

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeals of

MBAKS, LEGACY GROUP,
BLUEPRINT CAPITAL

from a Determination of Non-Significance
issued by the Director, Seattle Department
of Construction and Inspections.

NO. W-22-003

Department Reference: 000268-22PN

TREPAC’S WITNESS AND
EXHIBIT LIST

TreePAC hereby submits its witness and exhibit lists for the above-captioned appeal.

I. WITNESSES

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

1. Steve Zemke. Steve Zemke is a member of TreePAC who may testify as a lay witness about basic facts and context relevant to the appeal. Mr. Zemke’s testimony may take approximately 15 minutes.

2. Tina Cohen. Ms. Cohen is an ISA Certified Arborist and has significant experience in her field. She may testify in response to the testimony of witnesses presented by Appellants regarding matters within her expertise. A copy of Ms. Cohen’s CV is included on TreePAC’s exhibit list. Ms. Cohen’s testimony may take approximately 30 minutes.

1 3. Peg Staeheli. Ms. Staeheli is a landscape architect with significant experience in her
2 field. She may testify in response to the testimony of witnesses presented by Appellants regarding
3 matters within her expertise. A copy of Ms. Staeheli’s CV is included on TreePAC’s exhibit list. Ms.
4 Staeheli’s testimony may take approximately 30 minutes.

6 4. All witnesses that are listed on Appellants’ Witness List (June 6, 2022).

7 TreePAC reserves the right to call any witness identified by any other party, to call
8 additional rebuttal witnesses, to call additional witnesses to the extent that it is allowed by the City
9 of Seattle Hearing Examiner Rules, and to call substitute witnesses if any of the witnesses identified
10 above become unavailable.

11 II. EXHIBIT LIST

12 TreePAC identifies the following exhibits it may use at the hearing in this matter. A
13 sharefile link to these documents is being provided to opposing counsel and the Hearing Examiner:
14

- 15 1. Chapter 25.11 – Tree Protection (current code language).
- 16 2. Director’s Rule 16-2008
- 17 3. SDCI Tip 242 – Tree Protection Regulations in Seattle
- 18 4. Urban Heat Islands – A Peek into Portland’s Shady History
- 19 5. Portland State Study
- 20 6. Seattle Forest Ecosystem Value
- 21 7. Heat Mapping Results Press Release
- 22 8. Annual Report – SDCI 2021
- 23 9. Tina Cohen CV
- 24 10. Peg Staeheli CV
- 25 11. Exhibits listed in Appellants’ Exhibit List
- 26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

In addition to the exhibits identified above, TreePAC reserves the right to introduce exhibits for illustrative purposes, exhibits identified by any other party, exhibits allowed by the City of Seattle Hearing Examiner Rules, and exhibits for cross-examination or rebuttal.

Dated this 10th day of June, 2022.

Respectfully submitted,

BRICKLIN & NEWMAN, LLP

By: 

Claudia M. Newman, WSBA No. 24928
Attorneys for TreePAC