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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In Re: Appeal by

MASTER BUILDERS ASSOCIATION OF
KING AND SNOHOMISH COUNTIES,
LEGACY GROUP CAPITAL, LLC,
BLUEPRINT CAPITAL SERVICES, LLC, AA
ASHWORTH DEVELOPMENT LLC,
BLACKWOOD BUILDERS GROUP LLC,
AND BUILD SOUND, LLC,

of the SEPA Threshold Determination of Non-
Significance for the Tree Protections Update.

Hearing Examiner File: W-22-003

APPELLANTS' SUPPLEMENT TO
WITNESS LIST

COMES NOW the Appellants, who supplement their witness list as follows.

I. WITNESSES

1. Alan Haywood. Mr. Haywood has almost 40 years of experience. He received his Bachelor of Science in Horticulture from Washington State University. He also received training at the Pacific Northwest Maintenance Management School (National Recreation and Parks Association) and Community Tree Management Institute (Washington State Department of Natural Resources). Mr. Haywood maintains the following certifications: (a) Certified Arborist – Municipal Specialist PN 0330AM – ISA; (b) Certified

1 Professional Horticulturist 2332 – WSNLA; (c) Tree Risk Analysis Qualification – ISA; (d)
2 Public Pesticide Applicator License – 7627 WSDA; (e) Certified Parks and Recreation
3 Professional 55623 – NRPA; and (f) Integrated Pest Management Certificate – WSU. For
4 over 35 years, he previously worked for the City of Issaquah Parks and Recreation
5 Department, supervising the maintenance staff and projects, developing the annual work-
6 plan, and managing the division budget. He oversaw the Tree City USA program and
7 coordinated the landscape aspects of all city projects. He is expected to testify regarding the
8 facts of this case, the SEPA DNS, the current Tree Protection Ordinance, the proposed Tree
9 Protection Ordinance, and the City’s methodology for determining the number of
10 Exceptional Trees and Significant Trees that will be protected under the Proposed Tree
11 Protection Ordinance. Mr. Haywood is expected to testify for approximately 45 minutes.

12 **II. RESERVATION OF RIGHTS**

13 By identifying a particular witness or exhibit, Appellants do not concede, and
14 specifically reserve the right to object, that the same or similar witnesses and exhibits are not
15 relevant to the appeal issues and should not be considered by the Hearing Examiner or
16 admitted into evidence. Appellants also reserve the right to present additional witnesses and
17 exhibits and to elicit additional testimony from the witnesses listed herein to rebut, impeach,
18 and respond to testimony and exhibits presented by other parties in this matter.

19 Appellants further reserve the right to introduce any exhibit listed as an exhibit by
20 another party in this matter, to introduce illustrative exhibits and to utilize copies of code
21 and other provisions of law. Withdrawal of a listed witness or exhibit listed by another party
22 will not preclude appellants from calling that witness or utilizing that exhibit.

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Respectfully submitted this 9th day of June, 2022.

HELSELL FETTERMAN LLP

By: s/ Brandon S. Gribben
Brandon S. Gribben, WSBA No. 47638
Scott D. Johnson, WSBA No. 22956
Attorneys for Appellants