

1 SEATTLE HEARING EXAMINER

2
3 In the Matter of the Appeal by
4 QUEEN ANNE COMMUNITY COUNCIL
5 of the Final Environmental Impact
6 Statement for the proposed legislation on
7 accessory dwelling units

Hearing Examiner File
No. W-18-009

APPELLANT'S PRELIMINARY LIST OF
PROPOSED WITNESSES AND
EXHIBITS

8 The appellant identifies the witnesses and exhibits listed below:

9 Witnesses

10 1. William Reid,

11 Mr. Reid is an economist by education, background, training and work. His
12 resume is included with this filing. Mr. Reid will be called to testify regarding the
13 adequacy of the EIS's disclosure, analysis and mitigation regarding direct,
14 indirect, and cumulative impacts of the proposed legislation upon housing,
15 existing and estimated populations, and displacement. Mr. Reid's direct
16 testimony is estimated to take approximately 1½ hours.

16 2. Ross Tilghman

17 Mr. Tilghman is a transportation planner by education, background, training and
18 work. His resume is included with this filing. Mr. Tilghman will be called to testify
19 regarding the adequacy of the EIS's disclosure, analysis and mitigation relating
20 to the direct, indirect, and cumulative impacts of the proposed legislation upon
21 on-street parking availability and capacity. Mr. Tilghman's direct testimony is
22 estimated to take approximately 2 hours.

21 3. Martin Kaplan

22 Mr. Kaplan is a Seattle architect and the chair of the Land Use Committee of the
23 Queen Anne Community Council. His resume is included with this filing. Mr.
24 Kaplan will testify on Appellant's interests in bringing the appeal, on the
25 inadequacy of the EIS's consideration of aesthetic, height, bulk and scale
impacts of the proposal, of the condominiumization of ADUs and principal

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dwelling, and on incompleteness of the City’s responses to comments on the Draft EIS. Mr. Kaplan’s direct testimony is estimated to take approximately 1 hour.

- 4. Any witness listed by any other party.
- 5. Any additional witnesses necessary to rebut those offered by the City or any other party.

Exhibits

- 1. The Draft and Final EIS, including Appendices
- 2. Findings and Decision in the DNS appeal
- 3. Other core documents designated by the City
- 4. Notice of Appeal
- 5. Resume, William Reid
- 6. Resume, Ross Tilghman
- 7. Resume, Martin Henry Kaplan
- 8. Real estate documents relating to the condominiumization of principal accessory dwelling units
- 9. Sample curb measurements in NE and NW study areas
- 10. Comparison of FEIS parking inventory with measured samples
- 11. Pipeline development projects
- 12. Recent parking studies in NW study area
- 13. Map showing block dimensions and walking distances
- 14. Identification of blocks currently exceeding 85% utilization
- 15. Impact of maximum occupancy ADU development upon on-street parking

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- 16. Selections from documents produced by the City in response to Queen Anne's requests for public records, an on-going process due to the volume of documentation produced.
- 17. The City's responses to Appellant's requests for field notes, tabulations of curb measurements, and other data used to determine parking supply for the blocks within the northeast and northwest parking study locations.
- 18. The City's responses to Appellant's requests for documentation of parking availability, utilization, and projected impacts upon on-street parking from ADU development in single-family residential neighborhoods not considered in Appendix B, including, but not limited to, Magnolia, Queen Anne, Fremont, Wallingford, Ravenna, Montlake, Madrona, Madison Park, Capitol Hill, Leschi, Mt. Baker and Beacon Hill.

Appellant reserves the right to offer any exhibit listed by any other party and to supplement this list with exhibits necessary to rebut or refute exhibits offered by the City or any other party.

Dated this 31st day of January, 2019.

LAW OFFICES OF
JEFFREY M. EUSTIS, PLLC

/s/ _____
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Attorneys for Queen Anne Community Council

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DECLARATION OF SERVICE

I am over eighteen years of age and competent to be a witness herein. On the date below, I served by email copies of the foregoing document upon the parties of record, addressed as follows:

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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge and belief.

DATED: January 31, 2019

/s/ _____
Jeffrey M. Eustis