

BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

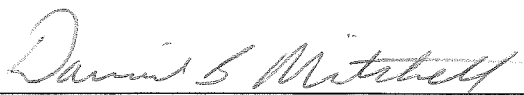
In the Matter of the Appeal of:) Hearing Examiner File: **MUP-17-015**
)
PROTECT VOLUNTEER PARK,)
) Department Reference: 3024753
)
of a Determination of Non-Significance)
Certificate of Approval issued by the) SDCI'S RESPONSE TO APPELLANT'S
Department of Construction and Inspections) MOTION FOR SUMMARY JUDGMENT
For Construction in Volunteer Park)
)

In response to the Appellant's summary judgment motion, the Seattle Department of Construction and Inspections ("SDCI") relies on the arguments it presented in its own Motion for Summary Judgment filed on May 1, 2017. SDCI focused on the longstanding environmental policy in effect in Seattle for nearly thirty years: For projects involving structures or sites which have been designated as historic landmarks, compliance with the Landmark Preservation Ordinance ("LPO") shall constitute compliance with the City's policy to maintain and preserve significant historic structures and sites. See SMC 25.09.675.H.2.b.

DATED this 15th day of May 2017.

PETER S. HOLMES
Seattle City Attorney

By:


DANIEL B. MITCHELL, WSBA #38341
Assistant City Attorney
*Attorneys for Respondent Seattle Department of
Construction and Inspections*

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury under the laws of the State of Washington that on this date, I caused to be served a true and correct copy of the foregoing document, **SDCI's Response to Appellant's Motion for Summary Judgment**, on the parties listed below and in the manner indicated:

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the foregoing being the last known address of the above-named party.

DATED this 15th day of May, 2017, at Seattle, Washington


ALICIA REISE, Legal Assistant