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BEFORE THE HEARING EXAMINER
CITY OF SEATTLE

In the Matter of the Appeal of:

Hearing Examiner File

THE BALLARD COALITION

W-17-004

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

THE BALLARD COALITION'S FINAL DISCLOSURE OF WITNESSES AND EXHIBITS

The Ballard Coalition submits the following witness and exhibit list:

I. EXPERT WITNESSES

1. Victor H. Bishop, P.E., Traffic Engineer, VHB Consulting, PLLC. Mr. Bishop will 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. A copy of Mr. Bishop’s resume
2 was previously provided and admitted into the Record as Hearing Examiner Exhibit 11 and an
3 updated copy was previously provided.

4 2. Claudia S. Hirschey, P.E., Senior Transportation Engineer. Ms. Hirschey will
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 was previously provided.

15
16
17 3. Barry S. Knight, P.E. Mr. Knight may testify regarding his work and opinion
18 related to the design and constructability of an elevated structure to be used as a multi-use path
19 for the Missing Link within a portion of the “study area” as that term is defined in the FEIS, and
20 the approximate cost to do so.¹ A copy of Mr. Knight’s resume was previously provided.

21
22 4. Scott O. Kuznicki, PE, Director of Safety and Mobility Solutions, transpogroup.
23 Mr. Kuznicki will testify regarding his work and opinion related to performing autoTURN
24 analysis for driveways along the Missing Link, parking, safety, trail design, and video and

25

¹ Mr. Knight is hereby also designated as a fact Witness and will not be listed below to avoid repetition.

1 animation exhibits all related the DEIS and the FEIS.² A copy of Mr. Kuznicki's resume was
2 previously provided.

3 5. Spencer Cohen, Ph.D., Community Attributes Inc. Mr. Chohen will testify regarding land
4 use; the Land Use sections of the DEIS and FEIS; land use compatibility; land use impacts from
5 the Missing Link; and the Economic Discipline Report in the DEIS, FEIS, and drafts of that
6 report. A copy of Mr. Cohen's resume was previously provided.
7

8 II. WITNESSES

9 1. Paul Nerdrum, Salmon Bay Sand & Gravel, Co. Mr. Nerdrum may testify
10 regarding impacts to his businesses and properties arising from the project, including, without
11 limit: traffic-hazards, traffic delays, safety impacts, safety concerns, traffic hazard concerns,
12 access impacts, economic impacts to his business and properties, impacts to the use and
13 maintenance of his properties, compatibility of the project with land uses that are unique to his
14 properties, cumulative impacts, parking, the segment of the Burke-Gilman Trail located adjacent
15 to and in front of his businesses and properties and to Ballard in general.
16

17 2. Warren Aakervik, Ballard Oil Company. Mr. Aakervik may testify regarding
18 impacts to his businesses and properties arising from project, including, without limit: traffic-
19 hazard impacts, traffic delays, safety impacts, safety concerns, traffic hazard concerns, access
20 impacts, parking impacts, impacts to the use and maintenance of his properties; economic
21 impacts to his business and surrounding land uses; compatibility with land uses that are unique to
22 the segment of the Burke-Gilman Trail located adjacent to and in front of his businesses and
23
24

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

1 properties and to Ballard in general; freight mobility in Seattle; the maritime industrial economic
2 sector in Seattle; and how roadway design impacts his business and freight mobility in general.

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

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

18 5. Nicole Grant or Katie Garrow, the Martin Luther King, Jr. County Labor Council
19 of Washington, AFL-CIO. Ms. Grant or Ms. Garrow may testify regarding project-induced
20 impacts to member unions and member union's members, including, without limit: economic
21 and business related impacts, employment impacts, business operation impacts, land use impacts,
22 safety concerns, traffic hazard concerns, the Preferred Alternative, other alternatives, trail usage,
23 lost parking and parking changes, construction related impacts, access concerns, use and
24 maintenance of properties on which businesses employing union members are located,
25

1 cumulative impacts, and compatibility with land uses that are unique to this area of Ballard and
2 to Seattle in general.

3 6. Craig Hatton or Ellen Hatton, Hatton Engine & Generator Systems, Inc. Mr.
4 Hatton or Mrs. Hatton may testify regarding impacts to Hatton and its property arising from the
5 project, including, without limit: traffic-hazards, traffic delays, safety impacts, traffic hazard
6 impacts, safety concerns, access impacts, impacts to the use and maintenance of CSR's property,
7 business and economic impacts to Hatton, and compatibility of the Missing Link with land uses
8 that are unique to the segment of the Burke-Gilman Trail located adjacent to and in front of
9 Hatton and its properties and to Ballard in general.

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

17 8. Peter Schrapen, Director of Government Affairs, Northwest Marine Trade
18 Association. Mr. Schrapen may testify regarding project-induced impacts, including, without
19 limit: to NMTA's members and their businesses and properties arising from traffic-hazards,
20 safety impacts, lost parking and parking changes, incompatible land uses, impacts to water-
21 related and water-dependent businesses, safety concerns, access impacts, use and maintenance of
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1 properties owned or operated by NMTA members, and compatibility with land uses that are
2 unique to the segment of the Burke-Gilman Trail located in Ballard and Seattle in general.

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

10 10. Timothy Olstad and/or Bill Herzberg, Commercial truck Drivers. Mr. Olstad
11 and/Mr. Herzberg may testify regarding project-induced impacts, including, without limit:
12 access, driveways, safety concerns, traffic hazards, traffic hazard concerns, traffic delays, access
13 delays, vehicle operations, alternatives, business impacts, land use impacts, lost parking and
14 parking changes, construction related impacts, access to/from, use and maintenance of SBS&G
15 properties, conflicts with cyclists and trail users, and compatibility of the Missing Link with land
16 uses that are unique to the segment of the Burke-Gilman Trail located adjacent to and in front of
17 SBS&G and its properties.
18

19 11. Brian McGarvey, avid cyclist. Mr. McGarvey may testify, without limit, his
20 experience and knowledge regarding cycling in Seattle on sharrows, marked lanes, protected
21 bicycle facilities, mixed-use trails, and in industrial areas; safety and traffic hazard experiences
22 and concerns related to his experiences and knowledge biking in these areas/on these types of
23 facilities, and issues and concerns related to driveways, industrial and commercial traffic,
24
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1 vehicles, traffic, traffic hazards and conflicts between cyclists, trail users and heavy industrial
2 vehicles and traffic.

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

9 13. Ron Scharf, Seattle Department of Transportation, Senior Project Manager. Mr.
10 Scharf may be asked about SDOT's process to scope, choose alternatives, and complete the Draft
11 Environmental Impact Statement and Final Environmental Impact Statement, working with
12 SDOT's consultants, the community, comments, and the contents, analysis, and conclusions in
13 the DEIS and FEIS.
14

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

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

1 16. Mark Johnson, Environmental Science Associates. Mr. Johnson may be asked
2 about his expertise, his work, work-product, management, participation, findings, and SDOT's
3 process to the draft and complete the DEIS and FEIS, including, without limit, working with
4 SDOT, the community, comments, and the contents, analysis, and conclusions in the DEIS and
5 FEIS.
6

7 17. Erinn Ellig, Parametrix. Ms. Ellig may be asked about her expertise, her work,
8 work-product, participation, findings, and SDOT's process to the draft and complete the DEIS
9 and FEIS, including, without limit, working with SDOT, the community, comments, and the
10 contents, analysis, and conclusions in the DEIS and FEIS or any portion thereof.
11

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

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

23 20. Sharon Boswell or Eileen Heideman, SWCA Environmental Consultants. Ms.
24 Boswell or Ms. Heideman may be asked about their expertise, their work, work-product,
25 participation, findings, and SDOT's process to the draft and complete the DEIS and FEIS,
26

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

3 21. Roque DeHerrera and/or Brian Surratt, City of Seattle. Messrs. DeHerrera and/or
4 Surratt may be asked about his role and participation in completing the Missing Link, the DEIS
5 and FEIS, the City's DAC process, and the business, land use and economic impacts to Ballard-
6 area businesses from the Missing Link.
7

8 22. Blake Trask and/or Kelsey Mesher, Cascade Bicycle Club ("Cascade"). Mr. Trask
9 and/or Ms. Mesher may be asked about Cascade's relationship with SDOT in regards to
10 completing the Burke-Gilman Trail Missing Link, developing and selecting alternatives,
11 selecting SDOT's Preferred Alternative, and preparing and completing the DEIS and FEIS.
12

13 23. The Coalition reserves the right to name and designate additional witnesses
14 identified during discovery, which is on-going.

15 24. The Coalition reserves the right to name and designation additional witnesses
16 identified on the City's and Cascade's preliminary witness and exhibit lists.

17 25. The Coalition reserves the right to name and designation additional witnesses as
18 rebuttal witnesses.
19

20 II. EXHIBITS

21 Previously admitted Exhibits in W-08-0073⁴
22 Previously listed but not admitted Exhibits in W-08-007, including:
23 A-1 Watchel, Risk Factors (1994)

24 ⁴Pursuant to the Order, copies of these exhibits will not be provided because the City of Seattle Department of
25 Transportation (SDOT) and Cascade Bicycle Club (Cascade) are known to possess them, have possessed them, or
they are available to Cascade from its prior counsel or from SDOT pursuant to their Common Interest Agreement.

1 A-2 Wessels, R.A. Bicycle Collisions in WA State: A Six Year Perspective 1988-
-1993

2 A-6 Bishop, The Ballard Industrial Area & the Burke-Gilman Trail (3/25/2003)

3 A-7 Bishop, One Way Couplet Investigation (4/8/2003)

4 A-27 to A-34 Documents related to the Ballard Corridor Design Study, SDOT
(2003)

5 Previously admitted Exhibits in W-11-002⁵

6 Previously listed but not admitted Exhibits in W-11-002, including:

7 A-78 Atelier, Burke-Gilman Trail Redevelopment Study (October 2005)

8 A-80 Allen, Bicycle Sidepaths: Crash Risks and Liability Exposure: Evidence
from the Research Literature (2009)

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

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

11 A-83 Petritsch, Sidepath Safety Model: Bicycle Sidepath Design Factors

12 Affecting Crash Rates (3/21/2006)

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

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

15 A-89 Watchel and Lewiston, Risk Factors for Bicycle-Motor Vehicle Collisions
at Intersections (September 1999)

16 A-90 USDOT Characteristic of Emerging Road and Trail Users and Their Safety
(2004)

17 A-91 Franklin, Cycle Path Safety: A Summary of Research (2009)

18 Previously admitted Exhibits in W-12-002⁶

19 A-254.14-254.47 Photos

20 A-254.48 Mixer Truck diagram

21 ***

22 A-300 Arizona Bike Law (2013), Is It Really 20 Times More Dangerous?

23 A-302 Krizek, K. J., Estimating the Economic Benefits of Bicycling and Bicycle
Facilities

24 A-303 Landis, B. W., (2003), Intersection Level of Service for Bicycle Through
Movement

25 A-305 Jackson, N (2002), Bike Land Design Guide. Chicago, Pedestrian and Bicycle
Information Center

A-306 Pucher, J. (2001), Cycling Safety on Bikeways v. Roads.

A-307 Rasanen, M. (1998), Attention and Expectation Problems in Bicycle-Car
Collisions: An In-Depth Study

A-308 Sharples, R. (1995a and b), A framework for the evaluation of facilities for
cyclists⁷

A-309 Transpogroup, Memorandum, 5/16/2005, Burke-Gilman Trail Crossing Plan

A-310.1-310.10 Copies of documents and materials from V. Bishop's file produced to the
City and CBC, such as exhibits, diagrams, charts, tables, data-compilations and
photographs prepared or taken by V. Bishop, including, without limit the following:

A-310.1 Victor Bishop - CTS Final Report⁸

⁵ Known to be possessed by SDOT and available to Cascade from its prior counsel or from SDOT pursuant to their
Common Interest Agreement.

⁶ Known to be possessed by SDOT and available to Cascade from its prior counsel or from SDOT pursuant to their
Common Interest Agreement.

⁷ Publically available.

- 1 A-310.2 Victor Bishop - Sidepath Score Chart
 2 A-310.3 Victor Bishop - Sidepath Rating System, 10-30-2017
 3 A-310.4 Victor Bishop - Sidepath - The Results of the Rating System
 4 A-310.5 Victor Bishop - 2017-08-14 - Burke Gilman - 24th Ave NW to 22nd Ave
 5 NW
 6 A-310.6 Victor Bishop - Parking Evaluation, BGT FEIS
 7 A-310.7 Victor Bishop - Ballard Mill Marina Count Hourly data, 2017
 8 A-310.8 Victor Bishop - CTS ELEVATED SECTION for Bike Bridge⁹
 9 A-310.9 Victor Bishop - CTS Plan Sheets of Bike Bridge¹⁰
 10 A-310.10 Victor Bishop - Ballard Mill Marina 9.ASF
 11 A-311.1-311.10 Copies of documents and materials from C. Hirschey's file produced to
 12 the City and CBC, such as Exhibits, diagrams, report(s), memoranda and photographs
 13 prepared or taken by C. Hirschey, including, without limit the following:
 14 A.311.1 Claudia Hirschey - VisionZeroPlan
 15 A.311.2 Claudia Hirschey - Vancouver_design-guidelines-for-all-ages-and-
 16 abilities-cycling-routes
 17 A.311.3 Claudia Hirschey - Vancouver email_ Bicycle Safety - bicycle facility
 18 crossing of active industrial driveways
 19 A.311.4 Claudia Hirschey - SBMP_21March_FINAL_full doc
 20 A.311.5 Claudia Hirschey - NCHRP Guide to Bicycle Safety Counter Measures
 21 13897
 22 A.311.6 Claudia Hirschey - MassDOT_Bicycle_Chapter4_Intersections
 23 A.311.7 Claudia Hirschey - Be Friends_Truck and Bicycle conflicts_UW Urban
 24 Design Paper
 25 A.311.8 Claudia Hirschey - Appendix 4_Sidepath Rating System, 10-12-2017
 A.311.9 Claudia Hirschey - Appendix 3_http___commuteorlando (2)
 A.311.10 Claudia Hirschey - Appendix 3_http___commuteorlando
 A.311.11 Claudia Hirschey - Appendix 2_2017-09-15 - Burke Gilman - Conflict
 Diagram (1)
 A.311.12 Claudia Hirschey - Appendix 2_2017-09-15 - Burke Gilman - Conflict
 Diagram
 A.311.13 Claudia Hirschey - Appendix 2 Conflict Diagrams_Two-way trail
 conflict at intersection (1)
 A.311.14 Claudia Hirschey - Appendix 2 Conflict Diagrams_Two-way trail
 conflict at intersection
 A.311.15 Claudia Hirschey - 2016_Safe_Streets_Boulder_Report_FINAL-1-
 201605241239
 A.311.16 Burke-Gilman Trail Missing Link Safety Analysis_Tech Memo_Nov
 2017 w attachments
 A.311.17 9_SDOT ROWIM_Chapter4DesignCriteria
 A.311.18 8_WSDOT Design Manual Ch. 15_Shared Use Paths
 A.311.19 7_MassDOT Separated Bike Lane Planning & Design Guide_Chapter 4
 A.311.20 6_Vancouver_design-guidelines-for-all-ages-and-abilities-cycling-
 routes

⁸ Prepared by Barry Knight for V. Bishop and produced to the Respondents.

⁹ Prepared by Barry Knight for V. Bishop and produced to the Respondents.

¹⁰ Prepared by Barry Knight for V. Bishop and produced to the Respondents.

- 1 A.311.21 5_Two-Way Cycle Tracks - National Association of City
 Transportation Officials
 2 A.311.22 4_2016_Safe_Streets_Boulder_Report
 3 A.311.23 1_NCHRP Guide to Bicycle Safety Counter Measures
 4 A.311.24 11_SDOT Streets Illustrated Protected Bike Lanes
 5 A.311.25 10_WSDOT Local Agency Guidelines
 6 A-311.26 20170926_055-000000164¹¹
 7 A-311.26 20170926_055-000000310¹²
 8 A-312.1—A-312.xx Copies of documents and materials from S. Cohen’s file produced to
 the City and CBC, such as exhibits, diagrams charts, tables, data-compilations and video
 9 animations prepared by S. Cohen, including, without limit the following:
 10 A-312.1 S. Cohen’s Resume
 11 A-312.2 Washington State Maritime Sector Economic Impact Study, 2017 Update
 12 A-312.3 Washington State Maritime Sector Economic Impact Study, 2013
 13 A-312.4 PRSC 2015 Industrial Lands Study
 14 A-312.5-XX Notes, documents and exhibits from S. Cohen deposition to be
 taken by the City
 15 A-313.1-313.5 Copies of documents and materials from S. Kuznicki’s file produced to
 the City and CBC, such as exhibits, diagrams charts, tables, data-compilations and video
 16 animations prepared by S. Kuznicki, including, without limit the following:
 17 A.313.1 SKSUPP000001
 18 A.313.2 SKSUPP000002
 19 A.313.3 SKSUPP000003
 20 A.313.4 SKSUPP000004
 21 A.313.5 SKSUPP000005
 22 A-314 V. Bishop’s resume¹³
 23 A-315 C. Hirschey’s resume
 24 A-316 B. Knight’s resume
 25 A-317 S. Kuznicki’s resume
 A-318 Timeline for Missing Link Project from SDOT website (8.31.2017)
 A-319 Aerial Image of NW Market Street & 26th Avenue (2017)
 A-320 WSDOT Design Manual Chapter 1515—Pedestrian and Bicycle Facilities (2012)
 A-320.1 WSDOT Design Manual Chapter 1520—Roadway Bicycle Facilities (2015)
 A-321 AASHTO Guide for the Development of Bicycle Facilities (4th Ed., 2012)
 A-322 NACTO Urban Bikeway Design Guide (current version)¹⁴
 A-323 Excerpts from SDOT Right-of-Way Improvement Manual (2012)
 A-323.1 2017 City of Seattle Standard Plans for Municipal Construction.
 A-323-2. Section 1.2 Citywide Policy Guidance for Right-of-Way Improvements
 (2017)
 A-324 Excerpts from the SDOT Right-of-Way Improvement Manual (2017)
 A-325.1-325.8 Photographs and/or video taken or prepared at the direction of S.
 Anderson
 A-325.1 Large Truck exiting driveway
 A-325.2 Large Truck entering driveway

¹¹ Document has been previously produced to the City and Cascade and will not be produced again.

¹² *Id.*

¹³ All resumes were previously produced and will not be produced again.

¹⁴ Publicly available document in the City’s possession.

- 1 A-325.3 Large Truck parked near railroad tracks
 2 A-325.4 Large Truck entering driveway
 3 A-325.5 Large Truck Reversing out of driveway
 4 A-325.6 Large Truck Reversing out of driveway, crossing railroad tracks
 5 A-325.7 Large Truck blocking railroad tracks
 6 A-325.8 See link:
 7 <https://www.youtube.com/watch?v=I7nRhOeOJNg&feature=youtu.be>
 8 A-326 Associated Press, “Bicyclist dies after collision with cement truck in Kenmore”
 9 (2015)
 10 A-327 Forester (2012), Effective Cycling (7th Ed.), Chapter 47
 11 A-328.1-328.xx Photographs and/or video taken or prepared at the direction of M.
 12 Garrity
 13 A-329.1-329.xx Photographs and/or video taken or prepared at the direction of T. Olstad
 14 A-330.1-330.xx Photographs and/or video taken or prepared at the direction of B.
 15 Herzberg
 16 A-332 FEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (May 2017) and all
 17 drafts, comments thereto, and correspondence related thereto¹⁵
 18 A-333.1-333.3 FEIS, Volume 2 (May 2017)
 19 A-333.1 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part A (May
 20 2017) and all drafts, comments thereto, and correspondence related thereto¹⁶
 21 A-333.2 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part B (May
 22 2017) and all drafts, comments thereto, and correspondence related thereto¹⁷
 23 A-333.3 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part C (May
 24 2017) and all drafts, comments thereto, and correspondence related thereto¹⁸
 25 A-334.1-334.3 FEIS, Volume 3 (May 2017)
 A-334.1 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part A (May
 2017) and all drafts, comments thereto, and correspondence related thereto¹⁹
 A-334.2 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part B (May
 2017) and all drafts, comments thereto, and correspondence related thereto
 A-334.3 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part C (May
 2017) and all drafts, comments thereto, and correspondence related thereto
 A-335 FEIS, Burke-Gilman Trail Missing Link Project, Executive Summary (May 2017)
 and all drafts, comments thereto, and correspondence related thereto
 A-336.1-336.6 DEIS (June 2016)
 A-336.1 DEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (June 2016)
 and all drafts, comments thereto, and correspondence related thereto
 A-336.2 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix A
 (May 2016) and all drafts, comments thereto, and correspondence related thereto
 A-336.3 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix B
 (May 2016) and all drafts, comments thereto, and correspondence related thereto
 A-336.4 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix C
 (May 2016) and all drafts, comments thereto, and correspondence related thereto

¹⁵ Known to be possessed by Respondents.

¹⁶ Known to be possessed by Respondents.

¹⁷ Known to be possessed by Respondents.

¹⁸ Known to be possessed by Respondents.

¹⁹ Known to be possessed by Respondents, including documents listed below to A-349.xx.

1 A-336.5 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix D
2 (May 2016) and all drafts, comments thereto, and correspondence related thereto
3 A-336.6 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix E
4 (May 2016) and all drafts, comments thereto, and correspondence related thereto
5 A-337 DEIS, Burke-Gilman Trail Missing Link Project, Executive Summary (May 2016)
6 and all drafts, comments thereto, and correspondence related thereto
7 A-338 Transcript from the previous hearing W-08-007
8 A-339 Transcript from the previous hearing W-11-002
9 A-340 Transcript from the previous hearing W-12-002
10 A-341.1-341.xxxxx Responses and documents produced by the City, in response to the
11 Coalition's First Set of Interrogatories and Requests for Production served on the City on
12 June 30, 2017, and received by the Coalition on the following dates:

13 July 31, 2017;
14 August 4, 2017;
15 August 10, 2017;
16 August 11, 2017;
17 August 16, 2017;
18 August 17, 2017;
19 August 23, 2017;
20 August 31, 2017; and

21 Any future production by the City, including, without limitation, the following:

22 A-341.1 SEA007303
23 A-341.2 SEA007449
24 A-341.3 SEA007603
25 A-341.4 SEA009863
A-341.5 SEA010415
A-341.6 SEA011403
A-341.7 SEA011951
A-341.8 SEA014006
A-341.9 SEA014038
A-341.10 SEA014041
A-341.11 SEA014120
A-341.12 SEA014132
A-341.13 SEA017645
A-341.14 SEA018161
A-341.15 SEA018391
A-341.16 SEA018533
A-341.17 SEA020059
A-341.18 SEA000063
A-341.19 SEA000087
A-341.20 SEA001999
A-341.21 SEA005045
A-341.22 SEA006843

26 A-342.1-342.xxxx Responses and documents produced by Cascade, in response to the
27 Coalition's First Set of Interrogatories and Requests for Production served on Cascade on
28 July 11, 2017, and received by the Coalition on the following dates:

29 August 10, 2017;
30 August 21, 2017; and

31 Any future production by Cascade, including, without limitation, the following:

32 A-342.1 CBC 0000292

1 A-342.2 CBC 0000363
A-342.3 CBC 0000506
2 A-342.4 CBC 0000507
A-342.5 CBC 0000518
3 A-342.6 CBC 0000535
A-342.7 CBC 0000688
4 A-342.8 CBC 0000721
A-342.9 CBC 0000737
5 A-342.10 CBC 0000836
A-342.11 CBC 0000845
6 A-342.12 CBC 0000871
A-342.13 CBC_0000871
7 A-342.14 CBC_0003094
A-342.15 CBC_0005090
8 A-342.16 CBC 0000442
A-342.17 CBC 0000272

9 A-343.1-343.xxxx Public records produced in installments by the Seattle Department
of Transportation in response to the following public records requests:

10 C010871-031017, submitted by Veris on March 10, 2017;
C012770-042617, submitted by Veris on April 26, 2017;
11 C014637-061917, submitted by Veris on June 19, 2017;
C014934-062617, submitted by Veris on June 26, 2017;
12 C015169-070317, submitted by Veris on July 3, 2017;
C015396-071017, submitted by Veris on July 10, 2017;
13 C015665-071817, submitted by Veris on July 18, 2017;
C0115866-072417, submitted by Veris on July 24, 2017;
14 C016066-072717, submitted by Veris on July 27, 2017;
C016144-073117, submitted by Veris on July 31, 2017;
15 C016512-080817, submitted by Veris on August 8, 2017;
C016765-081517, submitted by Veris on August 15, 2017;
16 C017015-082117, submitted by Veris on August 21, 2017;
C017287-082817, submitted by Veris on August 28, 2017;
17 C017747-091117, submitted by Veris on September 11, 2017;
C018053-091917, submitted by Veris on September 19, 2017;
18 C018324-092617, submitted by Veris on September 26, 2017;
C018570-100317, submitted by Veris on October 3, 2017;
19 C019027-101217, submitted by CBO PRR Officer on Veris' behalf on October 12, 2017;
C019181-101717, submitted by Veris on October 17, 2017;
20 C019567-102617, submitted by Veris on October 26, 2017;
C019960-110617, submitted by Veris on November 6, 2017;
21 C019962-110617, submitted by Veris on November 6, 2017; and

22 Any additional installments of public records produced by the Seattle Department of
Transportation

23 A-343.1 SDOT-PR001036
A-343.2 SDOT-PR001063
24 A-343.3 SDOT-PR007362
A-343.4 SDOT-PR015541
25 A-343.5 SDOT-PR028640
A-343.6 SDOT-PR029586
A-343.7 SDOT-PR029753

1 A-343.8 SDOT-PR029755
2 A-343.9 20170914_080-000000046
3 A-343.10 SDOT-PR000573
4 A-343.11 SDOT-PR000670

5 A-344.1-344.xxxx Public records produced in installments by the Office of Economic
6 Development in response to the following public records requests:
7 C011006-031517, submitted by Veris on March 10, 2017, and
8 C012768-042617, submitted by Veris on April 26, 2017.

9 A-345.1-345.xxxx Public records produced in installments by the Office of the Mayor
10 in response to the following public records requests:
11 C010966-031417, submitted by Veris on March 10, 2017;
12 C012769-042617, submitted by Veris on April 26, 2017; and
13 C014520-61417, submitted by Veris per the instructions of a Public Records Request
14 Officer, on June 14, 2017.

15 A-346.1-346.xxxx Public records produced in installments by the Office of
16 Councilmember Mike O'Brien in response to the following public records requests:
17 C010899-031317, submitted by Veris on March 10, 2017, and
18 C013286-051017, submitted by Veris on April 26, 2017.

19 A-347.1-347.xxxx Public records produced in installments by the Seattle City Budget
20 Office in response to the following public records requests:
21 C012822-042817, submitted by Veris on April 26, 2017
22 C018713-100517, submitted by Veris on October 5, including, without limitation, the
23 following:

24 A-347.1 CBO-PR017791

25 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:

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;
C017286-082817, submitted by Veris on August 28, 2017;
C017746-091117, submitted by Veris on September 11, 2017;
C018052-091917, submitted by Veris on September 19, 2017;
C018323-092617, submitted by Veris on September 26, 2017;
C018569-100317, submitted by Veris on October 3, 2017;
C019180-101717, submitted by Veris on October 17, 2017;
C019566-102617, submitted by Veris on October 26, 2017;
C019959-110617, submitted by Veris on November 6, 2017;
C019961-110617, submitted by Veris on November 6, 2017; and

Any additional installments of public records produced by the Seattle Department of
Constructions & Inspections.

A-349.1-349.xxxx Copies of documents produced to either the City or Cascade, in
response to either the City or Cascade's first set of discovery to the Coalition, including,
without limitation, the following:

- 1 A-349.1 BC000612²⁰
2 A-349.2 BC001149
3 A-350.1-350.93 Copies of documents used as exhibits during depositions of the
4 following deponents:
5 A-350.1-350.20 Erinn Walter Ellig
6 350.1 Deposition Exhibit 1: FEIS Chapter 7, page 7-1 (May 2017)
7 350.2 Deposition Exhibit 2: FEIS Chapter 7, page 7-2 (May 2017)
8 350.3 Deposition Exhibit 3: FEIS Chapter 7, Figure 7-1 (May 2017)
9 350.4 Deposition Exhibit 4: Driveway Spreadsheet for Proposed Driveway
10 Count
11 350.5 Deposition Exhibit 5: FEIS Chapter 7, pages 7-11 – 7-12 (May
12 2017)
13 350.6 Deposition Exhibit 6: FEIS Chapter 7, page 7-22 (May 2017)
14 350.7 Deposition Exhibit 7: FEIS Chapter 7, page 7-37 (May 2017)
15 350.8 Deposition Exhibit 8: FEIS Chapter 7, page 7-30 (May 2017)
16 350.9 Deposition Exhibit 9: FEIS Chapter 7, page 7-31 – 7-32 (May 2017)
17 350.10 Deposition Exhibit 10: Draft Transportation Discipline Report
18 (“Draft TDR”) SDOT Comment Matrix (undated)
19 350.11 Deposition Exhibit 11: Draft TDR (December 2015)
20 350.12 Deposition Exhibit 12: Final Transportation Discipline Report
21 (“Final TDR”), Chapter 3, page 3-7 (April 2017)
22 350.13 Deposition Exhibit 13: FEIS, Chapter 7, page 7-33 (May 2017)
23 350.14 Deposition Exhibit 14: FEIS, Chapter 7, page 7-35 (May 2017)
24 350.15 Deposition Exhibit 15: FEIS, Chapter 7, page 7-41 (May 2017)
25 350.16 Deposition Exhibit 16: TDR, page ES-2 (April 2017)
350.17 Deposition Exhibit 17: TDR, page 4-22 (April 2017)
350.18 Deposition Exhibit 18: TDR, page 3-2 (April 2017)
350.19 Deposition Exhibit 19: TDR, page 5-17 (April 2017)
350.20 Deposition Exhibit 20: Final Economics Consideration Report
 (“Final ECR”), page ES-2 (May 2016)
A-350.21-350.27 Victor Bishop
350.21 Deposition Exhibit 1: SK000246, Driveway Turning Movements
 (September 2017)
350.22 Deposition Exhibit 2: VB000169, Email from Scott Kuznicki to
 Vic Bishop, dated August 13, 2017
350.23 Deposition Exhibit 3: VB000654-VB0-00657, Email exchange
 from Danielle Granatt to Vic Bishop, dated August 31, 2017
350.24 Deposition Exhibit 4: VB001672-VB001676
350.25 Deposition Exhibit 5: Sidepath Rating System Document
350.26 Deposition Exhibit 6: VB000266 with attachments
350.27 Deposition Exhibit 7: VB001692-VB001695
A-350.28-A-350.35 Claudia Hirschey
350.28 Deposition Exhibit 1: CH002262-CH002281
350.29 Deposition Exhibit 2: CH000891-CH000893
350.30 Deposition Exhibit 3: CH002253-CH002253 with attachments
350.31 Deposition Exhibit 4: CH000207
350.32 Deposition Exhibit 5: CH000759-CH000770

²⁰ These documents were produced previously during Discovery and will not be produced again.

- 1 350.33 Deposition Exhibit 6: CH000544-CH000545
2 350.34 Deposition Exhibit 7: CH002311-CH002312
3 350.35 Deposition Exhibit 8: Photographs
4 A-350.36-A-350.46 Jennifer Hagenow
5 350.36 Deposition Exhibit 1: FEIS, List of Preparers, page 13-1 (May
6 2017)
7 350.37 Deposition Exhibit 2: FEIS, Chapter 4, page 4-1 (May 2017)
8 350.38 Deposition Exhibit 3: DEIS, Chapter 4, page 4-12 – 4-27 (June
9 2016)
10 350.39 Deposition Exhibit 4: DEIS, Chapter 4 (June 2016)
11 350.40 Deposition Exhibit 5: Seattle 2035 Conference Plan, Crown Hill
12 Residential Urban Village (August 2015)
13 350.41 Deposition Exhibit 6: FEIS, Chapter 4 (May 2017) *ERROR ON
14 PDF
15 350.42 Deposition Exhibit 7: Email from J. Hagenow to Peter Carr, Lisa
16 Adolfson, Mark Johnson, and Claire Hoffman, dated June 3, 2016
17 350.43 Deposition Exhibit 8: SDOT Comment Matrix, Land Use Disciple
18 Report (“LUDR”) (undated)
19 350.44 Deposition Exhibit 9: Version 3 Redline Draft, DEIS, Chapter 4
20 (June 2016)
21 350.45 Deposition Exhibit 10: LUDR, Appendix A, Table A-1 (May
22 2016)
23 350.46 Deposition Exhibit 11: FEIS, Chapter 4, page 4-2 (May 2017)
24 A-350.47-A-350.54 Scott Kuznicki
25 350.47 Deposition Exhibit 1: SK000246-SK000281, Driveway Turning
Movements (September 2017)
350.48 Deposition Exhibit 2: VB000169, Email from Scott Kuznicki to
Vic Bishop, dated August 8, 2013
350.49 Deposition Exhibit 3: VB000654-VB000657, Email exchange
between Vic Bishop, Bryce Kinney, and Scott Kuznicki, dated August 31,
2017
350.50 Deposition Exhibit 4: Transpo Group Turning Maneuver Diagram
(August 2017)
350.51 Deposition Exhibit 5: SK000294, Email exchange between Vic
Bishop, Bryce Kinney, and Scott Kuznicki, dated August 15, 2017
350.52 Deposition Exhibit 6: Transpo Group Shilshole Ave NW Cross-
Section (August 2017)
350.53 Deposition Exhibit 7: VB002463- VB002466, Email exchange
between Vic Bishop, Bryce Kinney, and Scott Kuznicki, dated September
15, 2017
350.54 Deposition Exhibit 8: Transpo Group Draft Blind Spot Diagram
(October 2017)
A-350.55 Blake Trask
350.55 Deposition Exhibit 1: Cascade’s Objections and Responses to
Petitioners’ First Set of Interrogatories and Requests for Production, dated
August 10, 2017
A-350.56-A-350.62 Claire Hoffman
350.56 Deposition Exhibit 1: FEIS, List of Preparers, page 13-1 (May
2017)

- 1 350.57 Deposition Exhibit 2: Email from Jennifer Hagenow to Peter Carr,
 et al., dated June 3, 2016
- 2 350.58 Deposition Exhibit 3: FEIS, Chapter 4 (May 2017)
- 3 350.59 Deposition Exhibit 4: Email exchange from Lisa Adolfson to Jeff
 Ferris, dated January 15, 2016
- 4 350.60 Deposition Exhibit 5: FEIS, LUDR Updates & Errata (May 2017)
- 5 350.61 Deposition Exhibit 6: SDOT Comments on FEIS Draft?
- 350.62 Deposition Exhibit 7: Draft Version, LUDR Updates & Errata,
 Appendix A
- A-350.63-A-350.69 Morgan Shook
- 6 350.63 Deposition Exhibit 1: Burke Gilman Trail SEPA EIS Scope of
 Work, dated July 3, 2014
- 7 350.64 Deposition Exhibit 2: Draft Economic Considerations Report
 (“Draft ECR”) (January 2016)
- 8 350.65 Deposition Exhibit 3: Draft ECR (January 2016)
- 350.66 Deposition Exhibit 4: Draft ECR (May 2016)
- 9 350.67 Deposition Exhibit 5: SDOT Comment Matrix, January 2016 Draft
 ECR
- 10 350.68 Deposition Exhibit 6: SDOT Comment Matrix, May 2016 Draft
 ECR
- 11 350.69 Deposition Exhibit 7: Email exchange from Jeff Ferris to Lisa
 Adolfson, dated March 2, 2016
- A-350.70-A-350.81 Mark Mazzola
- 13 350.70 Deposition Exhibit 1: Email exchange from Lisa Adolfson to Jeff
 Ferris, Morgan Shook, and Matthew Kitchen, dated January 15, 2016
- 14 350.71 Deposition Exhibit 2: SDOT Comments, May 2016 Draft ECR
- 350.72 Deposition Exhibit 3: SDOT Comments, January 2016 Draft ECR
- 15 350.73 Deposition Exhibit 4: Draft ECR (May 2016)
- 350.74 Deposition Exhibit 5: Burke Gilman Trail SEPA EIS Scope of
 Work, dated May 29, 2017
- 16 350.75 Deposition Exhibit 6: *Negotiating Ballard’s Missing Link of the
 Burke-Gilman Trail: How Bicycle Infrastructure Can Integrate a
 Sustainable Design Solution*, Michael Schwindeller (2013)
- 17 350.76 Deposition Exhibit 7: Email from Davidya Kasperzyk to John
 Perlic, dated March 16, 2015
- 18 350.77 Deposition Exhibit 8: FEIS, Draft LUDR Updates & Errata (May
 2017)
- 19 350.78 Deposition Exhibit 9: Email from Mark Mazzola to Scott Kubly, et
 al., dated February 10, 2017
- 20 350.79 Deposition Exhibit 10: Summary of Stakeholder Meetings with
 Ballard Businesses, dated March 7, 2017
- 21 350.80 Deposition Exhibit 11: Email from Scott Kubly to Kiersten Grove,
 dated February 25, 2017
- 22 350.81 Deposition Exhibit 12: Letter from Paul Nerdrum to Mayor E.
 Murray, dated March 3, 2017
- A-350.82-A-350.93 Mark Johnson;
- 24 350.82 Deposition Exhibit 1: FEIS Annotate Outline Draft (February
 2017)
- 25 350.83 Deposition Exhibit 2: Email exchange from Mark Mazzola to Erin
 Ferguson et al., dated May 2, 2017

1 350.84 Deposition Exhibit 3: FEIS, Chapter 7, pages 7-48 – 7-63 (May
2017)
2 350.85 Deposition Exhibit 4: Email exchange transmitting thesis:
3 *Negotiating Ballard’s Missing Link of the Burke-Gilman Trail: How*
4 *Bicycle Infrastructure Can Integrate a Sustainable Design Solution,*
5 Michael Schwindeller (2013)
6 350.86 Deposition Exhibit 5: Draft EDR (January 2017)
7 350.87 Deposition Exhibit 6: DEIS, Economic Considerations Report
8 (May 2016)
9 350.88 Deposition Exhibit 7: Email from Mark Johson to Fred Young et
10 al., dated May 16, 2014
11 350.89 Deposition Exhibit 8: Email exchange from Lisa Adolfson to Jeff
12 Ferris, Morgan Shook, and Matthew Kitchen, dated January 15, 2016
13 350.90 Deposition Exhibit 9: Email exchange from Lisa Adolfson to Mark
14 Mazzola, dated May 4, 2017
15 350.91 Deposition Exhibit 10: Email exchange from Claire Hoffman to
16 Mark Johnson and Lisa Adolfson, dated November 13, 2015
17 350.92 Deposition Exhibit 11: Redline Draft LUDR, pages 37-38 (May
18 2017)
19 350.93 Deposition Exhibit 12: Consulting Agreement between SDOT and
20 Environmental Science Associates (“ESA”)
21 A-350.xx-A-350.xx Documents relied upon by Bill Schultheiss and/or used at his
22 deposition to be taken, by agreement, on November 9, 2017

23 Any additional deponents called by SDOT, Cascade, or the Coalition and all exhibits
24 related thereto.

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

DATED this 6th day of November, 2017.

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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

FOSTER PEPPER PLLC

By /s/ Patrick J. Schneider
Patrick J. Schneider, WSBA #11957
Foster Pepper PLLC
1111 Third Avenue, Suite 3000
Seattle, Washington 98101-3292
Tel: (206) 447-4400
Fax: (206) 447-9700
pat.schneider@foster.com

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
alicia.reise@seattle.gov
*Attorney for Respondent
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

Matthew Cohen
Rachel H. Cox
Stoel Rives LLP
600 University Street, Suite 3600
Seattle, WA 98101-4109
Tel: (206) 386-7569
Fax: (206) 386-7500
matthew.cohen@stoel.com
rachel.cox@stoel.com
Attorney for Intervenor Cascade Bicycle Club

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

Tadas A. Kisielius
Dale Johnson
Clara Park
Van Ness Feldman
719 2nd Avenue, Suite 1150
Seattle, WA 98104
Tel: (206) 623-9372
tak@vnf.com
dnj@vnf.com
cpark@vnf.com
map@vnf.com
Attorney for Respondent City of Seattle

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

Dated at Seattle, Washington, this 6th day of November, 2017.

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