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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

Hearing Examiner File

THE BALLARD COALITION

W-17-004

of the adequacy of the Final Environmental Impact Statement, prepared by the Seattle Department of Transportation for the Burke Gilman Trail Missing Link Project

THE BALLARD COALITION'S
PRELIMINARY DISCLOSURE OF
WITNESSES AND EXHIBITS

The Ballard Coalition submits the following preliminary witness and exhibit list:

I. EXPERT WITNESSES

1. Victor H. Bishop, P.E., Traffic Engineer, VHB Consulting, PLLC. Mr. Bishop may testify regarding the adequacy of the Final EIS for the proposed extension of the Burke-Gilman Trail (the Missing Link) through the Ballard maritime and industrial area on the following topics and subjects, including, without limit: alternatives considered and not considered in the DEIS and FEIS, autoTURN, bicycle facilities, business impacts, cumulative impacts, cycle tracks, Federal, State and local design standards and regulations, level/percent design used in the EIS and generally in SEPA, parking loss and impacts, the Preferred Alternative, driveways, protected bicycle facilities, right of way standards, safety, sight distance

1 issues, traffic hazards, trail costs, trucks, and trail development. Although a copy of Mr.
2 Bishop's resume was previously provided and admitted into the Record as Hearing Examiner
3 Exhibit 11 an updated copy is attached.

4 2. Claudia S. Hirschey, P.E., Senior Transportation Engineer. Ms. Hirschey may
5 testify regarding the adequacy of the Final EIS for the proposed extension of the Burke-Gilman
6 Trail (the Missing Link) through the Ballard maritime and industrial area on the following topics
7 and subjects, including, without limit: alternatives considered and not considered in the DEIS
8 and FEIS, autoTURN, bicycle facilities, business impacts, conflicts, conceptual design and its
9 relationship to SEPA, cumulative impacts, cycle tracks, Federal, State and local design standards
10 and regulations, project design level/percent design used in the EIS and generally in SEPA,
11 parking loss and impacts, the Preferred Alternative, driveways, driveway counts, driveway
12 usage, protected bicycle facilities, right of way standards, safety, safety analysis, sight distance
13 issues, traffic hazards, traffic hazard analysis, trail costs, trucks, and trail development. A copy
14 of Ms. Hirschey's resume is attached.

15
16
17 3. Barry S. Knight, P.E. Mr. Knight may testify regarding his work and opinion
18 related to the design and constructability of an elevated structure to be used as a multi-use path
19 for the Missing Link within a portion of the "study area" as that term is defined in the FEIS, and
20 the approximate cost to do so.¹ A copy of Mr. Knight's resume is attached.
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¹ Mr. Knight is hereby also designated as a fact Witness and will not be listed below to avoid repetition.

1 4. Scott O. Kuznicki, PE, Director of Safety and Mobility Solutions, transpogroup. Mr.
2 Kuznicki may testify regarding his work and opinion related to performing autoTURN analysis
3 for driveways along the Missing Link, the DEIS and the FEIS.²

4 II. WITNESSES

5 1. Paul Nerdrum, Salmon Bay Sand & Gravel, Co. Mr. Nerdrum may testify
6 regarding impacts to his businesses and properties arising from the project, including, without
7 limit: traffic-hazards, traffic delays, safety impacts, safety concerns, traffic hazard concerns,
8 access impacts, economic impacts to his business and properties, impacts to the use and
9 maintenance of his properties, compatibility of the project with land uses that are unique to ,
10 cumulative impacts, parking, the segment of the Burke-Gilman Trail located adjacent to and in
11 front of his businesses and properties and to Ballard in general;

12 2. Warren Aakervik, Ballard Oil Company. Mr. Aakervik may testify regarding
13 impacts to his businesses and properties arising from project, including, without limit: traffic-
14 hazard impacts, traffic delays, safety impacts, safety concerns, traffic hazard concerns, access
15 impacts, parking impacts, impacts to the use and maintenance of his properties; economic
16 impacts to his business and surrounding land uses; compatibility with land uses that are unique to
17 the segment of the Burke-Gilman Trail located adjacent to and in front of his businesses and
18 properties and to Ballard in general; freight mobility in Seattle; the maritime industrial economic
19 sector in Seattle; and how roadway design impacts his business and freight mobility in general.

20 3. Scott Anderson, CSR Marine. Mr. Anderson may testify regarding impacts to his
21 businesses and property arising from the project, including, without limit: traffic-hazards, traffic
22

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24
25 ² Mr. Kuznicki is hereby also designated as a fact Witness and will not be listed below to avoid repetition.

1 delays, safety impacts, traffic hazard impacts, safety concerns, access impacts, impacts to the use
2 and maintenance of CSR's property, business and economic impacts to CSR, and compatibility
3 of the Missing Link with land uses that are unique to the segment of the Burke-Gilman Trail
4 located adjacent to and in front of CSR and to Ballard in general.

5
6 4. Nigel Barron, CSR Marine, Service Coordinator. Mr. Barron may testify
7 regarding impacts to CSR and its property arising from the project, including, without limit:
8 traffic-hazards, traffic delays, safety impacts, traffic hazard impacts, safety concerns, access
9 impacts, impacts to the use and maintenance of CSR's property, business and economic impacts
10 to CSR, and compatibility of the Missing Link with land uses that are unique to the segment of
11 the Burke-Gilman Trail located adjacent to and in front of CSR and to Ballard in general.

12
13 5. Mike Walker, Teamsters Union Local No. 174, Business Agent. Mr. Walker may
14 testify regarding project-induced impacts including, without limit: impacts to Teamster Local
15 174 union members, Teamsters drivers, and union employment arising from traffic-hazards,
16 safety impacts, lost parking and parking changes, construction, safety concerns, traffic hazard
17 concerns, access, use and maintenance of properties where union members are employed, and
18 compatibility with land uses that are unique to the segment of the Burke-Gilman Trail located
19 along the route of drivers and other members of his union.

20
21 6. Nicole Grant, Executive Secretary-Treasurer, the Martin Luther King, Jr. County
22 Labor Council of Washington, AFL-CIO. Ms. Grant may testify regarding project-induced
23 impacts to member unions and member union's members, including, without limit: economic
24 and business related impacts, employment impacts, business operation impacts, land use impacts,
25 safety concerns, traffic hazard concerns, the Preferred Alternative, other alternatives, trail usage,

1 lost parking and parking changes, construction related impacts, access concerns, use and
2 maintenance of properties on which businesses employing union members are located,
3 cumulative impacts, and compatibility with land uses that are unique to this area of Ballard and
4 to Seattle in general.

5
6 7. Katie Garrow, Deputy Executive Secretary-Treasurer the Martin Luther King, Jr.
7 County Labor Council of Washington, AFL-CIO. Ms. Garrow may testify regarding project-
8 induced impacts to member unions and member union's members, including, without limit:
9 economic and business related impacts, employment impacts, business operation impacts, land
10 use impacts, safety concerns, traffic hazard concerns, the Preferred Alternative, other
11 alternatives, trail usage, lost parking and parking changes, construction related impacts, access
12 concerns, use and maintenance of properties on which businesses employing union members are
13 located, cumulative impacts, and compatibility with land uses that are unique to this area of
14 Ballard and to Seattle in general.

15
16 8. Craig Hatton, Hatton Engine & Generator Systems, Inc. Mr. Hatton may testify
17 regarding impacts to Hatton and its property arising from the project, including, without limit:
18 traffic-hazards, traffic delays, safety impacts, traffic hazard impacts, safety concerns, access
19 impacts, impacts to the use and maintenance of CSR's property, business and economic impacts
20 to Hatton, and compatibility of the Missing Link with land uses that are unique to the segment of
21 the Burke-Gilman Trail located adjacent to and in front of Hatton and its properties and to
22 Ballard in general.

23
24 9. Ellen Hatton, Hatton Engine & Generator Systems, Inc. Mrs. Hatton may testify
25 regarding impacts to Hatton and its property arising from the project, including, without limit:

1 traffic-hazards, traffic delays, safety impacts, traffic hazard impacts, safety concerns, access
2 impacts, impacts to the use and maintenance of CSR's property, business and economic impacts
3 to Hatton, and compatibility of the Missing Link with land uses that are unique to the segment of
4 the Burke-Gilman Trail located adjacent to and in front of Hatton and its properties and to
5 Ballard in general.

6
7 10. James Forgette, Manager, Ballard Terminal Railroad Co. Mr. Forgette may testify
8 regarding impacts to BTRR, its operation and its rail line arising from the project, including,
9 without limit: traffic-hazards, traffic delays, safety impacts, traffic hazard impacts, safety
10 concerns, access impacts, impacts to the use and maintenance of BTRR's rail line and easement,
11 business and economic impacts to BTRR, and compatibility of the Missing Link with land uses
12 that are unique to the segment of the Burke-Gilman Trail located adjacent to BTRR and its
13 railroad tracks and right-of-way and to Ballard in general.

14
15 11. Sue Dills, Commercial Marine Construction Co. Ms. Dills may testify regarding
16 impacts to her company and its properties arising from the project, including, without limit:
17 traffic-hazards, traffic delays, safety impacts, traffic hazard impacts, safety concerns, sight
18 distance concerns, access impacts, impacts to the use and maintenance of Ms. Dill's company's
19 properties and the business located at those properties, the economic and land-use related
20 impacts to her company, and compatibility of the Missing Link with land uses that are unique to
21 the segment of the Burke-Gilman Trail located adjacent to and in front of her company's
22 properties and to Ballard in general.

23
24 12. Peter Schrappen, Director of Government Affairs, Northwest Marine Trade
25 Association. Mr. Schrappen may testify regarding project-induced impacts, including, without

1 limit: to NMTA's members and their businesses and properties arising from traffic-hazards,
2 safety impacts, lost parking and parking changes, incompatible land uses, impacts to water-
3 related and water-dependent businesses, safety concerns, access impacts, use and maintenance of
4 properties owned or operated by NMTA members, and compatibility with land uses that are
5 unique to the segment of the Burke-Gilman Trail located in Ballard and Seattle in general.
6

7 13. Mara Garrity, Ballard Massage Center. Ms. Garrity may testify regarding project-
8 induced impacts, including, without limit: access to and from Ballard Mill Marina and other
9 marinas located near or adjacent to the Preferred Alternative, impacts to individuals who live-
10 aboard boats and vessels at these marinas, impacts to the local live-aboard community in general,
11 safety impacts, traffic hazard impacts, safety concerns, access impacts and concerns and land use
12 compatibility impacts,
13

14 14. Timothy Olstad, Dispatcher and CDL, Salmon Bay Sand & Gravel Co. Mr.
15 Olstad may testify regarding project-induced impacts, including, without limit: access,
16 driveways, safety concerns, traffic hazards, traffic hazard concerns, traffic delays, access delays,
17 vehicle operations, alternatives, business impacts, land use impacts, lost parking and parking
18 changes, construction related impacts, access to/from, use and maintenance of SBS&G
19 properties, conflicts with cyclists and trail users, and compatibility of the Missing Link with land
20 uses that are unique to the segment of the Burke-Gilman Trail located adjacent to and in front of
21 SBS&G and its properties.
22

23 15. Bill Herzberg, CDL, Teamster and Commercial Truck Driver. Mr. Herzberg may
24 testify regarding project-induced impacts, including, without limit: access, driveways, safety
25 concerns, traffic hazards, traffic hazard concerns, traffic delays, access delays, vehicle

1 operations, alternatives, business impacts, land use impacts, lost parking and parking changes,
2 impacts from impaired access to/from SBS&G properties, conflicts with cyclists and trail users,
3 and compatibility of the Missing Link with land uses that are unique to the segment of the
4 Burke-Gilman Trail located adjacent to and in front of SBS&G and its properties.

5
6 16. Brian McGarvey, avid cyclist. Mr. McGarvey may testify, without limit, his
7 experience and knowledge regarding cycling in Seattle on sharrows, marked lanes, protected
8 bicycle facilities, mixed-use trails, and in industrial areas; safety and traffic hazard experiences
9 and concerns related to his experiences and knowledge biking in these areas/on these types of
10 facilities, and issues and concerns related to driveways, industrial and commercial traffic,
11 vehicles, traffic, traffic hazards and conflicts between cyclists, trail users and heavy industrial
12 vehicles and traffic.

13
14 17. Mason Williams, Covich Williams. Mr. Williams may testify regarding impacts
15 to his business and property arising from project-induced traffic-hazards, safety impacts, lost
16 parking and parking changes, construction related impacts, safety concerns, access, use and
17 maintenance of property, and compatibility with land uses that are unique to the segment of the
18 Burke-Gilman Trail located adjacent to and in front of his business and property.

19
20 18. Scott Kubly, Seattle Department of Transportation, Director. Mr. Kubly may be
21 asked about SDOT's process to scope, choose alternatives, and complete the Draft
22 Environmental Impact Statement and Final Environmental Impact Statement and the contents,
23 analysis and conclusions in the DEIS and FEIS.

24
25 19. Mark Mazzola, Seattle Department of Transportation, Project Manager. Mr.
Mazzola may be asked about SDOT's process to scope, choose alternatives, and complete the

1 Draft Environmental Impact Statement and Final Environmental Impact Statement, working with
2 SDOT's consultants, the community, comments, and the contents, analysis and conclusions in
3 the DEIS and FEIS.

4 20. Ron Scharf, Seattle Department of Transportation, Senior Project Manager. Mr.
5 Scharf may be asked about SDOT's process to scope, choose alternatives, and complete the Draft
6 Environmental Impact Statement and Final Environmental Impact Statement, working with
7 SDOT's consultants, the community, comments, and the contents, analysis and conclusions in
8 the DEIS and FEIS.

9
10 21. Jill Macik, City of Seattle. Ms. Macik may be asked about SDOT's process to
11 scope, choose alternatives, and complete the Draft Environmental Impact Statement and Final
12 Environmental Impact Statement, working with SDOT's consultants, the community, comments,
13 revising and finalizing the DEIS and FEIS, and the contents, analysis and conclusions in the
14 DEIS and FEIS.

15
16 22. Art Brochet, City of Seattle. Mr. Brochet may be asked about SDOT's process to
17 scope, choose alternatives, and complete the Draft Environmental Impact Statement and Final
18 Environmental Impact Statement, working with SDOT's consultants, the community, comments,
19 revising and finalizing the DEIS and FEIS, and the contents, analysis and conclusions in the
20 DEIS and FEIS.

21
22 23. Mark Johnson, Environmental Science Associates. Mr. Johnson may be asked
23 about his expertise, his work, work-product, management, participation, findings, and SDOT's
24 process to the draft and complete the DEIS and FEIS, including, without limit, working with
25

1 SDOT, the community, comments, and the contents, analysis and conclusions in the DEIS and
2 FEIS.

3 24. Erinn Ellig, Parametrix. Ms. Ellig may be asked about her expertise, her work,
4 work-product, participation, findings, and SDOT's process to the draft and complete the DEIS
5 and FEIS, including, without limit, working with SDOT, the community, comments, and the
6 contents, analysis and conclusions in the DEIS and FEIS or any portion thereof.
7

8 25. Jennifer Hagenow, Environmental Science Associates. Ms. Hagenow may be
9 asked about her expertise, her work, work-product, participation, findings, and SDOT's process
10 to the draft and complete the DEIS and FEIS, including, without limit, working with SDOT, the
11 community, comments, and the contents, analysis and conclusions in the DEIS and FEIS or any
12 portion thereof.
13

14 26. Claire Hoffman, Environmental Science Associates. Ms. Hoffman may be asked
15 about her expertise, her work, work-product, participation, findings, and SDOT's process to the
16 draft and complete the DEIS and FEIS, including, without limit, working with SDOT, the
17 community, comments, and the contents, analysis and conclusions in the DEIS and FEIS or any
18 portion thereof.

19 27. Morgan Shook, ECONorthwest. Mr. Shook may be asked about his expertise, his
20 work, work-product, participation, findings, and SDOT's process to the draft and complete the
21 DEIS and FEIS, including, without limit, working with SDOT, the community, comments, and
22 the contents, analysis and conclusions in the DEIS and FEIS or any portion thereof.
23

24 28. Jeffrey Ferris, ECONorthwest. Mr. Ferris may be asked about his expertise, his
25 work, work-product, participation, findings, and SDOT's process to the draft and complete the

1 DEIS and FEIS, including, without limit, working with SDOT, the community, comments, and
2 the contents, analysis and conclusions in the DEIS and FEIS or any portion thereof.

3 29. Sharon Boswell or Eileen Heideman, SWCA Environmental Consultants. Ms.
4 Boswell or Ms. Heideman may be asked about their expertise, their work, work-product,
5 participation, findings, and SDOT's process to the draft and complete the DEIS and FEIS,
6 including, without limit, working with SDOT, the community, comments, and the contents,
7 analysis and conclusions in the DEIS and FEIS or any portion thereof.
8

9 30. Ben Perkowski, City of Seattle. Mr. Perkowski may be asked about working with
10 SDOT regarding SEPA review for the Missing Link in the Draft EIS and FEIS vis-à-vis the
11 City's Shoreline Master Program, Shoreline Substantial Development Permit process and
12 requirements, the analysis and statements regarding water-dependent and water-related uses and
13 compliance with the City's shoreline zoning and land use requirements in the DEIS and FEIS.
14

15 31. Roque DeHerrera, City of Seattle. Mr. DeHerrera may be asked about his role
16 and participation in completing the Missing Link, the DEIS and FEIS, the City's DAC process,
17 and the business, land use and economic impacts to Ballard-area businesses from the Missing
18 Link.

19 32. Brian Surratt, City of Seattle. Mr. Surratt may be asked about his role and
20 participation in completing the Missing Link, the DEIS and FEIS, the City's DAC process, and
21 the business, land use and economic impacts to Ballard-area businesses from the Missing Link.
22

23 33. Blake Trask, Cascade Bicycle Club ("Cascade"). Mr. Trask may be asked about
24 Cascade's relationship with SDOT in regards to completing the Burke-Gilman Trail Missing
25

1 Link, developing and selecting alternatives, selecting SDOT's Preferred Alternative, and
2 preparing and completing the DEIS and FEIS.

3 34. Kelsey Mesher, Cascade Bicycle Club. Ms. Mesher may be asked about
4 Cascade's relationship with SDOT in regards to completing the Burke-Gilman Trail Missing
5 Link, developing and selecting alternatives, selecting SDOT's Preferred Alternative, and
6 preparing and completing the DEIS and FEIS.
7

8 35. The Coalition reserves the right to name and designate additional witnesses
9 identified during discovery, which is on-going.

10 36. The Coalition reserves the right to name and designation additional witnesses
11 identified on the City's and Cascade's preliminary witness and exhibit lists.

12 III. EXHIBITS³

13 Previously admitted Exhibits in W-08-007.⁴

14 Previously admitted Exhibits in W-11-002.⁵

15 Previously admitted Exhibits in W-12-002.⁶

16 A-81 Dr. Eero Pasanen, The Risks of Cycling

17 A-82 Wayne Pein, A Tale of Three Cities

18 A-84 Jeffrey M. Eustis, Letter (Jan. 21, 2009)

19 A-85 Chris Rule, Cascade Bicycle Club, Letter (Jan. 21, 2009)

20 A-87 Dr. William Moritz, Adult Bicyclists in the U.S.

21 A-88 Dr. William Moritz, A Survey of North American Bicycle Commuters
22

23 ³ Copies to be provided under separate cover on or before 5:00 PM on October 5, 2017 pursuant to the Order dated July 7, 2017.

24 ⁴ Pursuant to the Order, copies of these will not be provided because the City and Cascade are known to possess them.

25 ⁵ See FN 4.

⁶ See FN 4.

- 1 A-126 Photograph, Ballard Mill IMG_7365
- 2 A-127 Photograph, Ballard Mill IMG_7366
- 3 A-128 Photograph, Ballard Mill IMG_7367
- 4 A-129 Photograph, Ballard Mill IMG_7368
- 5 A-130 Photograph, Ballard Mill IMG_7369
- 6 A-131 Photograph, Ballard Mill IMG_7370
- 7 A-175 Photograph, Hatton IMG_7362
- 8 A-176 Photograph, Hatton IMG_7363
- 9 A-177 Photograph, Hatton IMG_7364
- 10 A-178 Photograph, IMG_5387
- 11 A-179 Photograph, IMG_5388
- 12 A-180 Photograph, IMG_5389
- 13 A-181 Photograph, IMG_5390
- 14 A-182 Photograph, IMG_5391
- 15 A-183 Photograph, IMG_5392
- 16 A-184 Photograph, IMG_5393
- 17 A-185 Photograph, IMG_5449
- 18 A-186 Photograph, IMG_5458
- 19 A-187 Photograph, IMG_5459
- 20 A-188 Photograph, IMG_5460
- 21 A-189 Photograph, IMG_5464
- 22 A-190 Photograph, IMG_5465
- 23 A-191 Photograph, IMG_5468
- 24 A-192 Photograph, IMG_5477
- 25 A-193 Photograph, IMG_5480

- 1 A-194 Photograph, IMG_5481
- 2 A-195 Photograph, IMG_5486
- 3 A-196 Photograph, IMG_5490
- 4 A-197 Photograph, IMG_5492
- 5 A-198 Photograph, IMG_5493
- 6 A-199 Photograph, IMG_5494
- 7 A-200 Photograph, IMG_5495
- 8 A-201 Photograph, IMG_5496
- 9 A-202 Photograph, IMG_5497
- 10 A-203 Photograph, IMG_5498
- 11 A-204 Photograph, IMG_5499
- 12 A-205 Photograph, IMG_5499
- 13 A-206 Photograph, IMG_5501
- 14 A-207 Photograph, IMG_5503
- 15 A-208 Photograph, IMG_5506
- 16 A-209 Photograph, IMG_5508
- 17 A-210 Photograph, IMG_5513
- 18 A-211 Photograph, IMG_5514
- 19 A-212 Photograph, IMG_5515
- 20 A-213 Photograph, IMG_5517
- 21 A-224 Photograph, ROW IMG_7360
- 22 A-225 Photograph, ROW IMG_7361
- 23 A-226 Photograph, RRsmall
- 24 A-227 Photograph, Salmon Bay Sand-Gravel IMG_7350
- 25 A-228 Photograph, Salmon Bay Sand-Gravel IMG_7351

- 1 A-229 Photograph, Salmon Bay Sand-Gravel IMG_7352
- 2 A-230 Photograph, Salmon Bay Sand-Gravel IMG_7353
- 3 A-231 Photograph, Salmon Bay Sand-Gravel IMG_7354
- 4 A-232 Photograph, Salmon Bay Sand-Gravel_C Williams IMG_7355
- 5 A-237 Photograph, Stimson Marina IMG_7349
- 6 A-238 Photograph, Vacant IMG_7359
- 7 A-239 Photograph, W1-3.jpg
- 8 A-254.14- Photos
- 9 254.47
- 10 A-254.48 Mixer Truck diagram
- 11 -256 Brookings Institute, May 9, 2012, Interactive: *Locating American Manufacturing*
- 12 A-257 Bookings Institute, May 9, 2012, Seattle Industrial Jobs map and information
- 13 A-258 Brookings Institute, May 2012, *Locating American Manufacturing: Trends in the*
- 14 *Geography of Production*
- 15 ***
- 16 A-300⁷ Arizona Bike Law (2013), *Is It Really 20 Times More Dangerous?*
- 17 A-301 Washington State Maritime Sector Economic Impact Study, 2017 Update
- 18 A-302 Krizek, K. J., Estimating the Economic Benefits of Bicycling and Bicycle
- 19 Facilities
- 20 A-303 Landis, B. W., (2003), Intersection Level of Service for Bicycel Through
- 21 Movement
- 22 A-304 Krizek, K. J. (2004), What is the End of the Road? Factors Affecting
- 23 Discontinuities of On-Street Bicycle Lanes in Urban Settings.

24

25 ⁷ The Coalition will conform its Exhibit numbering in its final witness and exhibit list to continue the Examiner's numbering system from the last hearing.

1 A-305 Jackson, N (2002), Bike Land Design Guide. Chicago, Pedestrian and Bicycle
2 Information Center
3 A-306 Pucher, J. (2001), Cycling Safety on Bikeways v. Roads.
4 A-307 Rasanen, M. (1998), Attention and Expectation Problems in Bicycle-Car
5 Collisions: An In-Depth Study.
6 A-308 Sharples, R. (1995a and b), A framework for the evaluation of facilities for
7 cyclists.
8 A-309 Transpogroup, Memorandum, 5/16/2005, Burke-Gilman Trail Crossing Plan
9 A-310.1-
10 310.xx Exhibits and diagrams and photographs prepared or taken by V. Bishop
11 A-311.1-
12 311.xx Exhibits, diagrams and photographs prepared or taken by C. Hirschey
13 A-312.1-
14 312.xx Exhibits and diagrams prepared by B. Knight
15 A-313.1-
16 313.xx Exhibits and diagrams prepared by S. Kuznicki
17 A-314 V. Bishop's resume
18 A-315 C. Hirschey's resume
19 A-316 B. Knight's resume
20 A-317 S. Kuznicki's resume
21 A-318 Timeline for Missing Link Project from SDOT website (8.31.2017)
22 A-319 Aerial Image of NW Market Street & 26th Avenue (2017)
23 A-320 WSDOT Design Manual Chapter 15—Pedestrian and Bicycle Facilities (2017)
24 A-321 AASHTO Guide for the Development of Bicycle Facilities (4th Ed., 2012)
25 A-322 NACTO Urban Bikeway Design Guide (current version)

- 1 A-323 SDOT Right-of-Way Improvement Manual (2011)
- 2 A-324 SDOT Right-of-Way Improvement Manual (current version pending adoption by
- 3 the City)
- 4 A-325.1-
- 5 325.xx Photographs and/or video taken or prepared at the direction of S. Anderson
- 6 A-326.1-
- 7 326.xx Photographs and/or video taken or prepared at the direction of N. Barron
- 8 A-327.1-
- 9 327.xx Photographs and/or video taken or prepared at the direction of M. Walker
- 10 A-328.1-
- 11 328.xx Photographs and/or video taken or prepared at the direction of Mr. or Mrs. Hatton
- 12 A-329.1-
- 13 329.xx Photographs and/or video taken or prepared at the direction of M. Garrity
- 14 A-330.1-
- 15 330.xx Photographs and/or video taken or prepared at the direction of T. Olstad
- 16 A-331.1-
- 17 331.xx Photographs and/or video taken or prepared at the direction of B. Herzberg
- 18 A-332 FEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (May 2017)⁸
- 19 A-333 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2 (May 2017)
- 20 A-334 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3 (May 2017)
- 21 A-335 FEIS, Burke-Gilman Trail Missing Link Project, Executive Summary (May 2017)
- 22 A-336 DEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (June 2016)⁹
- 23 A-337 DEIS, Burke-Gilman Trail Missing Link Project, Volume 2 (June 2016)
- 24

25 ⁸ Including all documents, data and studies referenced in or relied upon in the FEIS.

⁹ Including all documents, data and studies referenced in or relied upon in the DEIS.

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A-338 Transcript from the previous hearing W-08-007

A-339 Transcript from the previous hearing W-11-002

A-340 Transcript from the previous hearing W-12-002

A-341.1-

341.xxxxx Documents produced by the City, in response to the Coalition’s First Set of Interrogatories and Requests for Production served on the City on June 30, 2017, and received by the Coalition on the following dates:¹⁰

- July 31, 2017;
- August 4, 2017;
- August 10, 2017;
- August 11, 2017;
- August 16, 2017;
- August 17, 2017;
- August 23, 2017;
- August 31, 2017;
- and any future production by the City.

A-342.1-

342.xxxx Documents produced by Cascade, in response to the Coalition’s First Set of Interrogatories and Requests for Production served on Cascade on July 11, 2017, and received by the Coalition on the following dates:¹¹

- August 10, 2017;
- August 21, 2017;

¹⁰ The City and Cascade, via their Common Interest Agreement, are aware of and know the details of all documents listed herein.

¹¹ See FN 10.

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- and any future production by Cascade.

A-343.1-

343.xxxx Public records produced in installments by the Seattle Department of Transportation in response to the following public records requests:¹²

- C010871-031017, submitted by Veris on March 10, 2017;
- C012770-042617, submitted by Veris on April 26, 2017;
- C014637-061917, submitted by Veris on June 19, 2017;
- C014934-062617, submitted by Veris on June 26, 2017;
- C015169-070317, submitted by Veris on July 3, 2017;
- C015396-071017, submitted by Veris on July 10, 2017;
- C015665-071817, submitted by Veris on July 18, 2017;
- C0115866-072417, submitted by Veris on July 24, 2017;
- C016066-072717, submitted by Veris on July 27, 2017;
- C016144-073117, submitted by Veris on July 31, 2017;
- C016512-080817, submitted by Veris on August 8, 2017;
- C016765-081517, submitted by Veris on August 15, 2017;
- C017015-082117, submitted by Veris on August 21, 2017; and
- C017287-082817, submitted by Veris on August 28, 2017.

A-344.1-

344.xxxx Public records produced in installments by the Office of Economic Development in response to the following public records requests:¹³

- C011006-031517, submitted by Veris on March 10, 2017, and
- C012768-042617, submitted by Veris on April 26, 2017.

¹² See FN 10.

¹³ See FN 10.

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A-345.1-

345.xxxx Public records produced in installments by the Office of the Mayor in response to the following public records requests:¹⁴

- C010966-031417, submitted by Veris on March 10, 2017;
- C012769-042617, submitted by Veris on April 26, 2017; and
- C014520-61417, submitted by Veris per the instructions of a Public Records Request Officer, on June 14, 2017.

A-346.1-

346.xxxx Public records produced in installments by the Office of Councilmember Mike O'Brien in response to the following public records requests:¹⁵

- C010899-031317, submitted by Veris on March 10, 2017, and
- C013286-051017, submitted by Veris on April 26, 2017.

A-347.1-

347.xxxx Public records produced in installments by the Seattle City Budget Office in response to the following public records requests: C012822-042817, submitted by Veris on April 26, 2017.

A-348.1-

348.xxxx Public records produced in installments by the Seattle Department of Construction & Inspections in response to the following public records requests:¹⁶

¹⁴ See FN 10.
¹⁵ See FN 10.
¹⁶ See FN 10.

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- C014636-061917, submitted by Veris on June 19, 2017;
- C014933-062617, submitted by Veris on June 26, 2017;
- C015168-070317, submitted by Veris on July 3, 2017;
- C015395-071017, submitted by Veris on July 10, 2017;
- C015664-071817, submitted by Veris on July 18, 2017;
- C015865-072417, submitted by Veris on July 24, 2017;
- C016143-073117, submitted by Veris on July 31, 2017;
- C016511-080817, submitted by Veris on August 8 2017;
- C016765-081517, submitted by Veris on August 15, 2017;
- C017014-082117, submitted by Veris on August 21, 2017; and
- C017286-082817, submitted by Veris on August 28, 2017.

A-349.1-

349.xxxx Copies of documents produced on or before September 5, 2017 to Cascade, with a courtesy copy provided to the City, in response to Cascade’s first set of discovery to the Coalition.

Additionally, the Coalition reserves the right to later designate relevant documents listed by the City or Cascade on their respective witness or exhibit lists.

DATED this 8th day of September, 2017.

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DECLARATION OF SERVICE

I declare under penalty of perjury under the laws of the State of Washington that on this date I caused the foregoing document to be served on the following persons via the methods indicated:

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Dated at Seattle, Washington, this 8th day of September, 2017.

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