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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) DECLARATION OF DALE
Statement, prepared by the Seattle Department of) JOHNSON IN SUPPORT OF
Transportation for the Burke-Gilman Trail Missing) SEATTLE DEPARTMENT OF
Link Project) TRANSPORTATION'S MOTION TO
) COMPEL
)
_____)

I, Dale Johnson, under oath, declare and state as follows:

1. I am over eighteen years of age, have personal knowledge of the matters herein, and am competent to testify regarding all matters set forth herein.
2. I am one of the attorneys for Respondent Seattle Department of Transportation (SDOT) in this matter.
3. Attached hereto as Exhibit A is a true and correct copy Seattle Department of Transportation's First Set of Interrogatories and Requests for Production dated August 15, 2017 (SDOT's Discovery).
4. Attached hereto as Exhibit B is a true and correct copy of the Ballard Coalition's Responses to Seattle Department of Transportation's First Set of Interrogatories and Requests for Production dated September 14, 2017. The Coalition has provided no documents in response to SDOT's Discovery.

1 5. Attached hereto as Exhibit C is a true and correct copy of the Ballard Coalition's
2 Disclosure of Witnesses and Exhibits dated September 8, 2017.

3 6. On September 19, 2017, counsel for all parties conferred pursuant to CR 26(i) to
4 address the Coalition's failure to adequately respond to SDOT's Discovery. Counsel for the
5 Coalition stated that it is not required to designate its expert witnesses, and by extension need not
6 produce responsive documents related to those witnesses' opinions and testimony, until the Pre-
7 Hearing Order's deadline for exchange of final witness lists and exhibit lists on October 6, 2017.

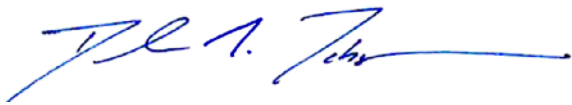
8 7. During the CR26(i) discovery conference, Coalition counsel offered to provide
9 documents in response to SDOT's Request for Production No. 3, which seeks documents reviewed
10 or relied upon by the Coalition's expert witnesses. Because these include documents previously
11 provided to the Coalition by SDOT, SDOT agreed to consider a list of such documents prior to
12 requiring their production. The remaining issues associated with the Coalition's failure to provide
13 information and documents responsive to SDOT's Discovery are unresolved.

14 8. During the CR26(i) discovery conference, Coalition counsel suggested that the
15 Coalition may not make its expert witnesses available for depositions until after the deadline for
16 exchange of witness and exhibit lists on October 6, 2017. Following the conference, Coalition
17 counsel Leah Silverthorn, contacted me and co-counsel and offered to make a tentative decision
18 about whether or not to designate certain witnesses as testifying experts on or before September, 22
19 2017. However, she noted that those witnesses' opinions were not final and would unlikely be final
20 if SDOT chose to depose them before the Coalition's review of documents produced by SDOT.
21 This did not resolve the issue of document production related to SDOT's Discovery, without which
22 SDOT cannot engage in productive depositions of Coalition expert witnesses. SDOT nevertheless
23 intends to continue to cooperate with the Coalition to schedule expert witness depositions at
mutually agreeable times.

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I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 22nd day of September, 2017.



Dale Johnson, Declarant

EXHIBIT A

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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) **THE CITY’S FIRST SET OF**
Link Project) **INTERROGATORIES AND**
) **REQUESTS FOR PRODUCTION**
) **TO PETITIONER THE BALLARD**
) **COALITION**
)

TO: The Ballard Coalition
AND TO: Josh Brower, Danielle Granatt and Leah Silverthorn of Veris Law Group,
and Patrick Schneider of Foster Pepper LLC, attorneys for Plaintiffs

INTERROGATORIES AND REQUESTS FOR PRODUCTION

Pursuant to HER 3.11, CR and KCLR 26, 33, and 34, Respondent the City of Seattle, Department of Transportation (the “City”) hereby requests that you produce for inspection and copying the described documents within your possession, custody, or control, and that you respond to the following interrogatories. Please respond to the interrogatories and produce the documents at the offices of the Seattle City Attorney’s Office, 701 Fifth Avenue, Suite 2050, Seattle, WA 98104, within thirty (30) days after the date of service.

1 **GENERAL INSTRUCTIONS**

2 1. The answer to each Discovery Request shall include such knowledge as is within
3 your custody, possession, or control, including but not limited to, knowledge and documents in
4 your custody, possession, or control, or that of associated or related organizations, or those under
5 common control of your consultants, accountants, attorneys, and other agents. When facts set
6 forth in answers or portions thereof are supplied upon information and belief rather than actual
7 knowledge, you shall so state, and specifically describe or identify the source or sources of such
8 information and belief. Should you be unable to answer any Discovery Request or portion
9 thereof by either actual knowledge or upon information and belief, you should describe your
10 efforts to obtain such information.

11 2. In the event you produce original documents for inspection and copying, such
12 production shall be as the documents are kept in the usual course of business.

13 3. Documents copied shall be copied as they are kept in the normal course of
14 business, and any titles, labels, or other descriptions on any box, folder, binder, file cabinet, or
15 other container shall be copied as well. Documents originating in paper format should be
16 scanned as images at the time of copying, with optical character recognition (“OCR”). Scanned
17 images shall be produced in the same format as electronically stored information, as set forth
18 below.

19 4. The obligations imposed by Rules 26, 33 and 34 of the Washington Court Civil
20 Rules are hereby incorporated by reference, including, but not limited to, the duty to supplement
21 imposed by Rule 26(e). Supplemental answers and documents are requested in the event that
22 you subsequently obtain or become aware of the existence of information that differs from or is
23 in addition to that contained in earlier answers.

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2 5. Non-identical copies of the same document (i.e., with marginal notes, etc.)
3 constitute separate documents and must all be produced.

4 6. Electronically stored information shall be produced in reasonably usable form,
5 including specifically any ability to search or perform calculations with the information in the
6 form it is maintained by Plaintiff(s).

7 7. Email, word processing documents and spreadsheets (e.g. Excel documents) shall
8 be converted to images and produced, together with requested metadata, except that the City
9 explicitly reserves the right to request supplemental production of spreadsheets in native file
10 format.

11 8. Electronically stored information in other formats shall be identified prior to
12 production to permit the parties to confer over production format.

13 9. If you claim that any privilege is applicable to any requested document or other
14 thing, or any part thereof, you shall, with respect to that document or other thing:

- 15 (i) State the date of origination, drafting, making or taking of the document;
16 (ii) Identify each and every author, maker, or originator thereof;
17 (iii) Identify each and every person who appeared or participated in the preparation
18 thereof;
19 (iv) Identify each and every person who received the document or other thing;
20 (v) State the present location of the document or thing and all copies thereof;
21 (vi) Identify each and every person who has or ever had possession, custody or control
22 of the document or other thing or any copy thereof; and
23 (vii) Identify the basis of the asserted claim of privilege.

1 This information shall be provided in a privilege log that shall be provided at the time of
2 the discover response.

3 10. In responding to the following Requests, you shall furnish all information that is
4 available to you, including information in the possession, custody, or control of your attorneys,
5 accountants, investigators, experts, representatives, agents, or anyone acting on your behalf or on
6 their behalf. If you cannot answer these requests in full, answer to the extent possible, specify
7 the reasons for your inability to answer the remainder, and state whatever information or
8 knowledge you have concerning the unanswered portion, and identify each person whom you
9 believe has information regarding the subject of Request.

10 11. If any Discovery request seeks documents formerly in your possession, custody,
11 or control that have been discarded, misplaced, lost, destroyed, or otherwise placed outside your
12 custody or control, identify the document and describe its contents in detail and state when the
13 document was discarded, misplaced, lost, destroyed, or otherwise placed outside your custody or
14 control. If the document was destroyed, identify each person with knowledge of its destruction,
15 each person requesting or performing the destruction, the reasons for its destruction, and each
16 document that refers or relates to either the existence of or destruction of the document. For each
17 document that was discarded, misplaced, lost, or otherwise placed outside your custody or
18 control, explain all circumstances in relation to the loss of the document and identify each person
19 with knowledge regarding those circumstances.

20 12. The singular shall include the plural and vice versa and the conjunctive shall
21 include the disjunctive and vice versa. References to the masculine, feminine, or neuter gender
22 shall include the neuter, feminine and masculine genders, as the context requires.

1 **DEFINITIONS**

2 1. “**Action**” means the litigation and claims that are the subject of this case, Case
3 No. W-17-004.

4 2. “**Company**” means a corporation, partnership, limited liability company, or other
5 business entity.

6 3. “**Respondent**” or “**the City**” means City of Seattle, Department of
7 Transportation, as well as any of its past and present agents, attorneys, officers, employees, or
8 other representatives.

9 4. “**Person**” means any individual, corporation, partnership, association, or any
10 other form of business, social, or legal entity.

11 5. “**Document**” The term "document" means all written, graphic, or otherwise
12 recorded information, whether produced, reproduced, or stored on paper, cards, tapes file,
13 electronic facsimile, computer storage devices, memories, data cells, or other data compilations
14 from which information can be obtained, including but not limited to letters, reports, notes,
15 memoranda, receipts, email, logs, electronic data files, photographs and negatives thereof, charts,
16 surveys, building plans or drawings, engineering plans or drawings, architectural plans or
17 drawings, telegrams, minutes, recording of telephone conversations, interviews, conferences or
18 other meetings, estimates, schedules, contracts, desk calendars, appointment books, diaries,
19 audio or video tapes, and all things similar to the foregoing, however denominated, and any and
20 all matter of material applied to any of the above. "Document" also includes any additional
21 copies which are not identical to the original by virtue of any notation or modification of any
22 kind, including, without limiting the generality of the foregoing, notes or modifications on the
23

1 backs or margins of pages thereof, or on copies thereof, or by virtue of attachments thereto. The
2 term document shall include any amendments to the requested document.

3 6. The term “**communication**” means any conversation, meeting, correspondence,
4 conference, electronic mail, and any other means or manner by which information or opinion is
5 or was communicated to or received from others, whether written or oral.

6 7. To “**identify**” a person means to state the full name of the individual, the
7 individual’s last known business and home addresses and phone numbers, and, if known, the
8 individual’s present or last known business affiliation and title.

9 8. The term “**identify**” or “**identification**” when used in reference to a document
10 means to state the date and author(s), signer(s), intended recipient(s), and its present or last
11 known location or custodian. If any such document was, but is no longer, in your possession or
12 subject to your control, state what disposition was made of it, and the reason for such disposition.

13 9. “**Expert witness**” means any person whose testimony may be presented, for any
14 purpose, under Evidence Rules 702, 703 or 705.

15 13. The term “**you**” shall mean the Ballard Coalition, its executives, and its
16 representatives, including but not limited to, its members.

17 14. The terms “**and**” and “**or**” shall be understood in both the conjunctive and
18 disjunctive sense, synonymous with “**and/or**.”

19 15. The terms “**any**” and “**all**” shall be understood in their most inclusive sense,
20 synonymous with “**any or all**.”

21 **OBJECTIONS**

22 If you object to answering any interrogatory or request for production, in whole or in
23 part, state your objection and the factual or legal reasons supporting it. If you object on grounds

1 of privilege, please also state the nature and extent of all allegedly privileged matters in sufficient
2 detail to allow the City to seek an order compelling disclosure of the information in question.
3 State the date, author(s), addresses, persons receiving copies of, and the general subject matter of
4 each document withheld under a claim of privilege and/or work product. For each request for
5 production or part thereof to which you object on the ground of burdensomeness, please indicate
6 the custodian and location of each file or document requested, the time estimated to obtain the
7 information, and the costs necessary to answer, as well as the basis for the cost estimate.

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9 **INTERROGATORIES**

10 **INTERROGATORY NO. 1:** Identify each person you intend to call as an expert witness
11 and/or provide expert testimony in this proceeding. For each such witness state:

- 12 (a) The name, address and phone number of the witness; and
13 (b) The subject matter about which the witness is expected to provide testimony.
14 (c) The substance of the facts and opinions to which the expert will provide
testimony; and,
15 (d) A summary of the grounds for each such opinion.

16 **RESPONSE:**

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20 **INTERROGATORY NO. 2:** For each expert witness identified in your response to
21 Interrogatory No. 1, describe in full detail all analyses, studies, reports, models, or research that
22 the Expert witness conducted or reviewed to form his or her opinions or prepare his or her
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1 testimony, including all data used and parameters applied in any analyses, studies, reports,
2 models or research.

3 **RESPONSE:**
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7 **INTERROGATORY NO. 3:** For each expert witness identified in your response to
8 Interrogatory No. 1, identify every proceeding (administrative, court, or otherwise) in which the
9 expert has testified or offered an expert report in the last ten (10) years, including the forum and
10 date of that testimony or report.

11 **RESPONSE:**
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22 **REQUESTS FOR PRODUCTION**
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1 **REQUEST FOR PRODUCTION NO. 1:** Produce all reports (including preliminary reports
2 and drafts) notes, memoranda, communications, and any other documents prepared by or for
3 each expert you identified in response to Interrogatory No. 1.

4 **RESPONSE:**
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8 **REQUEST FOR PRODUCTION NO. 2:** Produce curriculum vitae for each expert witness
9 identified in your response to Interrogatory No. 1.
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11 **RESPONSE:**
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15 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents provided to, reviewed, and/or
16 relied upon by each expert identified in response to Interrogatory No. 1.
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18 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 4:** Produce Communications between each expert you
2 identified in response to Interrogatory No. 1, and any other person, including, but not limited to,
3 Appellants, Appellant's attorneys (including attorney staff members), the Expert's employees, or
4 the Expert's employers that in any way relate to the Expert's opinions and/or testimony in this
5 case.

6 **RESPONSE:**

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13 DATED this 15th day of August, 2017.

14 PETER S. HOLMES
15 Seattle City Attorney

16 By: s/Erin E. Ferguson, WSBA #39535
17 Assistant City Attorney
erin.ferguson@seattle.gov
18 Seattle City Attorney's Office
701 Fifth Ave., Suite 2050
19 Seattle, WA 98104-4769
Ph: (206) 684-8615
20 Fax: (206) 684-8284
Attorneys for Respondent
Department of Transportation

21 VAN NESS FELDMAN LLP

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**Per Email Authorization*

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Tadas A. Kisielius, WSBA #28734
Dale Johnson, WSBA #26629
Clara Park, WSBA #52255
719 Second Avenue, Suite 1150
Seattle, WA 98104
Tel: (206) 623-9372
E-mail: tak@vnf.com; dnj@vnf.com;
cpark@vnf.com

EXHIBIT B

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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

THE BALLARD COALITION

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

Hearing Examiner File

W-17-004

THE BALLARD COALITION'S
RESPONSES TO SEATTLE
DEPARTMENT OF TRANSPORTATION'S
FIRST SET OF INTERROGATORIES AND
REQUESTS FOR PRODUCTION

TO: Seattle Department of Transportation

C/O: Erin Ferguson
Seattle City Attorney's Office
701 5th Avenue, Suite 2050
Seattle, WA 98104

Tadas A. Kisielius
Dale Johnson
Clara Park
Van Ness Feldman LLP
719 2nd Avenue, Suite 1150
Seattle, WA 98104

Pursuant to HER 3.11, CR 26 and 33, and CR 34, the Ballard Coalition (the
"Coalition") submits its objections, responses and answers ("Responses") to the Seattle

1 Department of Transportation's ("SDOT") First Set of Interrogatories and Requests for
2 Production to the Ballard Coalition, dated August 15, 2017 (the "Requests").

3 No admission of any nature whatsoever are implied or should be inferred from these
4 Responses. Each of these Responses is based on the Ballard Coalition's understanding of each
5 individual request made by SDOT. To the extent that SDOT asserts an interpretation of any
6 request that is inconsistent with the Coalition's understanding, it reserves the right to supplement
7 these Responses.

8 **I. GENERAL RESPONSES & OBJECTIONS**

9 The assertion of the same, similar, or additional objections in response to specific
10 interrogatories or document requests below (collectively, a "Request") does not waive or modify
11 any of these General Responses and Objections. Documents that fall within any of the categories
12 of the General Responses and Objections will not be produced. Any inadvertent disclosure of
13 such documents shall not be deemed a waiver of any objection.

14 1. The Coalition objects to each Request to the extent that it seeks information or
15 documents protected by the attorney-client privileged, the attorney work product doctrine,
16 including without limitation an attorney's mental impressions, conclusions, opinions, and/or
17 legal theories, or any other applicable privileges or protections. In the event that any privileged
18 information is disclosed by the Coalition, such disclosure is inadvertent and should not be
19 deemed to have waived any such privilege or protection and should be returned to the Coalition's
20 attorney.

21 2. The Coalition objects to each Request to the extent it seeks information that is not
22 available to it or documents which are not within its possession, custody, or control.

23 3. The Coalition objects to the Requests to the extent they seek to impose
24 obligations on it that are greater than those imposed by the Washington Rules of Civil Procedure,
25 the Superior Court Civil Rules, or the Hearing Examiner's Rules, collectively, the "Civil Rules."

1 4. The Coalition objects to each Request to the extent it is overly broad, unduly
2 burdensome, vague, ambiguous, or does not specify the information sought with reasonable
3 particularity.

4 5. The Coalition objects to each Request to the extent it seeks information or
5 documents that are not relevant to any party's claims in this matter.

6 6. The Coalition objects to each Request to the extent it seeks information that is
7 already within the possession, custody, or control of Respondents, or is otherwise equally
8 accessible to Respondents, especially in light of the Respondents' Common Interest Agreement
9 with the Cascade Bicycle Club ("Cascade").

10 7. The Coalition objects to the Requests to the extent they seek electronically stored
11 information from sources that are not reasonably accessible because of undue burden or cost.

12 8. The Coalition objects to the Requests to the extent they seek production of
13 documents that are publically available. The burden of obtaining such documents is the same for
14 Respondent as it is for the Coalition.

15 9. The Coalition objects to the Requests to the extent the discovery they seek is
16 unreasonably cumulative or duplicative, or can be obtained from some other source which is
17 more convenient, less burdensome, or less expensive.

18 10. The Coalition objects to the Requests to the extent the discovery is unduly
19 burdensome or expensive, taking into account the needs of the case, limitations on the parties'
20 resources, and the importance of the issues at stake in this matter.

21 11. The Coalition objects to the Requests to the extent they (including instructions
22 and definitions) call for a legal conclusion.

23 12. The Coalition objects to all instructions and definitions to the extent they enlarge
24 upon, supersede, or in any way modify the rules of discovery set forth in CR 26, CR 33 or CR 34
25 of the Civil Rules or the Hearing Examiner's Rules.

1 13. The Coalition's Responses to the Requests are not and shall not be deemed to be a
2 waiver of or limitation on its right to object to the admissibility of any evidence on any ground,
3 including but not limited to authenticity, confidentiality, relevance, materiality or privilege, or the
4 right to object, on any ground, to the use of these Responses or the subject matter thereof in any
5 proceeding or in the hearing in this action.

6 14. The Coalition objects to the Requests to the extent they call for expert opinion or,
7 to the extent they seek to impose expert disclosure obligations beyond those imposed by the
8 Civil Rules or the Hearing Examiner's Rules.

9 15. The Coalition expressly reserves the right to supplement or revise these
10 Responses, and revise its objections to any of the Requests, in compliance with CR 26(e) of the
11 Civil Rules.

12 **II. SPECIFIC RESPONSES AND OBJECTIONS**

13 **A. INTERROGATORIES**

14 **INTERROGATORY NO. 1:** Identify each person you intend to call as an expert witness
15 and/or provide expert testimony in this proceeding. For each such witness state:

- 16 (a) The name, address and phone number of the witness; and
17 (b) The subject matter about which the witness is expected to provide testimony.
18 (c) The substance of the facts and opinions to which the expert will provide
19 testimony; and,
20 (d) A summary of the grounds for each such opinion.

21 **RESPONSE:**

22 The Coalition incorporates by reference the above General Objections and further objects
23 to this Interrogatory to the extent its seeks to enlarge the Coalition's obligations under the Civil
24 Rules, the Hearing Examiner's Rules, or the Prehearing Order entered in this matter. Without
25 waiving the foregoing objections and in an attempt to answer, the Coalition responds as follows:
Discovery and hearing preparation is ongoing. Please see the Coalition's preliminary disclosure
of witnesses and exhibits served and filed on September 8, 2017.

1 **INTERROGATORY NO. 2:** For each expert witness identified in your response to
2 Interrogatory No. 1, describe in full detail all analyses, studies, reports, models, or research that
3 the Expert witness conducted or reviewed to form his or her opinions or prepare his or her
4 testimony, including all data used and parameters applied in any analyses, studies, reports,
5 models or research.

6 **RESPONSE:**

7 The Coalition incorporates by reference the above General Objections and further objects
8 to this Interrogatory to the extent that it seeks disclosure of information that is protected by the
9 attorney-client privilege or work-product immunity or seeks confidential information. Without
10 waiving the foregoing objections and in attempt to answer, the Coalition responds as follows:
11 See response to Interrogatory No. 1 above.

12 **INTERROGATORY NO. 3:** For each expert witness identified in your response to
13 Interrogatory No. 1, identify every proceeding (administrative, court, or otherwise) in which the
14 expert has testified or offered an expert report in the last ten (10) years, including the forum and
15 date of that testimony or report.

16 **RESPONSE:**

17 The Coalition incorporates by reference the above General Objections and further objects
18 to this Interrogatory to the extent that it seeks disclosure of information that is protected by the
19 attorney-client privilege or work-product immunity or seeks confidential information. Without
20 waiving the foregoing objections and in attempt to answer, the Coalition responds as follows:
21 See response to Interrogatory No. 1 above.

22 **B. REQUESTS FOR PRODUCTION**

23 **REQUEST FOR PRODUCTION NO. 1:** Produce all reports (including preliminary reports
24 and drafts) notes, memoranda, communications, and any other documents prepared by or for
25 each expert you identified in response to Interrogatory No. 1.

1 **RESPONSE:**

2 The Coalition incorporates by reference the above General Objections and further objects
3 to this Request for Production to the extent its seeks information subject to attorney-client or
4 work product privileges, or seeks to enlarge the Coalition’s obligations under the Civil Rules, the
5 Hearing Examiner’s Rules or the Prehearing Order entered in this matter. Without waiving the
6 foregoing objections and in an attempt to answer, the Coalition responds as follows: See
7 response to Interrogatory No. 1 above.

8 **REQUEST FOR PRODUCTION NO. 2:** Produce curriculum vitae for each expert witness
9 identified in your response to Interrogatory No. 1.

10 **RESPONSE:**

11 The Coalition incorporates by reference the above General Objections and further objects
12 to this Request for Production to the extent its seeks information subject to attorney-client or
13 work product privileges, or seeks to enlarge the Coalition’s obligations under the Civil Rules, the
14 Hearing Examiner’s Rules or the Prehearing Order entered in this matter. Without waiving the
15 foregoing objections and in an attempt to answer, the Coalition responds as follows: See
16 response to Interrogatory No. 1 above.

17 **REQUEST FOR PRODUCTION NO. 3:** Produce all documents provided to, reviewed, and/or
18 relied upon by each expert identified in response to Interrogatory No. 1.

19 **RESPONSE:**

20 The Coalition incorporates by reference the above General Objections and further objects
21 to this Request for Production to the extent its seeks information subject to attorney-client or
22 work product privileges, or seeks to enlarge the Coalition’s obligations under the Civil Rules, the
23 Hearing Examiner’s Rules or the Prehearing Order entered in this matter. Without waiving the
24 foregoing objections and in an attempt to answer, the Coalition responds as follows: See
25 response to Interrogatory No. 1 above. The Coalition will produce documents that may be

1 responsive to this Request on or before October 8, 2017.

2 **REQUEST FOR PRODUCTION NO. 4:** Produce Communications between each expert you
3 identified in response to Interrogatory No. 1, and any other person, including, but not limited to,
4 Appellants, Appellant's attorneys (including attorney staff members), the Expert's employees, or
5 the Expert's employers that in any way relate to the Expert's opinions and/or testimony in this
6 case.

7 **RESPONSE:**

8 The Coalition incorporates by reference the above General Objections and further
9 objects to this Request for Production to the extent its seeks information subject to attorney-
10 client or work product privileges, or seeks to enlarge the Coalition's obligations under the Civil
11 Rules, the Hearing Examiner's Rules or the Prehearing Order entered in this matter. Without
12 waiving the foregoing objections and in an attempt to answer, the Coalition responds as follows:
13 See response to Interrogatory No. 1 above. The Coalition will produce documents that may be
14 responsive to this Request on or before October 6, 2017.
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VERIFICATION

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

Paul Nerdrum, being first duly sworn upon oath, deposes and says: I am the Vice President of Salmon Bay Sand & Gravel Co., which is a member of the Ballard Coalition and am authorized to sign this document on their behalf. I have read the above and foregoing APPELLANT’ RESPONSES AND OBJECTIONS TO SDOT’S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION, know the contents thereof and believe the same to be true.

Signature

Print Name

SIGNED AND SWORN to before me this ____ day of September, 2017.

Notary Public in and for the State of

Residing at _____

My Commission expires _____

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ATTORNEY CERTIFICATION

The undersigned attorneys for Appellant the Ballard Coalition have read the foregoing BALLARD COALITION'S RESPONSES TO SDOT'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION, know and hereby certify that they are in compliance with Fed. R. Civ. P. 33 (b).

DATED this 14th day of September, 2017.

VERIS LAW GROUP PLLC

By /s/ Joshua C. Brower
Joshua C. Allen Brower, WSBA #25092
Leah B. Silverthorn, WSBA #51730
Danielle Granatt, WSBA #44182
Veris Law Group PLLC
1809 Seventh Avenue, Suite 1400
Seattle, WA 98101
Telephone: (206) 829-9590
Facsimile: (206) 829-9245
josh@verislawgroup.com
leah@verislawgroup.com
danielle@verislawsgroup.com

Attorneys for Appellant The Ballard Coalition

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Attorneys for Appellant The Ballard Coalition

1 **DECLARATION OF SERVICE**

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

5 Peter S. Holmes
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14 *Seattle Department of Transportation*

- Overnight Delivery via Fed Ex
- First Class Mail via USPS
- Hand-Delivered via ABC Legal Messenger
- Facsimile
- E-mail / HE ECF

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- Overnight Delivery via Fed Ex
- First Class Mail via USPS
- Hand-Delivered via ABC Legal Messenger
- Facsimile
- E-mail / HE ECF

18 Dated at Seattle, Washington, this 14th day of September, 2017.

19
20 /s/ Megan Manion
21 Megan Manion, Veris Law Group PLLC

22 4848-2230-9197, v. 2

EXHIBIT C

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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

THE BALLARD COALITION

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

Hearing Examiner File

W-17-004

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 3. Barry S. Knight, P.E. Mr. Knight may testify regarding his work and opinion
17 related to the design and constructability of an elevated structure to be used as a multi-use path
18 for the Missing Link within a portion of the "study area" as that term is defined in the FEIS, and
19 the approximate cost to do so.¹ A copy of Mr. Knight's resume is attached.
20
21
22
23
24

25 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

23
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 Bicycle 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.

VERIS LAW GROUP PLLC

By /s/ Joshua C. Brower
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leah@verislawgroup.com
danielle@verislawsgroup.com

Attorneys for Appellant The Ballard Coalition
FOSTER PEPPER PLLC

By /s/ Patrick J. Schneider
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Attorneys for Appellant The Ballard Coalition

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:

Peter S. Holmes
Erin Ferguson
Seattle City Attorneys
701 5th Avenue, Suite 2050
Seattle, WA 98104
Tel: (206) 684-8615
erin.ferguson@seattle.gov
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*Attorney for Respondent
Seattle Department of Transportation*

- Overnight Delivery via Fed Ex
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Dated at Seattle, Washington, this 8th day of September, 2017.

/s/ Megan Manion
Megan Manion, Veris Law Group PLLC

APPENDIX A

BARRY S. KNIGHT, PE, CENG, MICE

7001 Meadowdale Beach Road
Edmonds, WA 98026
USA

Phone (home): (425) 743-9292
Phone (mobile): (425) 766-6876
Email : barrysknight@gmail.com



EDUCATION	University of Aston, Birmingham, England BS – Civil Engineering, 1964
REGISTRATIONS	Professional Engineer – Washington, California, Alaska and Pennsylvania CEng., MICE – United Kingdom
MEMBERSHIPS	Member, American Society of Civil Engineers Member, American Public Works Association Member, Institution of Civil Engineers, U.K.
PROJECT MANAGEMENT EXPERIENCE	Project Manager involved in the planning, design and construction management of highways and bridges for 40 years
BUSINESS DEVELOPMENT EXPERIENCE	Responsible for business-development activities at a principal or senior level for over 36 years, including initiating client contacts, writing technical proposals, interviewing, and negotiating contracts.
LANGUAGES	English & Spanish – Fluent French & German – Basic understanding
PROFESSIONAL HISTORY	
May, 2007 - Present	President & CEO of CTS Engineers, Bellevue, WA
June, 2002 – May, 2007	Executive Vice President & COO of CTS Engineers, Bellevue, WA
2000 – May 2002	Principal/Vice President of TranSystems Corporation, Seattle, WA
1996 – 2000	Principal/Vice President of Kato & Warren, Inc., Seattle, WA
1988 – 1996	Principal/Senior Vice President of TAMS Consultants, Inc., Seattle, WA
1981 – 1988	Business Developer/Project Manager for TAMS Consultants, Inc., based consecutively in New York, NY; Lima, Peru; and Seattle, WA
1978 – 1981	Project Manager for Michael Baker, Jr., Inc. based in Beaver, PA
1974 – 1978	Construction Supervision Manager for Michael Baker, Jr. for 126 km of new paved highway in the Andes mountains of Peru, South America
1972 – 1974	Chief Highway Engineer for Howard Humphreys, Keeble & Partners responsible for final design, plans and specifications for 180 km of new paved highway in Honduras, Central America
1969 – 1972	Project Manager for Trevor Crocker & Partners, Croydon, U.K.
1966 – 1969	Bridge & Roadway Design Engineer for Surrey County Council, U.K.
1963 – 1966	Assistant Engineer for Coventry County Borough, U.K.

EXPERIENCE IN USA

Sound Transit, Seattle, WA (2002 to 2009):

Link Light Rail Project - Seattle to Sea-Tac International Airport: CTS Project Manager for the civil/roadway design interface for a 6.7-mile-long section of Seattle's Link Light Rail Project, including South 154th Street Station Park and Ride in Tukwila, and Airport Station at Sea-Tac International Airport.

Federal Highway Administration IDIQ Contract, Vancouver, WA:

Principal and Project Manager for a \$2.5 million (fee), 5-year, IDIQ Contract with the Western Federal Lands Highway Division. Task Orders included:

- Final Design for Thorne Bay Road, Prince of Wales Island, Alaska
- Final Design for Benchland Road, Sitka, Alaska
- Final Design for environmental mitigation, Ward Lake Road, Ketchikan, Alaska
- Final Design for Curly Creek Road Paving Project, Skamania County, WA
- Final Design for West Snider Road, Clallam County, WA
- Final Design for 2 Rest Areas on Mather Memorial Parkway, WA
- Preparation of 3 Project Identification Reports in WA

Coffman Cove Road Design-Build Project, Phase II, Prince of Wales Island, Alaska:

Project Manager for preparing preliminary design for realigning and reconstructing 3 miles of the Coffman Cove Road at Coffman Cove. Client: South Coast, Inc. (Contractor) for USDA Forest Service, Tongass National Forest.

Washington State Department of Transportation (WSDOT):

Principal or Project Manager for the following projects:

- I-5, SR 18, SR 161 Triangle Interchange Design Study, Federal Way
- SR 20, Fredonia to I-5, Traffic Study Update, Skagit County
- PS&E for SR 547 & SR 9 Paver Projects, Whatcom County
- SR 518, Route Development Plan and EA, SeaTac
- SR 518, Corridor Study (Assistant Project Manager)
- SR 16, Tacoma Narrows Bridge Corridor Study and EIS
- SR 24, Yakima to Moxee, Corridor Analysis Report
- I-90, Luther Burbank Lid, Mercer Island, Final Design
- Bridge Load Rating of over 500 Bridges Statewide
- On-Call Bridge Design Services

City & Borough of Juneau, Alaska:

CTS Project Manager for road and utility improvement projects in Southeast Alaska.

- Traffic Studies & Design for Main Street Improvements, Juneau
- Traffic Studies & Design for Seward Street Reconstruction, Juneau
- Design for Water/Sewer Utilities Replacement Project, Douglas

**EXPERIENCE IN USA
(Continued)**

County Projects in WA:

Project Manager or Principal-in-Charge for design of the following projects:

- Hillcrest Drive Bridge #160 Replacement, Yakima, Yakima County
- Grant Road Improvement Project, East Wenatchee, Douglas County
- 228th Avenue NE/SE Widening, Sammamish, King County
- South 96th Street Widening & Improvement, Seattle, King County
- SE 192nd Street & 116th Avenue SE Widening, King County
- Mullen Road Realignment & Improvement, Thurston County
- Silverdale Access & Circulation Study, Kitsap County
- Hansville-Area Connector Corridor Study, Kitsap County
- Chico Creek Bridge Replacement, Kitsap County
- Cross-Base Corridor Study, Ft. Lewis & McChord AFB, Pierce County
- 176th Street Easterly Extension, Pierce County

City Projects in WA:

Project Manager or Principal-in-Charge for design of the following projects:

- Harborview Drive & Judson Street Improvements, Gig Harbor
- SR 161, Town-Center & Corridor Development, Eatonville
- Coal Creek Parkway Widening, Phase 1, Newcastle
- Slater Avenue NE Widening & Improvement, Kirkland
- Oakesdale Avenue SW Extension, Phases 1 and 2, Renton
- Britton Parkway (new principal arterial), Lacey
- South Sequim Avenue Design Review, Sequim

Other Projects in WA:

Project Manager or Principal-in-Charge for design of the following projects:

- South 154th Street/156th Way/Miller Creek Relocation at Sea-Tac International Airport for Port of Seattle
- Omega Industrial Site Development in Auburn for Omega Industrial Contractors, Inc.

Oregon Department of Transportation (ODOT):

Project Manager for the following projects:

- Preliminary Design & Environmental Documentation for Sunrise Corridor, Clackamas County
- I-84, Multnomah Falls Interchange Study, Multnomah County
- Preliminary Design for I-84 Widening, 181st Avenue to Troutdale, Multnomah County
- On-Call Bridge Load-Rating Services for 100 Bridges

Idaho Transportation Department (ITD):

- SH-33, Conceptual Design for improving 2 miles of State Highway (Main Street) through downtown Driggs, ID

BARRY S. KNIGHT, PE, CENG, MICE

EXPERIENCE IN USA (Continued)

CALTRANS in California:

Project Manager for the following design projects:

- Route 139 Relocation Study, Eagle Lake, Lassen County
- Route 41 Widening, Madera County
- Highway 50 Study, Placerville
- Route 1 Widening, Castroville to Santa Cruz County Line
- Route 180, Brawley Avenue to Route 99, Fresno

Other Projects in California:

Project Manager for the following design projects:

- Andersen Drive Extension, City of San Rafael
- Bellam Boulevard/I-580 Interchange Alternatives Study, City of San Rafael
- Kerner Boulevard Extension, City of San Rafael

Arizona Department of Transportation (ADOT):

Project Engineer for the following design projects:

- Outer Loop Freeway, First Street to Southern Avenue, Tempe
- Southeast Loop and Price Expressway, Tempe/Chandler

OVERSEAS EXPERIENCE

Los Bronces Mine-Access-Road Study, Chile, South America:

Project Manager for feasibility study and preliminary design for a 45-kilometer access road in the Chilean Andes mountains, related to the expansion of the Los Bronces copper mine. Developed and evaluated 3 alternative alignments through extremely mountainous terrain, involving long tunnels and other major structures. **Client:** Exxon Corporation.

Lima – Chosica - Ricardo Palma Autopista, Peru, South America:

Project Manager based in Lima for the preliminary and final design of a 38-kilometer, 6-lane freeway between Lima and Ricardo Palma. Project included the design of 5 interchanges, and the channelization of several kilometers of the Rimac River. **Client:** INVERMET

Chamaya – Jaen - San Ignacio Highway Construction, Peru, South America:

Construction Supervision Manager based on site for 4 years supervising the construction of 126 km of new paved highway in the northern Peruvian Andes mountains.

Client: Ministerio de Transportes y Comunicaciones.

Tegucigalpa to Juticalpa Highway, Honduras, Central America:

Chief Highway Engineer based in Tegucigalpa for 2 years for final design, plans and specifications for a new 180-kilometer paved highway in mountainous terrain. **Client:** World Bank.

PROJECTS IN THE UNITED KINGDOM

Road and Bridge Studies and Designs for Trevor Crocker & Partners: Managed several major studies and designs for roadway improvements, including the Leatherhead Western Relief Road and Town-Centre Layout; the A52 Improvement in Nottingham, and PS&E for the Bramingham Road Expressway in Luton. Also responsible for inspection and structural analysis of numerous bridges in the London area, and preparation of Bridge Condition Reports.

Motorway and Bridge Design for Surrey County Council: Project Engineer for route location studies, preliminary and final designs, and PS&E for various sections of the M3 and M25 Motorways in the London area. Project Engineer for the design of bridges for a road-over-river crossing; a pedestrian overcrossing; and a thrust-bored tunnel under a railroad.

Building Structure Design, Coventry: Assigned to Structural-Design Department of Coventry County Borough, responsible for design of public building structures in the City, including complete design of 5-storey City Council office building.

Swimming Pools Construction, Coventry: Assistant Resident Engineer for the construction of Olympic-sized swimming pools for Coventry County Borough.

Civil Engineering Construction, Birmingham: Spent first 5 years of career working for a civil engineering contractor on numerous drainage and sanitary-sewer improvement projects in the Birmingham area.

BUSINESS DEVELOPMENT EXPERIENCE

Michael Baker, Jr., Inc., Beaver, PA: Business development experience started while working on assignment in Peru for Michael Baker, Jr. from 1974 to 1978. Worked with associated Peruvian consultant firm during this period, preparing proposals (in Spanish) for highway design and construction supervision projects in Peru.

From 1978 to 1981, worked in Michael Baker's Headquarters office on business-development assignments, in addition to performing other project management activities. A major accomplishment during this period was the preparation of a successful proposal and a winning presentation for the Los Bronces Mine Access Road Study in Chile, and the subsequent management of this project for the Exxon Corporation.

TAMS Consultants, Inc., New York, NY: Joined the International Business-Development Department of TAMS in 1981. Shortly thereafter, helped prepare the winning proposal for the design of the Lima-Chosica-Ricardo Palma Autopista in Peru, and went on to successfully manage the one-year project, based in Lima.

**BUSINESS DEVELOPMENT
EXPERIENCE (Continued)**

While working with TAMS International Business-Development group, made client contacts and prepared numerous proposals for potential work in Liberia, Africa; the Dominican Republic; St. Lucia; Guatemala, Turkey, Lebanon and Abu Dhabi. Some of these proposals were successful, but many were not due to competitive-cost factors.

TAMS Consultants, Inc., Seattle, WA: Reassigned in 1983 to TAMS Seattle Office to promote highway design work for the company on the \$1.3 billion I-90 Project. In 1983-84, prepared successful proposal and led winning interview for the I-90, Luther Burbank Lid Design Project. Went on to successfully manage this WSDOT project.

From 1983 to 1996, made client contacts; prepared numerous proposals; and led many interviews for highway studies and design work in Washington, Oregon, Arizona, California and Alaska for a variety of clients. Efforts resulted in providing a continuous workload of projects for a staff of approximately 20 persons in the Seattle office, plus a smaller-sized staff in offices in Phoenix, AZ and Concord and Fresno, CA. Major accomplishments included:

- Prepared TAMS first winning proposal and interview for work with ODOT in Oregon, which led to 3 subsequent projects with ODOT.
- Prepared a winning proposal for the Outer Loop Freeway Project in Arizona which had gross fees exceeding \$5 million, and enabled TAMS to establish a 15-person office in the State for several years.
- Prepared a winning proposal and interview for work with the City of Placerville/Caltrans for the Highway 50 Project. This subsequently led to successful submittals and interviews for about 12 other Caltrans projects, and enabled TAMS to establish offices in Fresno and Concord for a number of years.
- Established client contact and prepared winning proposals and interviews for the Andersen Drive Extension Project in San Rafael, which went on for about 10 years, and led to work on two other projects for the City.
- Built on solid client relationships established with WSDOT staff to subsequently win a lot more work with WSDOT.
- Established new client relationships and made winning submittals and presentations to new clients in Washington State, including King County, Pierce County, Kitsap County and Thurston County.

Kato & Warren, Inc., Seattle, WA: Following TAMS' decision to close their Seattle office in 1996, arranged for the successful purchase of TAMS' Seattle Office by Kato & Warren, Inc. and became a Principal of that firm.

BARRY S. KNIGHT, PE, CENG, MICE

BUSINESS DEVELOPMENT EXPERIENCE (Continued)

As one of four Principals of Kato & Warren, worked on business-development activities for the next 4 years, and helped to achieve phenomenal growth of the firm. Most of this growth was in the transportation sector, as a direct result of the TAMS acquisition. During this period, the firm grew from a 6-person firm to a 36-person firm, and the value of the firm went from approximately \$300,000 to \$1.5 million.

Significant business-development activities by Mr. Knight during this period included establishing client contacts; preparing successful proposals and winning interviews (when called for) for the following:

- South 154th Street/156th Way Relocation Project with the Port of Seattle (\$1.3 million fee).
- Oakesdale Avenue SW Extension Project with the City of Renton (\$1.2 million fee).
- Coal Creek Parkway, Phase 1 with the City of Newcastle (\$950,000 fee).
- Britton Parkway Study and PS&E with the City of Lacey (\$330,000 fee)
- Slater Avenue NE Improvement with the City of Kirkland (\$350,000 fee)
- On-Call PS&E Design Services Agreement with WSDOT (\$250,000 fee).

In addition to the above, Mr. Knight established relationships with representatives of FHWA's Western Federal Lands Highway Division, and was able to secure task orders with WFLHD under an IDIQ contract that amounted to over \$2.5 million in fees over a 5-year period.

In 1996, Kato & Warren was sold to TranSystems Corporation since the two founding Principals (Rich Kato and Dick Warren) wanted to retire.

TranSystems Corporation, Seattle, WA: In October 2000, the Kato & Warren staff merged with the smaller TranSystems staff that had previously been based in Bellevue, and the combined group started to operate out of Kato & Warren's office in Seattle.

As a Principal of the firm, Mr. Knight was expected to generate fees of at least \$1.5 million/year. In the 1.5-year period since the transition to TranSystems began, his accomplishments include:

- Prepared winning submittal that resulted in the firm's selection for award on a new IDIQ Contract for A/E Design Work with FHWA's Western Federal Lands Highway Division valued at \$5 million over 5 years.
- Prepared winning submittal for I-5, SR 18, SR 161 Triangle Interchange Design Study with WSDOT valued at \$300,000.
- Prepared winning submittal for On-Call Transportation Studies Agreement with WSDOT valued at \$350,000.

BARRY S. KNIGHT, PE, CENG, MICE

- BUSINESS DEVELOPMENT EXPERIENCE (Continued)**
- Negotiated add-ons to the Coal Creek Parkway Contract valued at \$236,000.
 - Negotiated add-on to the South 154th Street/156th Way Relocation Contract valued at \$100,000.
 - Negotiated add-on to On-Call PS&E Design Services Agreement with WSDOT valued at \$75,000.
 - Obtained on-call assignment for South Sequim Avenue Design Review with City of Sequim valued at \$40,000.

CTS Engineers, Bellevue, WA: Since June 2002, Mr. Knight has been responsible for business development at CTS Engineers. In this capacity, he has focused on obtaining roadway design work in the public sector.

His accomplishments include:

- Negotiated supplemental agreements on Sound Transit's Link Light Rail Project amounting to over \$2.5 million.
- Prepared winning submittal for downtown street improvements in Gig Harbor valued at \$432,961.
- Prepared winning submittal for SR 161, Town-Center & Corridor Improvements in Eatonville, WA valued at \$288,000.
- Secured work with WSDOT on several On-Call contracts; with Idaho Transportation Department for SH-33, Main Street Improvements in Driggs, ID; and 4 projects with Juneau CBD (as subconsultant).

REFERENCES

Available upon request.

Claudia S. Hirschey, P.E.
Senior Transportation Engineer
12527 SE 72nd Street
Newcastle, WA 98056
claudiahirschey@comcast.net
206-856-4988

Education

M.S., Civil Engineering, 1985
University of Wyoming

B.S., Mechanical Engineering, 1980
University of Washington

Registrations

Professional Engineer, Washington
(25806), 1989

Professional Engineer, Oregon (18381),
1996

Employment History

Transportation Consulting Services
(owner)

Heffron Transportation, Inc.

David Evans and Associates, Inc.

CH2M Hill

Washington State Department of
Transportation

Professional Affiliations

Institute of Transportation Engineers
(ITE), since 1984

Women's Transportation Seminar
(WTS), Puget Sound Chapter. (Past
President), since 1987

King County Boundary Review Board,
since 2002. Chair in 2008 and 2009.

Training and Presentations

*Resolving Conflict and Building
Consensus, Cascade Center for Public
Service and Leadership, 2007*

*High Occupancy Toll (HOT) Lanes,
Legislative and Policy Issues, Institute of
Transportation Engineers (ITE),
Washington State Meeting, Bellevue,
Washington June, 2004*

*HOV Direct Access, A Design for
Regional and Community Benefit,
Institute of Transportation Engineers
(ITE), International Conference, Seattle,
Washington, August 2003*

*Major Corridor Investment: A Puget
Sound Case Study, 2001 International
Conference, Institute of Transportation
Engineers (ITE), Chicago, Illinois,
August, 2001.*

*State Route 14 Corridor Management
Plan, 1998 Northwest Quad Conference,
Institute of Transportation Engineers
(ITE), Seattle, Washington, April, 1998.*

Summary of Qualifications

Ms. Hirschey has over 30 years of experience in transportation planning, operations, and engineering design. Her strong management skills have been applied to a wide variety of projects, from strategic planning through project design. She has been responsible for high-occupancy vehicle (HOV) freeway corridor studies, transit center and commuter rail station planning, freight mobility planning, parking studies, management of pre-design for arterial and highway improvements, NEPA/SEPA transportation analysis, and bicycle and pedestrian facility planning. Ms. Hirschey has a thorough understanding of transportation policy, operations, and design, in a multi-modal environment.

Project Management Experience

- Clark County Freight Mobility Study, Regional Transportation Council, WA
- Columbia River Crossing, Freight Element, Vancouver, WA and Portland, OR
- Seattle Community Parking Studies – 2008, 2009 & 2010, completed 18 neighborhood parking studies
- East Duwamish Waterway Bridge Replacement and 15th Avenue NE Bridge Rehabilitation, Transportation Analysis, Seattle Department of Transportation
- McClellan Light Rail Transit Station and Bus Layover Analysis, Office of Management and Planning, City of Seattle
- Tacoma Narrows Bridge 24th Street Electronic Toll On-Ramp, Transportation Discipline Report, NEPA/SEPA Addendum, WSDOT
- Narrowsgate Land Use Study, Tacoma Narrows Bridge Project, WSDOT
- Sound Transit, Sammamish Park-and-Ride Lot, Plans, Specifications, and Estimate (PS&E) Final Design Project, Sammamish, Washington
- Sound Transit, Sammamish Park-and-Ride Lot, Site Selection and Pre-design, Sound Transit, Sammamish, Washington
- Sound Transit Kirkland Projects: Totem Lake HOV Direct Access, Transit Center, and Park-and-Ride Improvements, Kirkland, Washington
- Corridor Needs Study for East King County (CONEKC), Seattle, Washington
- I-405 HOV Direct Access Study (Puget Sound HOV Predesign Studies), WSDOT

Transportation Planning and Engineering Experience

- WSDOT SR 16 Tacoma Narrows Bridge to SR 3 Congestion Study; freight, transit, and non-motorized elements, Kitsap and Pierce Counties, Washington
- Sound Transit Kent and Auburn Station Access Improvements
- West Seattle Bridge Corridor Congestion Management Study, Seattle, Washington
- Roosevelt to Downtown HCT Project Definition, Seattle, Washington
- Sound Transit Long Range Plan Update, SEIS, Access and Land Use Issue Papers
- Port of Centralia Interchange Justification Report, Centralia, Washington
- Sound Transit Lynnwood Link Alternatives Analysis, EIS, and design support
- Sound Transit Lynnwood to Everett High Capacity Transit Corridor Study
- Investment-Grade Traffic and Tolling Revenue Analysis Services for the Columbia River Crossing Project, WSDOT and ODOT

Claudia S. Hirschey, P.E.

Page 2

- South Lake Union Investment Strategy, Seattle, Washington
- 4th Avenue S Pedestrian Improvements, Seattle, Washington
- 1st Avenue South Improvement Study, Seattle, Washington
- Seattle Transit Network Strategy, Seattle City Council Transportation Committee
- East D Street to South M Street Commuter Rail Line Extension Feasibility Review and NEPA Re-evaluation Analysis, Sound Transit, Tacoma, WA
- Sound Transit, Tukwila Commuter Rail Station Relocation, Transportation Element, Tukwila, WA
- Freight Action Strategy (FAST) Corridor Project Update, WSDOT and PSRC
- SR 167 Corridor Plan, Freight Element, WSDOT
- Sound Transit, Lakewood Commuter Rail Station Design, Traffic and Transportation Engineering Element, Lakewood, WA
- WSDOT I-5 Mellen Street, Truck Element, Centralia, WA
- 1st Avenue South Improvement Study, Seattle, Washington
- Immunex (AMGEN) Corporation Headquarters at Pier 88 Streetcar Extension Study, Seattle Washington
- Greenwood Transportation Plan, Seattle, WA
- West Marginal Way Bike Path, Transportation Analysis, Seattle, WA
- South Campus Infrastructure Development Predesign for Western Washington University, Bellingham, Washington
- Community Partnership Project, WSDOT, Olympia, Washington

Past Community Service

- City of Newcastle Planning Commissioner, 2006 - 2008
- Lake Heights Family YMCA (Board of Directors), 2000 – 2006, involved with facility planning and capital campaign for the new full service YMCA in Newcastle, opened September, 2009
- Land Use, Transportation, Air Quality, and Health Advisory Committee, King County Executive's Office, 2001-2005
- City of Newcastle (Deputy Mayor), Newcastle, Washington, 1998-2001
- Regional Transit Committee (King County Suburban Cities Representative), 1998-2001
- Value Pricing Conference, Steering Committee, 2000

SCOTT KUZNICKI, PE
DIRECTOR, MOBILITY TECHNOLOGY SOLUTIONS



scott.kuznicki@transpogroup.com



Scott is a traffic engineer and project manager with extensive public agency and private practice experience in policy development, planning, design, construction, and operations. He possesses a comprehensive knowledge of all aspects of transportation system management and operations. His expertise is an asset to public and private clients around the globe and is viewed as a vital part of the ongoing work of numerous transportation policy and research organizations.

EXAMPLES OF HIS PROJECT WORK INCLUDE:

- **Burke-Gilman Trail Design Evaluation, Seattle, WA**
Working with Transpo's swept-path analysis experts as project manager, Scott led his team in the preparation of hundreds of swept path analyses for commercial driveways along a proposed trail alignment. In this work, he demonstrated how bicyclist and pedestrian safety would be impacted by the anticipated turning vehicle movements.
- **Self-Driving Transport Road Map, Washington State DOT**
Working with the WSDOT, Scott is the project manager developing the first-ever Self-Driving Transport Road Map for the State of Washington. In support of the governor's initiative intended to facilitate the development and deployment of autonomous, connected, electric, and shared vehicles in Washington State, the SDT Road Map is a crucial aid for policymakers and DOT officials.
- **Mitigation Program Management, City of Mercer Island, WA**
As Program Manager, Scott is currently overseeing the development of a mitigation program for the City of Mercer Island. This program will protect the City's vibrant, walkable Town Center from the negative impacts of vehicular traffic pattern changes related to the construction of the Sound Transit East Link light rail line, ensuring that livability and safety continue to support transit-oriented development along the critical I-90 corridor.
- **Introducing Human Factors in Roadway Design and Operations**
Scott is a registered instructor with the NHI and is presently contracted to teach the Human Factors in Transportation Engineering course with two other human factors professionals.
- **Enhancing Safety and Operations in Complex Interchanges**
On this project, Scott directed the research planning activities, and preparation for field data collection and driving simulator testing operations. He was responsible for ensuring that roadway, driver, and vehicle elements were considered in the human factors evaluations and developed all of the traffic control devices and roadway geometry for the testing scenarios.
- **Alaskan Way Viaduct and Seawall Replacement Program**
Scott proficiently supervised nearly US \$2 million worth of contract document preparation and project support services. He personally sealed over 500 contract plan sheets and provided oversight of the successful delivery of numerous contract plan sets for construction and support of construction activities, including change orders, cost estimation. Additionally, he developed leading-edge methods for providing information in tunnels, including new applications of overhead signs and tunnel systems equipment using emerging technologies.

AREAS OF EXPERTISE

- Transportation Operations and Safety Analysis
- Roadway Design and Contract Preparation
- Corridor Planning and Transit Planning
- Operations Analysis and Travel Demand Modeling
- Multimodal Transportation Planning

EDUCATION

BS Civil Engineering
University of Wisconsin – Platteville
Platteville, Wisconsin

LICENSURE

Registered Professional Engineer in three states, including Washington State

EMPLOYMENT HISTORY

Feb 2017 to Present
Transpo Group
Director, Mobility Technology Solutions

2008 - 2017
Modern Traffic Consultants
President & Managing Engineer

2016
Toxcel
Practice Leader for Transportation Engineering

2014 - 2016
Toxcel
Director of Traffic Engineering

2007 - 2012
Parsons Brinckeroff
Lead Traffic Engineer

2006 - 2007
Parsons Brinckeroff
Senior Traffic Engineer

2000 - 2006
Illinois Department of Transportation
Civil Engineer

1998
Minnesota Department of Transportation
Engineering Paraprofessional

- **Burke-Gilman Trail Design | City of Seattle, WA | Deputy Project Manager**
As the Deputy Project Manager for this project, Scott led the engineering design team in preparing plans for signing, pavement markings, and appurtenances related to an alignment of the trail along Leary Way NW in Ballard that included a special design for a railway crossing, passive bicycle detection at traffic signals, and cutting-edge implementations of pavement markings for wayfinding at intersections.
- **Active Traffic Management Systems and Express Lanes Planning and Pre-Design**
Scott contributed to the scoping, concept of operations, and preliminary design for WSDOT's Active Traffic Management Systems and Express Lanes, including human factors evaluations of driver workload and driver behavior related to toll rate signing and active traffic management systems.
- **Honolulu Rail Transit Program**
On this US \$1.2-billion design/build project, Scott represented the owner in contract enforcement and interpretation, design review and resolution, and coordination with partner agencies. He provided owner review of contract plans for the fully-automated fixed-guideway system design.
- **Transpo Group**
Scott leads the Middle East business development and project director activities, ensuring a high level of client satisfaction related to Transpo Group's work in automated and connected vehicles technology development and deployment, transportation systems operation and management integration with emerging technologies, and user information systems applications.
- **Modern Traffic Consultants**
In his private practice, Scott managed all pursuits, contract development, and contract administration, in addition to successfully completing all technical work. He has prepared traffic studies for a variety of clients in Washington State and South Dakota, evaluated traffic safety and operations for local agencies, including road diets and bicycle facility improvements.
- **Toxcel**
Scott served as the global Transportation Engineering Practice Leader. In this role, he managed federal projects and led business development activities and major pursuits. He has provided leadership in the successful delivery of FHWA contracts, NCHRP research, and expert witness work, in addition to supporting technical program delivery for several USDOT initiatives. Mr. Kuznicki prepared facilitated workshops and scanning tours, prepared technical reports, and collaborated with clients in the production of materials for use by government officials, policy professionals, and planners and engineers.
- **Parsons Brinckerhoff**
Scott successfully completed numerous assignments as a project manager and technical services leader.
- **Illinois Department of Transportation (District 1)**
Scott worked in the maintenance, bridge, and traffic design offices. As Area Traffic Field Engineer for five years, he interacted with the public and other agency staff, ensuring safe and efficient operations on roadways in a 300-square-mile area while developing asset management program and policy briefs.
- **Minnesota Department of Transportation (District 6)**
Scott developed and implemented a program for populating a GIS-based database with GPS location, inspection, and rating of hydraulic structures and performed land surveying and construction surveying.

PRESENTATIONS & PUBLICATIONS

Reading the Road Ahead: Infrastructure Readiness, Kuznicki, S. Workshop Leader, Automated Vehicles Symposium 2017, San Francisco, CA

Advancing Automated Transport in the Middle and Addressing Challenges Worldwide. Plenary Session, Automated – Kuznicki, S., Vehicles Symposium, AUVSI and TRB. San Francisco, CA, 2017.

Infrastructure Readiness and Integration for Automated Transport. – Kuznicki, S. Organizing Official and Presiding Officer, Automated. Vehicles Symposium, AUVSI and TRB. San Francisco, CA, 2017.

Rural Road Safety Research: Practical Applications. – Kuznicki, S., Organizing Official and Presiding Officer, Session 516, 96th Annual Meeting of the TRB. Washington, DC, January 2017.

N. Enhancing Safety and Operations in Complex Interchanges. – Katz, B., Kuznicki, S., Miller, S., Kehoe, Final Project Report. FHWA, Washington, DC, 2017.

Evaluation and Recommendations for Design Consistency of Guide Signs. – Katz, B., Kissner, E., Kuznicki, S., Shurbutt, J., Paper 17-04477, Proceedings of the 96th Annual Meeting of the TRB. Washington, DC, 2017.

Using Unmanned Aerial Systems in Transportation Operations Research. – Kuznicki, S., Katz, B., Shurbutt, J., Kehoe, N., Cobb, D., Paper 17- 00709, Submitted for the 96th Annual Meeting of the TRB. Washington, DC, 2017.

Designing for People: Unlocking Human Behavior to Build a Better Transportation System. – Katz, B., Kuznicki, S., Kissner, E., ITE Journal. Part 2 of 2, August 2016.

Ambiguous Infrastructure: When Signing and Pavement Markings Don't Make Sense to Drivers or Machines. – Kuznicki, S. Presentation Session, Automated Vehicles Symposium, AUVSI and TRB. San Francisco, CA, 2016.

PRESENTATIONS & PUBLICATIONS CONT'D

Designing for People: Unlocking Human Behavior to Build a Better Transportation System. – Miller, S., Kuznicki, S. ITE Journal. Part 1 of 2, May 2016.

Highway Safety Improvement Program Final Report. – Kuznicki, S., Iburguen, B., Symoun, J., Pavao, P., FHWA-SA-16-024, Washington, DC, April 2016.

Rural Road Safety Research: Practical Applications. – Kuznicki, S., Giancola, A. Organizing Official and Presiding Officer, Session 211, 95th Annual Meeting of the TRB. Washington, DC, January 2016.

Designing for Consistency: Matching Applications to Scenarios in the Use of Traffic Control Devices / Pavement Markings. – Kuznicki, S. and Katz, B. Paper 164, Proceedings of the 5th International Symposium on Highway Geometric Design. Vancouver, BC, Canada, 2015.

Designing for Consistency: Matching Applications to Scenarios in the Use of Traffic Control Devices / Signing.– Kuznicki, S. and Katz, B., Paper 163, Proceedings of the 5th International Symposium on Highway Geometric Design. Vancouver, BC, Canada, 2015.

Database-Driven Implementation for Future Editions of the MUTCD. – Kuznicki, S. and Avery, R., Paper 14-0448, Proceedings of the 93rd Annual Meeting of the TRB. Washington, DC, 2014 (Presented at the 93rd Annual Meeting of the TRB, the July 2014 Joint Meeting of the Western and Midwestern Districts of ITE, and the January 2015 meeting of the National Committee on Uniform Traffic Control Devices.)

Getting Around to Signing. Roundabouts Now. – Kuznicki, S. April 2012.

Evaluating Pavement Marking and Signing Characteristics and Asset Management Approach for Traffic Sign Maintenance.– Kuznicki, S., Presiding Officer, Session 261, 90th Annual Meeting of the TRB. Washington, DC, 2011.

Challenges in Design, Selection, and Placement of Traffic Control Devices: TRB Human Factors Workshop Series. – Kuznicki, S., Workshop Organizer and Chair, 89th Annual Meeting of the TRB, January 2010

Signing of Option Lanes on Freeways and Expressways.– Kuznicki, S., (Presented at the 89th Annual Meeting of the TRB to the Traffic Control Devices Committee (AHB50), January 2010)

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Victor H. Bishop, P.E., Traffic Engineer

Mr. Bishop is the owner and Principal Consultant for VHB Consulting, PLLC. Mr. Bishop formed this firm in 2007 after a 39 year career as President of Transportation Planning & Engineering, Inc., (TP&E) a traffic engineering consulting firm in Bellevue, WA, and as Principal Traffic Engineer for Mirai Transportation Planning and Engineering in Kirkland, WA.

Mr. Bishop was principal-in-charge or project manager on most of TP&E's major projects in the areas of traffic impact analysis, circulation planning, parking layout and traffic control device design and non-motorized transportation planning. He has 40 years experience in the field of transportation planning and traffic engineering working with both the private and public sectors on a wide range of traffic engineering projects in Western Washington.

Areas of Expertise

- Traffic Engineering
- Traffic Impact Analysis
- Traffic Design
- Non-Motorized Planning and Design
- Safety Programs
- Detour Evaluation

Education

BSCE University of New Hampshire, 1962
MSCE University of Washington, 1966

Professional Registration

Licensed in Civil Engineering, State of Washington No. 10350

Professional Affiliations

Institute of Transportation Engineers, Life Member,
Past President, Washington State Section
American Society of Civil Engineers, Life Member
American Public Works Association, Life Member

Honors and Awards

1986 "Outstanding Service Award", ITE, Washington State Section
Automotive Safety Foundation Fellowship, University of Washington,
Master of Science program in Traffic and Transportation Engineering