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5	BEFORE THE HEARING EXAMINER CITY OF SEATTLE				
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7	In the Matter of the Appeal of:	Hearing Examiner File			
8	THE BALLARD COALITION	W-17-004			
9	Of the adequacy of the Final Environmental	CASCADE BICYCLE CLUB'S SECOND PRELIMINARY LIST OF WITNESSES			
10	Impact Statement, prepared by the Seattle Department of Transportation for the Burke-				
11	Gilman Trail Missing Link Project,				
12	Appellants.				
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15	The Cascade Bicycle Club ("CBC") su	bmits the following preliminary list of witnesses.			
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19	claims and CBC's responsive witness list is based on preliminary information currently available				
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21	to CBC, including Appellant's notice of appeal. CBC reserves the right to amend, refine, or expand its list as Appellant develops its claims and following completion of discovery.				
22	expand its list as Appendix develops its claims	and ronowing completion of discovery.			
23	PRFLIMINA	DV WITNESSES			
24	PRELIMINARY WITNESSES CBC's preliminary witness list is set forth below. If for any reason, any of the listed				
25					
26	witnesses becomes unavailable for hearing, CBO	reserves the right to substitute another witness			

with similar qualifications, expertise, or familiarity with the issues on review. CBC may decide not 1 to call one or more witnesses listed, if determined not to be necessary after the presentation of .2 Ballard Coalition's case in chief, and CBC reserves the right to add or delete any witnesses at the 3 time it submits its final witness list or as otherwise authorized by the Hearing Examiner. Finally, 4 CBC reserves the right to call rebuttal witnesses who are not listed below and to call as a witness 5 any of the witnesses listed by the other parties. Any of the potential witnesses identified may be 6 contacted through CBC's attorneys. 7

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

W-17-004

I	bicycle and pedestrian commuting through Ballard due to current safety issues in the area of the				
2	Missing Link Project under the no-build alternative, the importance of the connected regional				
3	trail system, and the potential safety improvements that will result from the Project.				
4	4. Other witnesses as determined after review of information provided in response to				
5	discovery requests promulgated to the Ballard Coalition.				
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7	5. Witnesses listed on the preliminary and final witness lists of the other parties.				
8	6. Witnesses in rebuttal to evidence introduced by the Ballard Coalition. As				
9	indicated above, CBC reserves the right to call additional expert witnesses to rebut Appellant's				
10	evidence and claims that are disclosed through discovery or that Appellant advances at hearing.				
11	D-4-14h: 114-1				
12	Dated this 11th day of October, 2017.				
13	STOEL RIVES LLP				
14	Matthe Ole				
15	Matthew Cohen, WSBA #11232 Rachel H. Cox, WSBA #45020				
16	600 University Street, Suite 3600				
17	Seattle, WA 98101 Phone: (206) 386-7569				
18	Fax: (206) 386-7500				
19	Email: <u>matthew.cohen@stoel.com</u> Email: <u>rachel.cox@stoel.com</u>				
20	Attorneys for Intervenor Cascade Bicycle Club				
21	Thomas for intervenor cuscude Dicycle Club				
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CERTIFICATE OF SERVICE

2	I certify that on this date of October 11, 2017, I electronically filed a copy of the				
	reering that on this date of October 11, 2017, refectionically flied a copy of the				
3	foregoing document with the Seattle Hearing Examiner using its e-filing system. I also certify				
4	that on this date I caused to be served a true and correct copy of the foregoing on the following				
5					
6	persons in the manner listed below:				
7	Joshua C. Brower		Via U.S. 1st Class Mail		
1	Danielle N. Granatt	\boxtimes	Via E-mail		
8	Leah B. Silverthorn		josh@verislawgroup.com		
0	Veris Law Group PLLC		danielle@verislawgroup.com		
9	1809 Seventh Ave., Suite 1400		leah@verislawgroup.com		
	Seattle, WA 98101				
10	Tel: 206-829-9590		megan@verislawgroup.com		
10			Via Fax		
11	Fax: 206-829-9245		Via Overnight Delivery		
	Attorneys for Plaintiff/Petitioner				
12	•				
	The Appellant Coalition				
13					
1.4	Patrick J. Schneider		Via U.S. 1st Class Mail		
14	Foster Pepper PLLC	\boxtimes	Via E-mail		
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15	Seattle, WA 98101-3292		brenda.bole@foster.com		
1.0	Tel: 206-447-2905				
16	Fax: 206-749-1915		Via Fax		
17	rax. 200-749-1913		Via Overnight Delivery		
1 /	Attorneys for Plaintiff/Petitioner				
18	· · · · · · · · · · · · · · · · · · ·				
10	The Appellant Coalition				
19	P.J. P. P.				
	Erin E. Ferguson		Via U.S. 1st Class Mail		
20	Asst. Seattle City Attorney	\boxtimes	Via E-mail		
	Land Use Section - Civil Division		erin.ferguson@seattle.gov		
21	Office of the Seattle City Attorney		alicia.reise@seattle.gov		
	701 Fifth Ave., Suite 2050		Via Fax		
22	Seattle, WA 98104-7097				
	Tel: 206-684-8615		Via Overnight Delivery		
23	101. 200-004-0013				
24	Attorney for Defendant				
	City of Seattle Department of Transportation				
25	•				
26					

CBC SECOND PRELIMINARY LIST OF WITNESSES W-17-004

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I	Tadas A. Kisielius		Via U.S. 1st Class Mail		
2	Dale Johnson	\boxtimes	Via E-mail		
2	Clara Park		tak@vnf.com		
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5	Seattle, WA 98104		cpark@vnf.com		
4	Tel: 206-623-9372		map@vnf.com		
			Via Fax		
5	Attorneys for Defendant		Via Overnight Delivery		
_	City of Seattle		, 100 0 , 01111B110 12 011 , 01)		
6					
7	I certify under penalty of perjury under the laws of the state of Washington that the				
8	foregoing is true and correct.				
9	DATED: October 11, 2017 at Seattle, Washin	ngton.			
10					
11		Sharmon D.	Loomis, Practice Assistant		
12		STOEL RIV			
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