

1 Park. Migratory birds, such as western tanagers, return year-after-year to the same trees. Some
2 species, such as the red-breasted sapsucker, depend on older trees. Pileated woodpeckers require
3 250 acres of mature forest. The species he described inhabit Ravenna Park, but also are found north
4 of the park in the proposed upzone area. He described the creation of "habitat islands" or a "postage-
5 stamp effect." When canopy and groundcover are reduced, this creates islands where previously
6 there were corridors. The "habit islands" inevitably begin to lose their bird species," citing *The*
7 *Cornell Lab of Ornithology Handbook of Bird Biology*. Mr. Wheeler described this neighborhood
8 corridor as "connectivity." "Those big trees [in the proposed RUV expansion area] are a stepping
9 stone from Ravenna Park, and they help maintain the habitat of that park to eliminate that postage
10 stamp effect I was talking about earlier where you have connectivity from neighborhood trees to
11 park trees." Mr. Wheeler actually tested this thesis. He conducted bird counts radiating out from
12 Ravenna Park, and as the number of trees, shrubs and ground cover decreased, so did the number of
13 species.
14

15
16 His presentation also shows the loss of tree canopy in the RUV. One photo shows the
17 exceedingly small size of a newly-planted street tree, surrounded by concrete, in front of the new
18 Mio apartments, and the next page looks south into the Cowen neighborhood where a large stand of
19 mature trees still remains, not yet subject to proposed upzoning.
20

21 Mr. Wheeler had several critiques of §3.6, but his major disagreement was with the
22 conclusion that there would be no significant unavoidable adverse impacts. "Even accepting those
23 numbers [the FEIS tree loss calculation], that's too much. I think that's a setback and would be
24 devastating not only for the neighborhood, but a setback for the urban forest stewardship."
25
26

1 On cross-examination, Mr. Mitchell asked whether the presentation indicated the number of
2 street trees [of the 425 counted]. Mr. Wheeler said he did not break out the number of street trees.¹⁴

3 B. The Testimony By the City's Witness, Mike Leach, Together With the City's Exhibits,
4 and Mr. Wheeler's Tree/Shrub Count Data, Confirm The City's Tree Canopy Calculation Is
5 Inadequate, Includes Irrelevant Data That Should Not Be Included in the Calculation,
6 Minimize s the True Amount of Tree Loss On Parcels , and Obfuscates the Impacts by
7 Aggregating Data, Thus Providing No Information to Decision-Makers As to Actual Tree
8 Loss and Neighborhood Impacts.

9 The City called Michael Leach to testify about LIDAR and Tree Canopy Analysis
10 Summaries in §3.6 of the FEIS.¹⁵ Mr. Leach stated the analysis was based on a LIDAR-based
11 canopy cover assessment for the city of Seattle. The City contracted the analysis to the University of
12 Vermont Spatial Analysis Lab, Jarlath O'Neill-Dunne, Director. See Exs. 214 and 215. The proposal
13 includes "deliverables" for 2106 canopy metrics which include 13 sub-categories, including "SDOT
14 rights-of-way" (Ex. 215, p. 21, 3-b) and "neighborhoods" (*id.*, 3-f). The proposal states, the
15 "minimum height for detectable trees will be set at 8 feet..." (*Id.*, p. 4.)

16 Mr. Leach testified the lab used a 2016 "leaf off" LIDAR provided by the City, which "tends
17 to underestimate tree canopy," and other native data from the U.S.D.A from 2015 would be
18 combined with it. The resulting canopy cover from the lab was then overlaid on the area for four
19 broad zones - High Displacement Risk & High Access to Opportunity,¹⁶ High Displacement Risk &

20 _____
21 ¹⁴ This same issue, including street trees in the parcel data, is relevant to the deficiency of the City's analysis of
22 "Tree Cover," discussed *infra*. Multiple witnesses explained how and why §3.6 is inadequate re tree loss: No established baseline
23 from which to measure tree loss; challenge as to the to the insufficiency of the calculation used to determine tree loss (Carl Guess); the
24 inaccuracy of LIDAR when used to calculate tree loss per lot (Jeffrey Richardson and others), reference in the FEIS to the Seattle Tree
25 Ordinance without explaining that the ordinance permits removal of exceptional trees for new construction, SMC11.060, .070 and .080,
26 removal of street trees for utility work or if these might be damaged by a new development (Nolan Rundquist), and the tree ordinance
does not require replacement of "hazardous" trees. The testimony also noted SDCL's failure to enforce the ordinances. (Steve Zemke,
Michael Oxman) This testimony is not repeated here, but Friends of Ravenna-Cowen incorporates by reference their evidence and
closing arguments.

¹⁵ Ex. 2, section 3.6, p. 3.329, Exs. 3.6-5 and 3.6-6 (Alternative 2); p. 3.325, Exs. 3.6-11 and 3.6-12, (Alt. 3);
and p.3.339, Exs. 3.6-15 and 3.6-16 (Preferred Alt.)

¹⁶ Columbia City, Lake City, Northgate, First-Hill Capitol Hill, N. Beacon Hill, North Rainier, and 23rd &
Union- Jackson. [From MHA FEIS, Ex. 2, p. 2.26]

1 Low Access to Opportunity,¹⁷ Low Displacement Risk & High Access to Opportunity,¹⁸ and Low
2 Displacement Risk & Low Access to Opportunity,¹⁹ but not overlaid on each urban village and
3 expansion area. Then, that tree canopy cover was used to calculate the "average" percent tree cover
4 for each zoning designations (LR, MR/HR, NC/C, RSL, and SF). This was then overlaid "with GIS
5 data layers representing the various alternatives, the "zone changes," *i.e.*, from SF to RSL, SF to LR,
6 RSL to LR, *etc.* And the change in tree cover was then calculated. Mr. Leach testified, as is stated in
7 the FEIS and on the charts, "green space" was not included in the total canopy in each zone,
8 meaning, "parks, cemeteries, public and private schools." The FEIS states, p. 3.318, the "green
9 spaces were evaluated separately, as tree canopy in these areas are unlikely to change, regardless of
10 zoning changes."
11

12
13 On cross examination, Mr. Leach explained that ESA did not directly contract with the lab,
14 the City did, and the City set the parameters. The City provided "the data product" to ESA.
15 Mr. Thaler asked whether the lab performed an accuracy check. He said, no, because this was not
16 requested by the City because it adds to the cost. Mr. Thaler then asked whether street trees were
17 included in the total toward the tree canopy cover. Mr. Leach said, "[W]e included the right-of-way
18 trees within the designations as part of our analysis."²⁰ Mr. Leach agreed the right-of-way tree
19 inclusion is not explicitly set out in the FEIS. Mr. Thaler asked, "Wouldn't this skew the data? Mr.
20 Leach didn't answer the question. He just repeated, "We included the right-of-way trees in the
21
22

23
24 ¹⁷ Rainier Beach, Othello, Westwood-Highland Park, South Park, Bitter Lake. *Id.*

25 ¹⁸ Green Lake, Roosevelt, Wallingford, Upper Queen Anne, Fremont, Ballard, Madison-Miller, Greenwood-
26 Phinney Ridge, Eastlake, West Seattle Junction, Admiral, Crown Hill and Ravenna (in the University Community Urban
Center). *Id.*

¹⁹ Aurora-Licton Springs and Morgan Junction. *Id.*

²⁰ Street trees in public right-of-ways, which will not decrease or be impacted due to upzoning, are counted in
the tree canopy cover, whereas "green space," parks, cemeteries, public and private schools are not.

1 calculation...within each zoning designation."²¹ When Mr. Thaler asked who decided to include
2 street trees, Mr. Leach said "Geoff [Wendtland] or Sharese [Graham]."

3 Mr. Leach also said no analysis was done for the areas outside urban villages, but which are
4 part of the "project area." "To my knowledge we didn't do an evaluation of those areas..." Mr.
5 Thaler also asked, "Didn't you have the data to do show the tree canopy urban village-by-urban
6 village?" Mr. Leach said, "Yes, those calculations could be made."

7
8 On cross-examination by Appellant's counsel, Mr. Leach testified that the height set for tree
9 identification was 12-feet (even though the lab states it is 8 feet, Ex. 215, p.4). He agreed that any
10 shrub over the threshold would be included as a tree. He was asked, regardless of the height, doesn't
11 the Tree Analysis Summary in the MHA FEIS actually include shrubs. He said it did.²² He said that
12 it would be preferable to have some ground assessment to make sure that only trees were included,
13 even sampling, but the decision not to do so was an economic decision.

14 He was asked to look at p. 3.318, which explains "green space" was treated separately and
15 not included in tree canopy.

16 Bendich: Well, if you deleted out all the green space here, shouldn't you have equally taken out the green
17 space that's attributable to the right of way trees?

18 Leach: It's something that could have been done. But we, our team made a decision to include those areas as
19 part of the zoning designation.

20 Q.: But since those don't change, you're looking at data that don't change with data that does change, how can
21 you evaluate it without taking out that data?

22 A: It was our team's decision to include those areas within the zoning the zoning designation.

23 Mr. Leach never answered the question. At this point Mr. Leach got a pained look on his face, drew his
24

25 ²¹ §3.6, p. 3.317, first line, states, "**The public right-of-way (interspersed in all zones) holds 23 percent of the**
26 **city's tree canopy.**" (Emphasis added)

²² In the RUV expansion area, Mr. Wheeler's shrub count includes about 92 shrubs between 10-20 feet, about 22
between 21-30 feet, and 8 greater than 31 feet. Ex. 190, p. titled "Shrub Height."

1 shoulders forward, and hunched over. His body language was clear even as he avoided
2 answering the question.²³

3 Mr. Leach was also asked about Ex. 134, written by a City employee reviewer, M.
4 Glowacki, which states, pp. 1-2:

5
6 The 2016 tree canopy cover reveals that there is disparity in the amount of tree canopy cover in people of
7 color neighborhoods and lower income neighborhoods. Because the biological resources information and
8 specifically the tree canopy loss data was not analyzed [in the MHA FEIS] based on neighborhoods it cannot be
9 determined what impacts on racial equity are created by additional tree canopy cover loss or additional impacts
10 on other biological resources. Need to bring the analysis of tree canopy and environmentally critical areas and
11 shorelines to the neighborhood level...

12 First an analysis needs to be conducted that includes the following: Overlaying the canopy cover data, the
13 environmentally critical areas data, the equity and the environment initiative data, shorelines data and MHA
14 data to determine what impacts are occurring in each neighborhood. Then need to develop a mitigation plan that
15 allows for protection and enhancement of the biological resources in the areas that do not have these resources.

16 Mr. Leach was asked, "Based on the data that's in the EIS presently, is there anything that indicates
17 which neighborhoods or projects in this area – in the project area – do not have these resources?"

18 Let's just take tree canopy." Mr. Leach said, "For our assessment, no." Mr. Bricklin followed up
19 and asked whether it would have been easy to do the tree canopy overlay by urban village
20 designation instead of "zones." Mr. Leach said:

21 It'd be very easy to run the calculation. Again, there's the whole steps – once you finish the
22 calculation, going through the review, and then all the way to the development of the reports.
23 So I say it's easy, but there's a process to do it, but yes, in general it can be done.

24 The MHA FEIS includes three tables titled "Tree Canopy Analysis," one table for each
25 alternative (2, 3, and preferred; see n.15, *supra*.) These tables look very scientific since they use
26 terms like "Change Coefficient" with percentages to the second decimal point. But these
coefficients are meaningless because the underlying "supporting" data is wrong.

²³ The finder of fact assesses credibility.

1 Starting with "Existing" (far left column), the first entry is "Green Space," acres that will not
2 change due to upzoning. DOT right-of-way street trees will not change due to upzoning. Yet,
3 unlike other static "green space," street trees are included in the acreage for every existing "zone"
4 that will be upzoned. The FEIS states at p. 3.317, first sentence, "The public right-of-way
5 (interspersed in all zones) holds 23 percent of the city's tree canopy." Therefore, the baseline - to
6 determine the impact of upzoning on *parcels* – is substantially inflated because street trees are
7 included. Second, the LIDAR canopy technique includes not only trees, but large shrubs. Thus,
8 "Acres of Tree Cover" (fourth column from left) is a misnomer and inaccurate because "Tree Cover"
9 on parcels (where there will be impacts) is not solely tree cover at all but also includes tall shrubs as
10 well as street trees.
11

12 By way of example, in the RUV expansion area alone, there are 122 shrubs ten-feet and
13 taller (and probably many more between 8 to 10 feet, but Mr. Wheeler did not count those). Ex. 190,
14 p. titled "Trees and Shrubs." And he counted 425 trees, which includes street trees. (Assuming 23%
15 are street trees - 98, there would be 327 trees on parcels.) Thus, using this example for the RUV
16 expansion area, the City's calculation would include as "Tree Cover" a combined total of 220 street
17 trees and shrubs (98 trees + 122 shrubs) that should not be included, as compared to 327 trees that
18 should be included. This is a 67% error rate ($220 \div 327$) in calculating trees on parcels. Thus, in this
19 example the baseline data include 67% more "trees" than actually exist on parcels.
20
21

22 The City thus starts with a grossly inflated and inaccurate number for "Tree Cover" per zone
23 type (2nd column from left). Deductions for tree loss due to upzoning are subtracted from this
24 inflated number. The result, of course, is that tree loss is purported to be *de minimis*, whereas, as the
25 RUV expansion area shows, the reality is that tree loss would be significant.
26

1 Compounding this "error,"²⁴ are additional invalid analyses. As Prof. Ewing noted, which
2 the FEIS does disclose, there are no valid data for upzones from SF to RSL due to insufficient
3 sample size. The FEIS also aggregates urban villages into four categories. One category includes
4 seven urban villages, another five, another 13, and one with only two (See ftns.15-19, *supra.*) We
5 have no idea about the actual acreage of each urban village, the actual tree canopy in each, or the
6 actual upzoning proposals in each and how these interface. Aggregated data is a form of averaging,
7 to obfuscate the effects on the ground and make it impossible to understand the real impacts.²⁵

9 As. Prof. Ewing and Ms. Glowacki stated, the analysis of ECAs and tree canopy must be
10 brought to the neighborhood level in order to determine the actual impacts. Mr. Leach conceded this
11 was not difficult to do. Indeed, the lab proposal states, Ex 215, p. 21, metrics would be provided by
12 neighborhood. Although the City has neighborhood-by-neighborhood data, and could have done
13 overlays for each urban village and expansion areas, it did not do so. This makes it impossible for
14 decision-makers to determine the extent of tree cover for each UV, which ones have less, which
15 more, where the tree cover is located, and the impact of proposed upzones on tree cover.

17 In summary, for all the above reasons and for the reasons provided by other appellants, the
18 MHA FEIS analysis of the impacts on tree loss is not only inadequate, but the entire analysis was
19 unreasonable and appears to be duplicitous.

21 ²⁴ These calculations appear to be deliberate. The City knows full well that street trees are not on parcels. It
22 also knows that shrubs were included in the "tree" calculation but *failed to disclose that fact in the FEIS*. The distinction
23 between shrubs and trees is critically important because the FEIS discussion on mitigation describes ordinances, an
24 Executive Order, and proposed legislation to protect *trees on private property*, pp. 3.340-3.342. These do not protect
25 shrubs.

26 ²⁵ Some say, "There's lies, damn lies, and averages." Averages can be misleading. To illustrate this point is a
joke about a man with one foot in a bucket of boiling water and the other foot in a bucket of freezing water. The man
subjected to the excruciating extremes of temperature exclaimed that "on average" he felt comfortable.

Here, some urban villages in a group may have copious trees and shrubs while others just a few. The "average"
will not show the reality. Had the City done an overlay urban village by urban village, which it could have easily done,
the result would be obvious – buckets of green and buckets of not green.

1 **III. The Analysis of Historic Resources Is Unreasonable and Inadequate and Does Not**
2 **Enable A Decision-Maker To Make Knowledgeable Decisions Because The City Did**
3 **Not Present An Adequate Level of Detail Of Historic Resources That It Had Readily**
4 **Available and Could Have Presented at Little Cost.**

5 A. Overview.

6 Historic and cultural preservation is an element of the environment under WAC 197-11-
7 444(2)(vii). Pursuant to chapter 43.12 RCW and WAC 197-11-960, the agency must make a
8 checklist to help identify impacts from the proposal. WAC 197-11-960B(13)(a) states, "Are there
9 any buildings or structures that are over 45 years old listed in or eligible for listing in national, state,
10 or local preservation reregisters: if so, specifically describe." For nonproject actions a supplemental
11 sheet is required (to be read in conjunction with the list of elements in the environment). WAC 197-
12 11-960D(4) states: "How would the proposal be likely to use of affect environmentally sensitive
13 areas or areas designated (or eligible or under study) for governmental protection: such as ...historic
14 or cultural sites...?"²⁶

15 An issue in this appeal is what does "eligible for listing" mean? Ms. Paula Johnson, an ESA
16 consultant, who also prepared the City's programmatic Uptown DEIS and FEIS section on historic
17 resources, used age alone as the sole criterion for the Uptown EIS, together with a map of the
18 Uptown boundary because these parcels were "potentially" eligible for future listing as a historic
19 resource. (Ex. 261, p. 3.187, Exhibit 3.5-7) The Uptown map has orange and blue areas within the
20 boundary explained by the key, "Register and Landmarked-Listed and Potentially Register or
21 Landmark-Eligible Properties." Orange sections - "Meets minimum-age threshold for NRHP
22
23

24 ²⁶ SMC 25.05.315A states: Agencies shall use the environmental checklist substantially in the form found in
25 section 25.09.960 [which states the same the same thing] to assist in making threshold determinations for proposals,
26 except for public proposals ["public projects", SMC 25.05.060C(1)(a)] in which the lead agency has decided to prepare
its own EIS, proposals on which the lead agency and applicant agree and EIS will be prepare; or projects which are
proposed as planed action (see subsection B of this section.)"

1 eligibility (50 years, pre-1967). Blue sections meet the City's 25-years eligibility. The map also
2 identifies Seattle Landmark buildings with a circle.

3 On Ms. Johnson's re-direct, after Appellant's counsel asked why, for the MHA EIS, the
4 historic resources couldn't be similarly shown on a map on the basis of age. Mr. Vesalius asked Ms.
5 Johnson:
6

7 [I]f I were to tell you that there were between 3,400 - 3,600 acres that are rezoned pursuant to MHA
8 – What would you have done to your level of effort needed to do it that way?

9 Paula Johnson: That would have been a significant number crunch to try to make sense of that data
10 to make the 27 different urban villages have comparable sets of data.

11 Ms. Johnson's statement is, in fact, incorrect. There would be no "significant number
12 crunch" to make comparable sets of data because the City already has year-built data for every
13 parcel – "comparable data" to the Uptown EIS. The City had already compiled a database for every
14 urban village, and for every parcel within the urban village and expansion area, including the year
15 built for every parcel. (Testimony of David Ward, who prepared Ex. 310 from the database the City
16 provided in discovery.) Ex. 310 is sorted by urban village and age built, with a cut-off date of 1939
17 – since most Craftsman era homes were built before 1939 - and lists 4,876 parcels by address and
18 PIN. The PIN (parcel identification number) allows the user to easily place each parcel on a map.
19 (*Id.*) Thus, every urban village has "comparable sets of data" based on the year built – just as Ms.
20 Johnson used year built as the sole criterion to show historic resources on a map for the Uptown EIS.
21 On rebuttal, Mr. Spencer Howard testified that he used the data from the same database to transfer
22 the information to a map, and it was easy to do.²⁷

23
24
25 ²⁷ The City tried mightily to distinguish the programmatic Uptown EIS from the programmatic MHA EIS
26 arguing the Uptown area is much smaller, the Uptown EIS had been in progress for a while, there was a community plan
to consider, *et al.* But all of those distinctions are irrelevant. The City could have easily done the identical analysis as for
Uptown because the City data were readily available and simply needed to be overlaid to urban village maps.

1 Had the City used the same criteria as the Uptown EIS, it would have been a simple process
2 at little cost. More importantly, it would have clearly shown decision-makers where these potential
3 historic resources are located within every urban village in the project area. Instead, readers found
4 the data displayed in the MHA DEIS and FEIS baffling. Ex. 2, §3.5, is titled "Historic Resources."
5 The EIS has two maps (north and south Seattle, pp. 3.300-.301, Exs. 3.5-2 and 3.5-3) with 111 dots
6 (§3.5, p. 298, Ex. 3.5-1) on a map that show only sites taken from the NRHP (National Register of
7 Historic Places) from the Washington state database maintained by the Department of Archaeology
8 and Historic Preservation. The EIS contains no explanation why only these sites were mapped;
9 Seattle inventories of historic resources at the DON web site are not normally included in the state
10 database. (Spencer Howard).

11
12 Therefore, all appellant witnesses who testified about historic resources, discussed the EIS's
13 lack of mapping for individual urban villages.²⁸ Spencer Howard prepared maps not only of the
14 NRHP sites, but N. Rainier's historic resources, and other City inventories using entries from the
15 Seattle Department of Neighborhood's web site. This web site lists historic resources inventoried
16 from the year 2000 and later, by address or by neighborhood each parcel (including a photo of the
17 building) that had been surveyed. (landSee, e.g., Mr. Vieth's exhibits for Wallingford, Ex.s 117, 120
18 [Ex. 120 also shows pictures of Landmark buildings near and in the Wallingford UV.]) Tom Veith
19 similarly mapped Wallingford's historic resources within the UV using the same City database. Ex.s
20 118, 119. Davidy Kasperzyk submitted a map of Ballard historic resources by year built. Ex. 33. For
21 the Roosevelt UV and expansion area, which had never been surveyed by the City, Lawrence
22
23
24

25 ²⁸ Eugenia Woo, Historic Seattle; Spencer Howard, N. Rainier; Davidya Kasperzyk, Ballard; Jennifer Ott, the
26 Olmstead Boulevard legacy; Lawrence Kreisman, the Cowen section of the Roosevelt UV and the proposed expansion
into Ravenna; Tom Veith, Wallingford; Jennifer Scarlett, South Park; and Mira Latoszek, Beacon Hill.

1 Kreisman provided maps of the Ravenna-Cowen Historic District (Ex. 91), which identify every
2 parcel by year-built, together with examples of "continuation sheets" from the application, which
3 contain a picture of each dwelling and full survey information.²⁹ Ex. 92, pp. 30, 62, 78 and 86.

4 All these witnesses pointed out that there were readily identifiable historic resources that
5 could be mapped but weren't.³⁰ And uniformly, each said the reason to do an overlay of historic
6 resources on urban village proposed upzone maps was to inform decision-makers of the impacts if
7 upzoning were to occur so that they could make a knowledgeable decision.

8
9 B. Testimony By Lawrence Kreisman re Historic Resources, the Ravenna-Cowen
10 Neighborhood and EIS Deficiencies and Examination of the City's Witnesses.

11 Friends of Ravenna-Cowen called Mr. Kreisman to testify about his knowledge of Seattle's
12 history, its historic resources, the Ravenna-Cowen neighborhood, and his review of §3.5. Mr.
13 Kreisman's extensive resume is summarized in the footnote below.³¹ In addition, he is a prolific
14

15
16 ²⁹ N. Rainier had notified the City of its application for a national historic district designation before the FEIS
17 was published. Spencer Howard. (This is never mentioned in the EIS.) But the Ravenna-Cowen North historic District
18 application did not exist at the time of the DEIS or FEIS. The City had never conducted a survey of the Ravenna-Cowen
19 area although Mimi Sheridan recommended in 2002 that a survey be undertaken. Ex. 45, COS005736. The 2035 Seattle
20 Comp. Plan singles out the RUV, R-HG 1: "Protect and maintain the architectural heritage of Roosevelt's Craftsman,
21 bungalow, and Tudor-style housing while embracing growth of well-designed buildings of an appropriate scale." But the
22 EIS does not cite R-HG 1. Ex. 3, p. 381. Comment letters pointed out Ravenna/Cowen's historic resources, but these
23 were ignored. Ex. 288, Larry and Lani Johnson, which states that "several architectural historians consider
24 Ravenna/Cowen one of Seattle's best twentieth century examples of bungalow neighborhoods and redevelopment would
25 irreversibly and irretrievably alter its architectural integrity and historic fabric;" Ex. 292, Judith and Arnold Bendich (The
26 City never included this letter with other DEIS comment letters.); Ex. 290 (compendium of DEIS comment letters):
Judith Bendich; Karen Hardisty; Dana Standish; John Stewart.

³⁰ These included the Seattle DON database, Seattle's 1979 inventory of 34 Seattle neighborhoods (Exs. 46,47,
and 48), and the 1976 Nyberg and Steinbrueck inventories, which contain the history of each neighborhood and identify
historic resources in 16 neighborhoods, on the Historic Seattle web site, [https://historicseattle.org/neighborhood-](https://historicseattle.org/neighborhood-inventories/)
[inventories/](https://historicseattle.org/neighborhood-inventories/). This study is mentioned in the EIS (p. 3.299), but this web site is not. At the hearing Mr. Kreisman, who
still owns an original set of these large maps, held one up to display it.

³¹ Mr. Kreisman has a masters of architecture degree with a certificate in urban design from the UW. He
worked for the City of Seattle during while in graduate school and inventoried historic resources as part of the City's 1979
neighborhood surveys. He taught classes at the UW on preservation and urban design and taught in Antioch's summer
program instructing teachers. For nine years Mr. Kreisman worked for the Seattle Architecture Foundation, and served as
a consultant for three years thereafter, where he implemented walking tours of Seattle neighborhoods, including Ravenna-
Cowen. In 1997 Mr. Kreisman became the Program Director for Historic Seattle and retired in 2017. Mr. Kreisman