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7 BEFORE THE HEARING EXAMINER  
8 CITY OF SEATTLE

9 In the Matter of the Appeal of )  
10 ) Hearing Examiner File:  
11 TreePac Environmental Impact Review )  
12 (TEIR) and Greenwood Exceptional ) **W-21-007**  
13 Trees (GET) of the November 15, 2021 )  
14 Determination of Non-Significance by Brennon ) OPCDs REPLY TO APPELLANTS'  
Staley, Office of Planning and Community ) RESPONSE TO OPCDs MOTION TO  
Development. ) QUASH SUBPOENA OF JACQUELINE  
FAITH RAMOS  
\_\_\_\_\_)

15 **I. JACQUELINE FAITH RAMOS HAD NO INVOLVEMENT IN THE**  
16 **ENVIRONMENTAL REVIEW AT ISSUE IN THIS APPEAL**

17 Jacqueline Faith Ramos did not have any involvement in the environmental review of the  
18 Townhouse Reform Legislation ("Proposal") at issue in this appeal. Ms. Ramos's former role with  
19 SDCI has nothing to do with the environmental review of OPCD's current Proposal. Appellants  
20 claim that Ms. Ramos's former work with SDCI is relevant, but provide no rationale for why these  
21 old reports would provide any basis in the assessment of the environmental impacts of this Proposal  
22 compared to the current land use policies and regulations. Old reports generated in 2016/2017 have  
23 no relation to the current 2021 environmental review of the Proposal.

1       **II.       BRENNON STALEY HAS FAMILIARITY WITH THE FINDINGS OF THE**  
2       **REPORTS AND WOULD BE THE BEST PERSON TO TESTIFY AS TO THEIR**  
3       **RELATION TO THE REVIEW OF THIS PROPOSAL.**

4           Again, OPCD does not think that Ms. Ramos would have any relevant testimony to provide  
5 related to the environmental review of the Proposal. Also, Ms. Ramos's older reports speak for  
6 themselves. However, Brennon Staley, the lead planner who prepared the environmental checklist  
7 for this Proposal was aware of the findings of Ms. Ramos' reports. Brennon Staley learned about  
8 and became familiar with the processes, findings, and recommendations from Ms. Ramos's reports  
9 as they were the topic of a presentation that Mr. Staley attended. Mr. Staley had knowledge of the  
10 findings of the 2016/2017 reports when he analyzed the impacts of this Proposal and prepared the  
11 environmental checklist and would be in the best position to speak to how these reports factored  
12 into his environmental review of this Proposal, if at all.

13                               **III.       CONCLUSION**

14           Because of Ms. Ramos's lack of any involvement in the environmental review of this  
15 Proposal, and because her older reports from 2016/2017 have no relevance in the assessment of  
16 these proposed code amendments, the Hearing Examiner should deny Appellants' request to have  
17 her subpoenaed. Brennon Staley, who has familiarity with Ms. Ramos's older reports, would be the  
18 best person to testify as to how Ms. Ramos's reports were considered, if at all, as part of the  
19 environmental review of this Proposal.

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1 DATED this 15th day of February, 2022.

2 ANN DAVISON  
3 Seattle City Attorney

4 By: *s/Daniel B. Mitchell*, WSBA #38341  
5 Assistant City Attorney  
6 Seattle City Attorney's Office  
7 701 Fifth Ave., Suite 2050  
8 Seattle, WA 98104-7095  
9 Ph: (206) 684-8616  
10 Fax: (206) 684-8284  
11 Email: [daniel.mitchell@seattle.gov](mailto:daniel.mitchell@seattle.gov)  
12 *Attorneys for Respondent City of Seattle, Office of*  
13 *Planning & Community Development*  
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I also certify that on this date, a copy of the same document was sent via email to the following parties:

Dated this 15th day of February, 2022, at Seattle, Washington.

OPCDs REPLY TO APPELLANTS' RESPONSE TO  
OPCDs MOTION TO QUASH SUBPOENA - 4

**Ann Davison**  
Seattle City Attorney  
701 Fifth Ave., Suite 2050  
Seattle, WA 98104-7095  
(206) 684-8200