

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

RECEIVED BY

19TH Ave Block Watch/Squire Park
Neighbors

Appeal of DPD EIS

File No. MUP 15-0205 MUP-6-0110: 44

DPD # 3012953
OFFICE OF
HEARING EXAMINER
Swedish Medical Center - University Campus
Master Plan - 500 17th Ave*Amended Appellant's Motion to Exclude
Applicants' Expert Testimony*

The Applicants submitted an amended witness list on June 29, 2015. The Applicants have identified John Perlic, P.E., Parametrix, Inc., to testify regarding traffic and transportation issues and have stated Mr. Perlic's resume is forthcoming and will be provided at an undisclosed future date. The Appellant would not oppose accepting Applicants' late modified witness list and receiving Mr. Perlic's extremely late resume some day.

However, in light of the Applicants' motion to exclude specific Appellants' expert witnesses from consideration for a variety of stated reasons and opinions, including Mr. Richter and Ms. Amtmann, who Applicants claim is no expert but feel compelled to depose anyway and whose qualifications were submitted as found through public record to meet the deadline, we must ask for equitable consideration.

Again, we must state that the Appellant's desire is to allow *all* the experts and witnesses to testify. However, should the Hearing Examiner consider excluding Appellant's expert witnesses, then we must ask that Mr. Perlic also be excluded because:

- He was not identified by June 12, 2015 when the final list of witnesses and exhibits were to be provided to all parties.
- It is July 2, 2015 and the Applicants have yet to produce Mr. Perlic's resume.
- The Applicants have produced six other witnesses to speak on the same or similar topics as Mr. Perlic and it is unclear how seven witnesses will provide more assistance than four, five or six witnesses in understanding the evidence or determining an issue of fact concerning traffic and transportation.

Should the Hearing Examiner consider excluding Appellant's expert witnesses, then we also must ask that Jessica Szilag and Mike Rimoin not be considered experts and any testimony as experts be excluded from these proceedings and Ms. Szilag and Mr. Rimoin can testify as interested third parties during the MIMP portion only. The Applicants submitted brief descriptions of Ms. Szilag and Mr. Rimoin that lack any education or experience credentials other than their current employment with Commute Seattle and their enthusiastic bicycle commuting to work. Their bios provide less information than any of the Appellant experts that Applicants are challenging with their motion. Their resumes are submitted with this motion.

Since David Markley has been withdrawn as an expert, Appellant with make no motion for Mr. Markley's withdrawal as an expert.

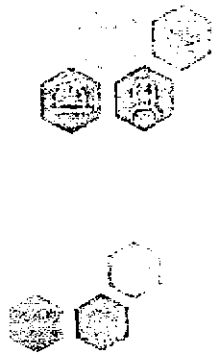
BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

19th Ave Block Watch is appreciative for the opportunity provided by the Hearing Examiner to allow our voices to be heard through this administrative appeal process.

Thank you.

Vicky Schiantarelli

Vicky Schiantarelli
vickymatsui@hotmail.com



Our Team

- Who We Are
- >
- Our Team



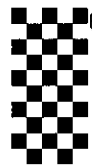
Jessica Szelag | Executive Director

Jessica joined Commute Seattle in 2009 and became Executive Director in November 2013. As the face of our organization, Jessica is the critical interface between our private and public sector partners, ensuring that DSA, Seattle DOT, and King County Metro work seamlessly together to integrate planning and service delivery and keep Downtown Seattle economically competitive. Jessica spends (almost all of!) her spare time climbing, backcountry skiing, trail running, and cycling. Jessica is deeply interested in bike policy, having served on both the Seattle Bicycle Advisory Board and the Cascade Bicycle Club board. Jessica lives in Phinney Ridge and commutes by bike or RapidRide E.



Mike Rimoin | Business Development Manager

Mike joined Commute Seattle in 2010. Mike has created Commute Seattle's consulting programs from the ground up, expertly advising Downtown employers and property owners on best practices in parking pricing, bike parking, transit benefit programs, LEED Certification, relocation analysis, and more. Mike also serves on the board of the Seattle 2030 District. When not working, Mike has exercised a broad array of talents and interests, from owning a crêperie in Vermont to building biogas digesters to playing keys in various local bands. Mike lives Downtown and bikes to work on 'the minivan', his tricked out electric cargo bike.



**BEFORE THE HEARING EXAMINER
CITY OF SEATTLE**

**19TH Ave Block Watch/Squire Park
Neighborhood**

File No. MUP 15-010 - MUP 15-015

* * * ERROR REPORT (JUL. 6. 2015 7:43AM) * * *

FAX HEADER:

FILE	PERSONAL NAME	ADDRESS	MODE	TIME	PAGE	RESULT
952		206 860 6920	RED	0'56"	P. 1	E

PAGE NOT RECEIVED

QUICK SERVICE CODE

P. 1

00-01

: BATCH
L : SEND LATER
D : DETAILC : CONFIDENTIAL
@ : FORWARDING
F : FINEP : POLLING
E : ECMM : MEMORY TX
S : STANDARD