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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE WASHINGTON

In the matter of the application of

SWEDISH MEDICAL CENTER  
CHERRY HILL

for approval of a Major Institution Master  
Plan for property located at 500 17<sup>th</sup>  
Avenue

In the matter of the appeals of:

WASHINGTON COMMUNITY ACTION  
NETWORK; 19<sup>TH</sup> AVE BLOCK WATCH;  
CHERRY HILL COMMUNITY COUNCIL;  
SQUIRE PARK COMMUNITY COUNCIL;  
PATRICK ANGUS, et al.; and  
CONCERNED NEIGHBORS OF SWEDISH  
CHERRY HILL

From a SEPA Decision by the Director,  
Department of Planning and Development

CF 311936

FILE NOS.

MUP-15-010 (W)

MUP 15-011 (W)

MUP 15-012(W)

MUP 15-013(W)

MUP 15-014(W)

MUP 15-015(W)

DPD # 3012953

WASHINGTON COMMUNITY  
ACTION NETWORK'S WITNESS  
AND EXHIBIT LIST FOR ITS SEPA  
APPEAL

Pursuant to the Hearing Examiner's Pre-Hearing Order dated April 30, 2015, appellant  
Washington Community Action Network (Washington CAN) hereby submits its exhibit and  
witness lists for its SEPA appeal.

I. WITNESS LIST

Appellant Washington CAN may call the following witnesses to testify at the SEPA appeal hearing:

1. Ross Tilghman, Tilghman Group.

Mr. Tilghman will testify that the FEIS issued by the Department of Planning and Development for the Swedish Medical Center Cherry Hill Campus Master Plan Project was inadequate with respect to traffic and transportation impacts. Specifically, he will testify that the FEIS failed to adequately disclose and analyze the significant adverse impacts and potential mitigation related to traffic and transportation. He is also expected to testify about the FEIS's failure to adequately analyze inconsistencies with SMC 25.05.675 regarding traffic and transportation.

2. Sharon Sutton, Ph.D., FAIA.

Dr. Sharon Sutton will testify that the FEIS issued by the Department of Planning and Development for the Swedish Medical Center Cherry Hill Campus Master Plan Project was inadequate with respect to the impacts related to land use; the proposal's relationship to plans, policies, and regulations concerning land use; and aesthetics, including height, bulk, and scale of the project. Dr. Sutton will testify that the EIS analysis and disclosure related to inconsistencies of the project with the SEPA policies in SMC 25.05.675 was inadequate. She will provide detail on how the FEIS incorrectly concludes that the Master Plan is consistent with policies and goals in the Comprehensive Plan, including the Urban Villages Element goals and policies and the Land Use Element goals and policies.

Appellant reserves the right to call any witness identified by any other party, to call rebuttal witnesses, to call additional witnesses to the extent that it is allowed by the City of

1 Seattle Hearing Examiner Rules, and to call substitute witnesses if any of the witnesses identified  
2 above become unavailable.

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4 II. EXHIBIT LIST

5 Appellant Washington CAN identifies the following exhibits it may use at the SEPA  
6 hearing in this matter:

- 7 1. Curriculum Vitae of Ross Tilghman.  
8 2. Curriculum Vitae of Sharon Sutton, Ph.D., FAIA.

9 In addition to the exhibits identified above, appellant Washington CAN reserves the right  
10 to introduce exhibits identified by any other party, to introduce additional exhibits as allowed by  
11 the City of Seattle Hearing Examiner Rules, and to introduce additional exhibits during cross  
12 examination or rebuttal.

13 Dated this 12<sup>th</sup> day of June, 2015.

14  
15 Respectfully submitted,

16 BRICKLIN & NEWMAN, LLP

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18 By: 

19 Claudia M. Newman, WSBA No. 24928  
20 Attorneys for Appellant Washington CAN  
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