

FINAL APPELLANT WITNESS LIST

(THIS SUPPLEMENTS THE PRELIMINARY WITNESS AND EXHIBIT LIST)

All Dates and Times are tentative...

MONDAY

- 1. 9:45am Julian Weber for Katie Luedeman (or Architect in charge), JW Architects**
- 2. 10:30am Colt Boehm, Mirra Homes**
- 3. 11:30pm Andy McAndrews, Terrane**
- 4. 2:00pm David Landry, Planner for Engineer**

TUESDAY

- 5. 9:00am Harold Scoggins, Fire Chief**
- 6. 10:00am H. Michael Xue, P.E. (or, if qualified, John A. Manke), PanGEO**
- 7. 11:00am Jay La Vassar**
- 8. 1:00pm Jay La Vassar**
- 9. 2:00pm Todd McChesney, 3417 / 3419 22nd Ave W building**
- 10. 2:30pm David Landry, Planner for Director Torgelson**
- 11. 3:30pm Tony Shoffner, Arborist (13th after 10am)**
- 12. 4:15pm Michael Oxman, Arborist**

WEDNESDAY

- 13. 9:00am Toby Thaler, Seattle lawyer**
- 14. 10:30am David Moehring, Architect**

FINAL APPELLANT EXHIBIT LIST

<u>Witness</u>	<u>Exhibit #</u>	<u>Description</u>	<u>Topic</u>
SDCI	Appellant Tab set A	SDCI 3410 address short plat decision dated April 29, 2019 and Notice of Short Plat dated January 17, 2019 (2 docs)	Conditioned
SDCI	Appellant Tab AA	SDCI Land Use Applications for 3422 and 3420 23 rd Ave W dated November 26, 2017; and decision (2 docs)	Segmented process of permitting; conditioning
SDCI	Appellant Tab set B	SDCI 3416 address short plat decision dated April 29, 2019 and 3418 address Notice of Land Use Application Plat dated December 3, 2018; and 3414 23RD AVE W Notice of Subdivision Application dated October 25, 2018(3 d)	Conditioned
SDCI	Appellant Tab BB	SDCI list of project records for 3420, 3422 and 3424 23 rd Ave W	Segmented process of permitting ; Source of project records
Moehring; Arborist; Civil	Appellant Tab C, C-1	Photos annotated showing existing conditions	Emergency Access; Retention of Trees
SDCI	Appellant Tab CC	Sign for 3420 and 3422	Rowhouse; error 2 verses 3 buildings
SDCI	Appellant Tab CC1	Sign for 3410 and 3412	Rowhouse; 2 buildings
SDCI	Appellant Tab D	SDCI Correction comments for 2310-3418 23 rd Ave W	8 parts;____; Fire; Easements
SDCI	Appellant Tab DD	SDCI Correction comments for 2320-3424 23 rd Ave W	

Terrane	Appellant Tab E	Terrane-prepared existing plat and site plan drawings	Topo drawings
PanGEO/ JW	Appellant Tab F	JW Architects-prepared Lot A Site Plan	Conditioned Short Plat
PanGEO	Appellant Tab G	PanGEO-prepared Report Sept 28, 2018 3032940-LU; Poster of composite of all three parent lots	Access Easement
	Appellant Tab GG	Correspondence between Henry McGuire and Director and City Staff	
PanGEO	Appellant Tab H	PanGEO-prepared report dated November 30, 2018.	Conditioned Short Plat
Moehrring	Appellant Tab HH	Plat Map (6)	
SDCI	Appellant Tab I	“Vehicle Access Easement Standards” issued October 31, 2017.	Access Easement
PanGEO/ Jay	Appellant Tab II	AASHTO Vehicle https://www.bestmaterials.com/PDF_Files/geometric_design_highways_and_streets_aashto.pdf	Access Easement ; pp 2, 11-39, 56-84, 234, 276, 398-447, 455-457
Shoffner / JW Arch	Appellant Tab J	Tree inventory and architect’s consideration for trees. (2 docs)	Tree Retention
SDCI	Appeal Tab K	Building Plans Examiner Supervisor “global stability of site”.	Conditioned Short Plat
SDCI	Appeal Tab L	Planners’ correspondence reviewing “site stabilization”.	Conditioned Short Plat
SDCI & Terrane & JW	Appeal Tab M	Drawing set (20 pp) for 3410 23rd Ave W.	Easements; Short Plat; Access
SDCI & Terrane & JW	Appeal Tab MM	Drawing set (13 pp) for 3412 23rd Ave W.	Easements; Short Plat; Access
SDCI & Terrane & JW	Appeal Tab N	Drawing sets (20 pp) for Subject Properties from 3418 23rd Ave W.	Easements; Short Plat; Access

SDCI & Terrane & JW	Appeal Tab NN	Drawing set (16 pp) for Subject Properties from 3416 23rd Ave W	Easements; Short Plat; Access
SDCI & Terrane & JW	Appeal Tab O	Drawing sets (21 pages)for Subject Properties from 3422 23rd Ave W.	Easements; Short Plat; No Access
SDCI & Terrane & JW	Appeal Tab OO	Drawing sets (11 pages)for Subject Properties from 3424 23rd Ave W.	Easements; Short Plat; No Access
	Appeal Tab P	Fire Prevention Division of the Seattle Fire of no documentation.	
Moehring	Appeal Tab Q	August 10 2017 Code analysis “Rowhouse Developments on LR1-Zoned Lots Code Analysis”	
Moehring / SDCI	Appellant Tab R	Reply to SDCI Motion; SDCI Memo and TIPS 256	Interpretations
Moehring	Appellant Tab S	Appellant Reply to Applic/Owner MTD & SJ	
	Appellant Tab EE	(skipped)	
	Appellant Tab FF	SDCI Short Plat Decision for 3422 address issued May 28, 2019	
Mirra, SDCI	Appellant Tab 1	Project Applications	Intent of SP: Multiple Applications, Why?
Mirra, SDCI	Appellant Tab 2	Exhibit A of SMC 23.84A.024	Multiple Applications, Why?
SDCI	Appellant Tab 3	Case – “Exclusive Easement”	Access Easement
Moehring	Appellant Tab 4	Declaration(s) of David Moehring July 1, 2019	Short Plat to Circumvent
SDCI	Appellant Tab 5	Short Plat application and public comment	Upzone Sh. Plat Circumvent;
	Appellant Tab 6	Revised Street Tree and Correspondence	Tree Retention
SDCI	Appellant Tab 7	SDCI Tips 213A Application Requirements for Short Plats	From Gerry appeal

SDCI	Appellant Tab 8	Definition of Exclusive	Access Easement
Moehring	Appellant Tab 9	MUP-19-019 Reply in Opposition to Applicant and Owner MTD & SJ dated July 1, 2019	
SDCI	Appellant Tab 10	King County Title 19	ROWHOUSE
Moehring	Appellant Tab 11	Maps of Short Plat Examples; and list	Short Plat to Circumvent
Moehring	Appellant Tab 12	5 examples of Short Plats; 1 with memo	Access; Added 6 th examp 2432 and 2430 NW 60 th to SDCI
	Appellant Tab 13	Correspondence of Scott Pawling from Public Records request	
	Appellant Tab 14	Zoning Maps for Area (3)	
	Appellant Tab 15	[blank]	
Terrane	Appellant Tab 16	Declaration of McAndrews dated 18 June 2019	Fire Dept Review; and supplement to City only
SDCI	Appellant Tab 17	SMC Reference LR comparison; http://www.seattle.gov/DPD/Planning/Multifamily_Code_Update/Overview/	Rowhouse Development Rule
SDCI	Appellant Tab 18	Sally Clark: 2010 Changes to 23.45	Rowhouse Development Rules
Moehring	Appellant Tab 19	Supplemental Authority MUP-17-036	Rowhouses from Short Plat; Applicable 23.84A
Moehring	Appellant Tab 20, 20.1	Subpoenas Issued by Hearing Examiner; Subpoena Order	
SDCI	Appellant Tab 21	Torgelson Documents resulting from Subpoenas ; SDCI Engineer Documents resulting from Subpoenas	Short Plat A, B, C
SDCI	Appellant Tab 22	SDCI Engineer Documents resulting from Subpoenas [PENDING REPLY]	Conditional

Fire Dept / Jay	Appellant Tab 23	Turn Arounds and International Fire Code Appendix D	Emergency Access
Fire Dept	Appellant Tab 24	Harold Scoggins documents resulting from Subpoenas and typical fire truck	Emergency Access
	Appellant Tab 25	[UNUSED]	
JW Arch	Appellant Tab 26	JW Architects Documents resulting from Subpoenas	Emergency Access; tree retention
	Shoffner asked to testify August 13 after 10am		
Tony Shoffner	Appellant Tab 27	Arborist Services Documents resulting from Subpoenas	Arborist Scope of Services
Tony Shoffner	Appellant Tab 28	Arborists Justification Documents resulting from Subpoenas	Arborist photos (winter??)
Moehring	Appellant Tab 29	Neighbors' Declarations	Public Interest
	Appellant Tab 30	[UNUSED]	
Jay LaVasser	Appellant Tab 31	http://www.seattle.gov/dpd/LandslideStudy/figb18.pdf Seattle Area Landslide Map	Emergency Access
Jay LaVasser	Appellant Tab 32	SEPA Checklist from 3412 23rd Ave W	Conditioned Short Plat
David	Appellant Tab 33	CV Profile of David Moehring AIA NCARB	All
	Appellant Tab 34	CV Profile of Jay La Vasser	
David	Appellant Tab 35	CV Profile of Michael Oxman, Arborist	Tree Retention
	REFERENCE CODES AND DIRECTOR'S RULE (no print)		
	Director's Rule 7-2018		
	Director's Rule 18-2007		
	Director's Rule 16-2008		
SDCI	SMC 23.24		Short Plat criterion of 23.24.040.A.9
SDCI	SMC 23.44		Decision SMC 23.44.008

SDCI	SMC 23.45		Table A 512
SDCI	SMC 23.53	Emergency vehicle access	Vehicle access
SDCI	SMC 23.54	Including driveway standards 23.54.030.D.1	Vehicle access
SDCI	SMC 23.76	Including SMC 23-76-028	
SDCI	SMC 23.84A	Including but no limited to Legal Lot (.024) and Rowhouse Development (.032)	
SDCI	SMC 23.88		interpretations
SDCI	SMC 25.05		
SDCI	SMC 25.09		Decision 25.09.070, and 25.09.080 A and B
SDCI	SMC 25.11		25.11.050 and/or 25.11.060
Fire Dept	IFC Appendix D (see 'S')	Access Maneuvering space and Distance for dead-end	Access
	Seattle Fire Code Chapter 10	If the lot does not have vehicular access from a street or private easement that meets the regulations for fire access roads	