486
	033	Seattle Ordinance 125522
11	034	Mural photos
	035	West Seattle Grand Parade web page
12	036	Summer Fest flyer
	037	FEIS Exhibit 3--FEIS Exhibit 3--7.1: "2017 Parks & Open Space Plan Citywide LOS Standard"
13	038	FEIS Section 3.7.4: "Significant Unavoidable Adverse Impacts"
14	039	FEIS Exhibit 3.7--FEIS Exhibit 3.7--4: "LOS Evaluation of Alternatives"
	040	Blog Entry --Blog Entry -- City Of Seattle Web Site
15	041	FEIS Section 3.7.3: "Mitigation Measures"
	042	FEIS Exhibit 3.7--FEIS Exhibit 3.7--3: "Baseline Conditions for Parks and Open Space Provision and Distribution"
16	043	FEIS Exhibit 3.7--FEIS Exhibit 3.7--5: "Comparison of Parks and Open Space Availability Across Alternatives"
17	044	Independent analysis of Seattle assessed property values
18	045	Page 19, "2018 Economic & Revenue Forecast" --Page 19, "2018 Economic & Revenue Forecast" -- King County
	046	Page 51 - "Seattle 2035 Comprehensive Plan"
19	047	Select statements relating to walkability
20	048	Independent compilation of SFR parcels in West Seattle Junction Urban Village to be upzoned under MHA alternatives
21	049	Totals of SFR parcels in West Seattle Junction Urban Village to be upzoned under MHA alternatives
22	050	Page 38, Seattle Urban Forest Stewardship Plan
	051	Page 39, Seattle Urban Forest Stewardship Plan
23	052	FEIS Page 3.319

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1	053	City of Seattle Executive Order 2017--City of Seattle Executive Order 2017-- -11 : "Tree Protection"
2	054	Page 10, 2016 Seattle Tree Canopy Assessment: "What is the Relationship Between Tree Canopy and Environmental Equity?"
3	055	FEIS Page 3.328
4	056	FEIS Page 3.334
	057	FEIS Page 3.338
5	058	Independent analysis of tree canopy in West Seattle Junction Urban Village Parcel--Parcel--level data extraction: West Seattle Junction Urban Village - Alternative 2
6	059	Parcel--Parcel--level data extraction: West Seattle Junction Urban Village - Alternative 3
7	060	Parcel--Parcel--level data extraction: West Seattle Junction Urban Village - Alternative 3
8	061	Parcel--Parcel--level data extraction: West Seattle Junction Urban Village - Preferred Alternative
9	062	FEIS Exhibit 3.6--FEIS Exhibit 3.6--5
	063	FEIS Exhibit 3.6--FEIS Exhibit 3.6--11
	064	FEIS Exhibit 3.6--FEIS Exhibit 3.6--15
	065	FEIS Page 3.319
10	066	Page 38, Seattle Urban Forest Stewardship Plan
	067	JuNO Letter to Sam Assefa 3/9/2017
11	068	JuNO Proposed Amendment
	069	JuNO Analysis of MHA Feedback
12	070	Community Planning Element from Comp Plan
	071	Planning flowchart from Comp Plan
13	072	Glossary excerpt from Comp Plan
	073	Proposal Summary from Comp Plan 2035 EIS
14	074	Urban Village Strategy summary from Comp Plan
	075	Urban Village Strategy definition from Comp Plan
15	076	West Seattle Junction Neighborhood Plan from Comp Plan
	077	Photo of SDOT traffic sign taken 11/21/2017 at 0813
16	078	Photo of SDOT traffic sign taken 11/30/2017 at 0751
	079	Google Map query, 0745 on 4/18/2018
17	080	Google Map query, 0745 on 4/18/2018
	081	Google Map query, 0800 on 4/18/2018
	082	Google Map query, 0800 on 4/18/2018
18	083	Google Map query, 0800 on 4/18/2018
	084	Google Map query, 0815 on 4/18/2018
19	085	Google Map query, 0815 on 4/18/2018
	086	Google Map query, 0815 on 4/18/2018
20	087	SDOT traffic map, 0815 on 4/18/2018
	088	Google Map query, 0830 on 4/18/2018
21	089	Google Map query, 0830 on 4/18/2018
	090	Google Map query, 0830 on 4/18/2018
22	091	SDOT traffic map, 0830 on 4/18/2018
	092	Google Map query, internal to junction UV, 0830 on 4/18/2018
23	093	Google Map query, internal to junction UV, 0830 on 4/18/2018

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1	094	Google Map query, internal to junction UV, 0830 on 4/18/2018
	095	Google Map query, internal to junction UV, 0830 on 4/18/2018
2	096	Google Map query, internal to junction UV, 0830 on 4/18/2018
	097	Google Map query, 0845 on 4/18/2018
3	098	Google Map query, 0845 on 4/18/2018
	099	Google Map query, 0845 on 4/18/2018
4	100	SDOT traffic map, 0845 on 4/18/2018
	101	WS Blog traffic page on 4/18/2018
5	102	WS Bridge entrance traffic extract and graph
	103	Busiest streets in Seattle traffic extract
6	104	Zoning map extract of Edmunds St
	105	Zoning map extract of Edmunds St
7	106	Busiest intersections in Seattle traffic extract
	107	SDOT single line traffic study - traffic data source
	108	SMC 23.52.015 excerpt
8	109	Seattle Streets Illustrated WS Junction map
	110	Terminal 5 EIS LOS Evaluation
9	111	Terminal 5 EIS LOS Standards
	112	WS Junction Zoning Map
10	113	JuNO comments on DEIS
	114	List of noncompliant responses
11	115	<< Not used >>
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20	134	Seattle Police Budget 2014-2018
	135	Berkshire Report of Seattle Police staffing needs, March 2016
21	136	Seattle Fire response report
	137	Seattle Fire Dept budget report
22	138	SPU Wastewater plan 2006
	139	12-inch sewer map, Seattle
23	140	GIS data, sewer, Junction
	141	SPU handout for future draining plan

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1	142	Seattle 2017 Parks plan
	143	Seattle 2035 Comprehensive Plan 2016
2	144	Seattle 2035 Comprehensive Plan 2017
	145	Seattle 2035 Comprehensive Plan EIS
3	146	Seattle Streets Illustrated
	147	University district EIS
4	148	MHA FEIS
	149	MHA FEIS Appendices
5	150	Alaskan Way Viaduct EIS Appendix C - Transportation
	151	Seattle Times Article - 1/7/2018 - "If You Think Seattle Traffic is Bad Now, Just Wait Until These Projects Start"
6	152	Council Connection article concerning Legacy Business program

7 Exhibits are available at:

8 <https://drive.google.com/open?id=1kx5JpMKLacfm8QCkLCGuH9jcNuk-nQLY>

9  
10 **EXHIBIT A: DECLARATION OF SERVICE**

11 Richard Koehler declares:

12 That on the 12<sup>th</sup> day of June, 2018, I filed with the Hearing Examiner and delivered by email  
13 as allowed by the Second Pre-hearing Order of February 16, 2018, Appellant's Final Witness and  
14 Exhibit List to the City of Seattle and to counsel for the City of Seattle at the following email  
15 addresses:

- 16 1. Geoffrey Wentlandt at [Geoffrey.wentlandt@seattle.gov](mailto:Geoffrey.wentlandt@seattle.gov)  
17 2. MHA@seattle.gov  
18 3. Jeff Weber at [jeff.weber@seattle.gov](mailto:jeff.weber@seattle.gov)  
19 4. Daniel B. Mitchell at [daniel.mitchell@seattle.gov](mailto:daniel.mitchell@seattle.gov)  
20 5. Alicia Reise at [alicia.reise@seattle.gov](mailto:alicia.reise@seattle.gov) (courtesy copy)  
21 6. Tadas A. Kisielius at [tak@vnf.com](mailto:tak@vnf.com)  
22 7. Dale Johnson at [dnj@vnf.com](mailto:dnj@vnf.com)  
23 8. Clara Park at [cpark@vnf.com](mailto:cpark@vnf.com)

1 9. Cara Tomlinson ctomlinson@vnf.com (courtesy copy)

2 Copies were sent to co-appellants at the following email addresses:

- 3 1. Wallingford Community Council (W-17-006): Lee Raaen at [lee@lraaen.com](mailto:lee@lraaen.com)
- 4 2. Morgan Community Association (W-17-007): Deb Barker at [djb124@earthlink.net](mailto:djb124@earthlink.net)
- 5 3. Friends of Ravenna Cowen (W-17-008): Judith Bendich at [jebendich@comcast.net](mailto:jebendich@comcast.net)
- 6 4. Fremont Community Council: Toby Thaler at [toby@louloup.net](mailto:toby@louloup.net)
- 7 5. Seattle Coalition for Affordability, Livability, and Equity (W-17-010): Claudia Newman at
- 8 [newman@bnd-law.com](mailto:newman@bnd-law.com)
- 9 6. Seniors United for Neighborhoods (W-17-011): David Ward at
- 10 [booksgalore22@gmail.com](mailto:booksgalore22@gmail.com)
- 11 7. Beacon Hill Council (W-17-012): Mira Latoszek at [mira.latoszek@gmail.com](mailto:mira.latoszek@gmail.com)
- 12 8. Friends of North Rainier Neighborhood Plan (W-17-013): Marla Steinhoff
- 13 [masteinhoff@gmail.com](mailto:masteinhoff@gmail.com);

14 I declare under penalty of perjury under the laws of the state of Washington that the foregoing

15 information is true and correct.

16 DATED this 11<sup>th</sup> day of June, 2018, at Seattle, Washington.

17 \_\_\_\_\_/s/

18 Richard Koehler

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20 Seattle WA, 98136

21 206 851-5256

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