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5	BEFORE THE HEARING EXAMINER CITY OF SEATTLE				
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7	In the Matter of the Appeal of:	Hearing Examiner File			
8	THE BALLARD COALITION	W-17-004			
9	Of the adequacy of the Final Environmental	CASCADE BICYCLE CLUB PRELIMINARY LIST OF WITNESSES			
10	Impact Statement, prepared by the Seattle Department of Transportation for the Burke-	AND EXHIBITS			
11	Gilman Trail Missing Link Project,				
12	Appellants.				
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15	The Cascade Bicycle Club ("CBC") submits the following preliminary list of witnesses				
16	and exhibits. Because these are preliminary lists, CBC has not made a final determination of th				
17	witnesses it may call or the exhibits it may present at hearing. In particular, CBC is defending				
18	against claims raised by Appellant Ballard Coalition ("Appellant"). At this stage in the				
19	proceeding, CBC's understanding of Appellan	nt's claims and CBC's responsive witness and			
20	exhibit lists are based on preliminary informat	tion currently available to CBC, including			
21	Appellant's notice of appeal. CBC reserves the right to amend, refine, or expand its lists as				
22	Appellant develops its claims and following completion of discovery.				
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PRELIMINARY WITNESSES

CBC's preliminary witness list is set forth below. If for any reason, any of the listed
witnesses becomes unavailable for hearing, CBC reserves the right to substitute another witness
with similar qualifications, expertise, or familiarity with the issues on review. CBC may decide not
to call one or more witnesses listed, if determined not to be necessary after the presentation of
Ballard Coalition's case in chief, and CBC reserves the right to add or delete any witnesses at the
time it submits its final witness list or as otherwise authorized by the Hearing Examiner. Finally,
CBC reserves the right to call rebuttal witnesses who are not listed below and to call as a witness
any of the witnesses listed by the other parties. Any of the potential witnesses identified may be
contacted through CBC's attorneys.

- 1. Blake Trask, Senior Policy Director of the Cascade Bicycle Club. Mr. Trask will testify regarding CBC's interest in timely completion of the Project, the need to design the Project to accommodate the needs of a broad range of non-motorized users, current traffic levels and safety conditions for bicyclists and pedestrians in the vicinity of the Project under the nobuild alternative, the safety benefits of the Project and the safety impacts of delays in completion of the Project, and rebuttal to the testimony offered by the Ballard Coalition.
- 2. Jean White, long-time bicyclist and bike commuter, resident of North Seattle, and Government Relations Administrator for King County Parks Trails Program. Ms. White will testify to the current safety conditions of bicycling for recreation and commuting purposes in the area of the Project under the no-build alternative, and the potential safety improvements that will result from the Project. Note: Ms. White will testify as an individual, not as a representative of

King County.

1	3.	Casey Gifford, co-chair of the Seattle Bicycle Advisory Board, Transportation			
2	Planner at Seattle Children's Hospital, former Commute Information Strategy Specialist at the				
3	University of Washington Transportation Services. Ms. Gifford will testify to the safety of				
4	bicycle and pedestrian commuting through Ballard due to current safety issues in the area of the				
5 6	Missing Link Project under the no-build alternative, the importance of the connected regional				
7	trail system, and the potential safety improvements that will result from the Project.				
8	4.	Other witnesses as determined after review of information provided in response to			
9	discovery requests promulgated to the Ballard Coalition.				
10	5.	Witnesses listed on the preliminary and final witness lists of the other parties.			
11	6.	Witnesses in rebuttal to evidence introduced by the Ballard Coalition. As			
12	indicated above, CBC reserves the right to call additional expert witnesses to rebut Appellant's				
13 14	evidence and claims that are disclosed through discovery or that Appellant advances at hearing.				
15		PRELIMINARY EXHIBITS			
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17	CBC reserves the right to submit a final list consistent with the case schedule that adds or				
18	deletes any exhibits identified herein. Additionally, CBC reserves the right to: (1) offer any				
19	document produced by any party during discovery; (2) offer any exhibit identified by another				
20	party; (3) offer any rebuttal exhibits as allowed by the Hearing Examiner; and, (4) offer				
21	illustrative exhibits.				
22	1.	Comments of the Cascade Bicycle Club on the Draft Environmental Impact			
23	Statement;				
24	2.	Washington State Bicycle and Pedestrian Documentation Project data from 2011-			
25	2016 for the 17th and Shilshole count location;				
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1	3. Bicycle traffic flow data from Strava Metro related to the Project area;
2	4. Photographs of Burke Gilman Trail;
3	5. Photographs of the Project area; and
4	6. The Draft and Final Environmental Impact Statements for the Burke-Gilman
5	Missing Link Project, and all technical appendices.
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9	Dated this 8th day of September, 2017.
10	STOEL RIVES LLP
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CERTIFICATE OF SERVICE 1 2 I certify that on this date of September 8, 2017, I electronically filed a copy of the 3 foregoing document with the Seattle Hearing Examiner using its e-filing system. I also certify 4 that on this date I caused to be served a true and correct copy of the foregoing on the following 5 persons in the manner listed below: 6 Joshua C. Brower Via U.S. 1st Class Mail П 7 Danielle N. Granatt ☑ Via E-mail Leah B. Silverthorn iosh@verislawgroup.com 8 Veris Law Group PLLC danielle@verislawgroup.com 1809 Seventh Ave., Suite 1400 leah@verislawgroup.com 9 Seattle, WA 98101 megan@verislawgroup.com 10 Tel: 206-829-9590 Via Fax Fax: 206-829-9245 Via Overnight Delivery 11 Attorneys for Plaintiff/Petitioner 12 The Appellant Coalition 13 Patrick J. Schneider Via U.S. 1st Class Mail 14 Foster Pepper PLLC ☑ Via E-mail 1111 3rd Ave., Suite 3000 pat.schneider@foster.com 15 Seattle, WA 98101-3292 brenda.bole@foster.com Tel: 206-447-2905 Via Fax 16 Fax: 206-749-1915 Via Overnight Delivery 17 Attorneys for Plaintiff/Petitioner 18 The Appellant Coalition 19 Erin E. Ferguson Via U.S. 1st Class Mail П Asst. Seattle City Attorney ☑ Via E-mail 20 Land Use Section - Civil Division erin.ferguson@seattle.gov Office of the Seattle City Attorney 21 alicia.reise@seattle.gov 701 Fifth Ave., Suite 2050 Via Fax П 22 Seattle, WA 98104-7097 Via Overnight Delivery Tel: 206-684-8615 23 Attorney for Defendant 24 City of Seattle Department of Transportation 25

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5	Attorneys for Defendant	☐ Via Overnight Delivery				
	City of Seattle	Ş				
6	,					
7	I certify under penalty of perjury under the laws of the state of Washington that the					
8	foregoing is true and correct.					
9	DATED: September 8, 2017 at Seattle, Wash	ington.				
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11		Sharman D. Loomis, Practice Assistant	<u> </u>			
12		STOEL RIVES LLP				
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