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8 BEFORE THE HEARING EXAMINER
9 FOR THE CITY OF SEATTLE

10 In the Matter of the Appeal of
11 ESCALA OWNERS ASSOCIATION
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13 from a decision issued by the Director, Seattle
14 Department of Construction and Inspections
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Hearing Examiner File:
MUP-19-031 (DD, DR, S, SU, W)

Department Reference:
3018037-LU

APPLICANT’S WITNESS AND
EXHIBIT LIST

18 The Applicant Seattle Downtown Hotel & Residences, LLC (“Applicant”) submits the
19 following list of witnesses and exhibits in this appeal.
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21 **I. WITNESS LIST**

22 The following are witnesses that Applicant may call in this matter:

23 1. Marni Heffron, PE, PTOE, Principal, Transportation Engineer, Heffron
24 Transportation Inc. Ms. Heffron’s resume is included as an exhibit. Ms. Heffron may testify
25 regarding transportation issues relating to the mixed-use development at 1903 Fifth Avenue,
26 Seattle (“Project”), including but not limited to application of the criteria of RCW
27 43.21C.500(1)(a) and (b) to the Project; the transportation analysis for the Project; State
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APPLICANT’S WITNESS AND EXHIBIT LIST
Page 1 of 5

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1 Environmental Policy Act (“SEPA”) review of the Project as it relates to transportation; and the
2 design and operation of the Project as it relates to transportation, including but not limited to
3 access, deliveries and loading. Ms. Heffron may respond to testimony offered by Appellant
4 Escala Owners Association (“Appellant”) relating to transportation. Applicant estimates Ms.
5 Heffron’s direct testimony may take approximately 90 minutes.
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7 2. Terry McCann, Senior Planner, EA Engineering, Science and Technology, Inc.
8 Mr. McCann’s resume is included as an exhibit. Mr. McCann may testify regarding the SEPA
9 process for the Project and the SEPA analysis for the Project. Mr. McCann may testify regarding
10 the application of the criteria of RCW 43.21C.500(1)(a) and (b) to the Project. Mr. McCann may
11 respond to testimony offered by Appellant relating to the SEPA process and SEPA analysis for
12 the Project. Applicant estimates Mr. McCann’s direct testimony may take approximately 60
13 minutes.
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15 3. Michelle Sarlitto, Senior Planner, EA Engineering, Science and Technology, Inc.
16 Ms. Sarlitto’s resume is included as an exhibit. Ms. Sarlitto may testify regarding the SEPA
17 process for the Project and the SEPA analysis for the Project. Ms. Sarlitto may testify regarding
18 the application of the criteria of RCW 43.21C.500(1)(a) and (b) to the Project. Ms. Sarlitto may
19 respond to testimony offered by Appellant relating to the SEPA process and SEPA analysis for
20 the Project. Applicant anticipates that either Mr. McCann or Ms. Sarlitto may testify and that the
21 testimony of them may take approximately 60 minutes.
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23 4. Ted Caloger, AIA, Principal, MG2 Corporation. Mr. Caloger’s resume is
24 included as an exhibit. Mr. Caloger may testify about the design of the Project; SEPA review of
25 the Project as it relates to the Project design; the Design Review process and the Project’s
26 consistency with Design Review Guidelines; and the Project’s compliance with development
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standards, including but not limited to those relating to access and loading. Mr. Caloger may respond to testimony offered by Appellant relating to the design of the Project, the Design Review process and Guidelines, and compliance with development standards. Applicant anticipates that Mr. Caloger's direct testimony may take approximately 30 minutes.

5. Marco Felice, General Manager, Stanford Hotels. Mr. Felice has fifteen years of experience in the hotel industry with twelve years of experience as a Director or General Manager. Mr. Felice may testify regarding his experience with hotel operations, including but not limited to deliveries and loading. Mr. Felice may respond to testimony offered by Appellant relating to Project operations, including but not limited to deliveries and loading. Applicant anticipates that Mr. Felice's direct testimony may take approximately 30 minutes.

6. Scott Brown, President, American Trash Management. Mr. Brown has extensive experience with trash management, deliveries and loading for a wide range of businesses. Mr. Brown may testify regarding his experience with trash management, delivery and loading operations. Mr. Brown may respond to testimony offered by Appellant relating to Project operations, including but not limited to trash collection, deliveries and loading. Applicant anticipates that Mr. Brown's direct testimony may take approximately 30 minutes.

7. Witnesses listed by Appellant or City of Seattle ("City").

Applicant reserves the right to call additional witnesses for the purposes of rebuttal or impeachment and to call substitute witnesses if any of the witnesses identified above become unavailable.

II. EXHIBIT LIST

The following are exhibits that Applicant may introduce in this matter:

1. Resume of Marni Heffron

2. Resume of Terry McCann
3. Resume of Michelle Sarlitto
4. Resume of Ted Caloger
5. Land Use Code Interpretation No. 19-004, January 7, 2020
6. Request for Code Interpretation, October 24, 2019
7. Curbcut Early Determination Letter, July 14, 2015
8. Land Use Code Interpretation No. 15-005, October 10, 2019
9. Bicycle Master Plan (2014)
10. Move Seattle (2015)
11. Transit Master Plan (2016)
12. Pedestrian Master Plan (2017)
13. One Center City – Seattle’s Near-Term Action Plan (2018)
14. North Downtown Mobility Action Plan (2019)
15. Imagine Greater Downtown (2019)
16. Early Design Guidance Packet, October 31, 2014
17. Early Design Guidance Packet, September 29, 2015
18. Early Design Guidance Packet, December 15, 2015
19. Design Review Recommendation Meeting Packet, August 16, 2016
20. Master Use Permit Plan Set, April 1, 2019
21. Medium Demand Use Diagrams, Level 1, Level 50 and Level 51
22. Re-Notice of Revised Application, Adoption of Final Environmental Impact Statement and Availability of Addendum, October 9, 2017

23. Notice of the Seattle Department of Construction and Inspections Director's
Analysis and Decision, October 10, 2019

24. Hearing Examiner decision in W-05-001

25. Ordinance 122054 (full)

26. Ordinance 122235 (full)

27. Exhibits listed by Appellant or City. The Applicant has made efforts not to
duplicate exhibits listed by other parties but reserves the right to offer exhibits listed by any
party.

Applicant reserves the right to introduce additional exhibits for the purposes of rebuttal or
impeachment and to introduce additional exhibits to the extent allowed by the City Hearing
Examiner Rules.

DATED this 21st day of January, 2020.

s/G. Richard Hill, WSBA #8806
s/Courtney A. Kaylor, WSBA #27519
s/David P. Carpman, WSBA #54753
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