

BEFORE THE HEARING EXAMINER
FOR THE CITY OF SEATTLE

In Re: Appeal by

GRANT PROTECTION FOR TREES, *et al.*,

Of Decisions Re Land Use Application
and Code Interpretation for 2813-2815
4th Ave. West.

Hearing Examiner File:

MUP-19-004 – MUP-19-015

Department Reference:

3029801-LU & 3030630-LU

**REED LYONS' WITNESS AND
EXHIBIT LIST**

Pursuant to the Hearing Examiner's Prehearing Order (April 4, 2019) Appellant Reed Lyons submits the following list of witnesses and exhibits:

I. WITNESSES

Mr. Lyons may call the following witnesses to testify at the appeal hearing. The general subject matter of their expected testimony is noted below.

1. Reed C Lyons, P.E. Mr. Lyons owns and lives in a single-family home across the street and north of the proposed Multifamily development. Mr. Lyons is also a Professional Engineer with more than 50 years of experience in the construction and development industry. If called, Mr. Lyons is expected to testify as a factual witness regarding the neighborhood environment as it relates to the proposed project. Approximate direct testimony time 1 hour.

2. Kurt D. Merriman, P.E. Mr. Merriman is a Senior Principal Geotechnical Engineer for Associated Earth Sciences, INC. (AESI) in Kirkland Washington. AESI a geotechnical engineering firm, which has substantial experience in providing geotechnical engineering in the area. If called, Mr. Merriman will testify as an expert witness regarding geotechnical issues, including the existing underground springs, past landslide activity, previous grading activities, steep slope evaluation, and adequacy of proposed foundation designs. Approximate testimony time 1 hour.

3. Witnesses named by other parties in this matter.

II. EXHIBITS

Mr. Lyons identifies the following exhibits it may use at the hearing in this matter:

1. All electronically accessible project documents posted on the Seattle Department of Construction and Inspections website for the two addresses of 2813 and 2815 4th Avenue West.

In addition to the exhibits identified above, Mr. Lyons reserves the right to introduce exhibits identified by any other party, to introduce additional exhibits as allowed by the city of Seattle Hearing Examiner rules, and to introduce additional exhibits during cross-examination or rebuttal.

Dated on this 9th day of July, 2019.

Respectfully submitted,

By:  _____

Reed Lyons PE

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CERTIFICATE OF SERVICE

I certify under penalty of perjury under the laws of the State of Washington that on this date I sent true and correct copies of the attached mailing list, in the matter of *Grant Protection for Trees, et al.*, Hearing Examiner File: MUP-19-004(W) – MUP-19-015(W) by electronic mail.

Appellants

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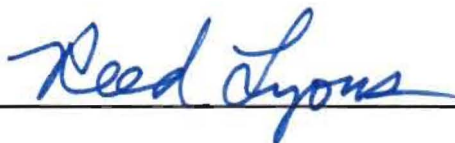
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DATED: July 9, 2019

A handwritten signature in blue ink that reads "Reed Lyons". The signature is written in a cursive style and is positioned above a solid horizontal line.