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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In the Matter of the Appeal of  
  
DOWNTOWN RESIDENTS ALLIANCE  
  
from a SEPA Threshold Determination of  
Nonsignificance by the Director, Office of  
Planning and Community Development

NO. W-16-005  
  
DOWNTOWN RESIDENTS  
ALLIANCE'S PRELIMINARY  
WITNESS AND EXHIBIT LIST

Pursuant to the Hearing Examiner's Pre-Hearing Order dated July 20, 2016, appellant  
Downtown Residents Alliance hereby submits its preliminary exhibit and witness lists.

I. WITNESSES

Appellant Downtown Residents Alliance may call the following witnesses to testify at the  
SEPA appeal hearing:

- 1. Ross Tilghman, Tilghman Group.

Mr. Tilghman will testify as an expert about traffic, transportation, safety, and public  
facilities impacts of the proposal. We anticipate that his direct testimony will take approximate one  
and a half hours.

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2. Peter Steinbrueck, FAIA.

Mr. Steinbrueck will testify as an expert about impacts related to land use; the proposal's relationship to plans, policies, and regulations; privacy; light; livability; and aesthetics, including height, bulk, and scale of the proposal. We anticipate that his direct testimony will take approximately one and a half hours.

3. John Sosnowy, Escala Resident.

Mr. Sosnowy will testify as a lay witness about impacts related to land use; the proposal's relationship to plans, policies, and regulations; privacy; light, livability; and aesthetics, including height, bulk, and scale of the proposal. We anticipate that his direct testimony will take approximately one hour.

Appellant may add at least one additional lay witness to testify to issues related to privacy and light impacts and at least one additional expert witness to address impacts related to land use, privacy, light and health impacts in its final witness list. Those additional witnesses may add approximately two hours of direct testimony to Appellant's opening case.

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 Seattle Hearing Examiner Rules, and to call substitute witnesses if any of the witnesses identified above become unavailable. Appellant also reserves the right to call records custodians to verify the authenticity of records, if necessary.

II. EXHIBITS

Appellant Downtown Residents Alliance identifies the following exhibits it may use at the SEPA hearing in this matter:

1. Curriculum Vitae of Ross Tilghman.

- 1 2. Curriculum Vitae of Peter Steinbrueck, FAIA.
- 2 3. SEPA Threshold Determination for the Increases in Development Capacity and
- 3 Related MHA Implementation in Downtown and SLU (May 27, 2016).
- 4 4. MHA Urban Design Study (June 2016).
- 5 5. MHA Transportation Study (May 2016).
- 6 6. Summary of SEPA Draft Proposal (June 2016).
- 7 7. Director's Report on MHR-R Legislation (May 2016).
- 8 8. Letter from David D. Markley, Transportation Solutions, Inc. to Second Avenue
- 9 Condominium Owners dated (March 9, 2016).
- 10 9. DEIS, South Lake Union Height and Density Alternatives (2011).
- 11 10. Seattle Comprehensive Plan (relevant excerpts).
- 12 11. Rebuttal to Developer Pushbacks on Height vs. Girth to Fund HALA (March 16,
- 13 2016).
- 14 12. Ordinance MHA DTSLU Implementation, SEPA Draft.
- 15 13. Babadjanov, Anton, *Natural Light in Buildings: NIMB Rhetoric or Livability Staple*
- 16 (May 20, 2016).
- 17 14. Escala Alley Issues, Power Point (May, 2016).
- 18 15. DEIS for Downtown Height and Density Changes (Nov. 2003).
- 19 16. DEIS for Livable South Downtown Planning (Nov. 2007).
- 20 17. Downtown Site Consolidation Map.
- 21 18. Letter from Claudia M. Newman to John Shaw (March 21, 2016) (with attachments).
- 22 19. Letter from Claudia M. Newman to Seattle DCI (Feb. 19, 2016).
- 23 20. PSRC 2014 Housing Survey.

1 In addition to the exhibits identified above, appellant Downtown Residents Alliance reserves  
2 the right to introduce exhibits identified by any other party, to introduce additional exhibits as  
3 allowed by the City of Seattle Hearing Examiner Rules, and to introduce additional exhibits during  
4 cross examination or rebuttal.

5 Dated this 17<sup>th</sup> day of August, 2016.

6  
7 Respectfully submitted,

8 BRICKLIN & NEWMAN, LLP

9  
10 By: 

11 Claudia M. Newman, WSBA No. 24928  
12 Attorneys for Appellant  
13 Downtown Residents Alliance  
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