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7 BEFORE THE HEARING EXAMINER  
8 CITY OF SEATTLE

9 In the Matter of the Appeal of:

Hearing Examiner File

10 THE BALLARD COALITION

W-17-004

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

THE BALLARD COALITION'S REVISED  
FINAL DISCLOSURE OF EXHIBITS

15 The Ballard Coalition submits the following revised exhibit list:

16  
17 I. EXHIBITS

18 Previously admitted Exhibits in W-08-0071<sup>2</sup>

19 Previously listed but not admitted Exhibits in W-08-007, including:

20 A-1 Watchel, Risk Factors (1994)

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

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

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

24  
25 <sup>2</sup>Pursuant to the Order, copies of these exhibits will not be provided because the City of Seattle Department of 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-27 to A-34 Documents related to the Ballard Corridor Design Study, SDOT (2003)
- 2 Previously admitted Exhibits in W-11-002<sup>3</sup>
- 3 Previously listed but not admitted Exhibits in W-11-002, including:
- 4 A-78 Atelier, Burke-Gilman Trail Redevelopment Study (October 2005)
- 5 A-80 Allen, Bicycle Sidepaths: Crash Risks and Liability Exposure: Evidence from the  
Research Literature (2009)
- 6 A-81 Dr. Eero Pasanen, The Risks of Cycling
- 7 A-82 Wayne Pein, A Tale of Three Cities
- 8 A-83 Petritsch, Sidepath Safety Model: Bicycle Sidepath Design Factors Affecting Crash  
Rates (3/21/2006)
- 9 A-87 Dr. William Moritz, Adult Bicyclists in the U.S.
- 10 A-88 Dr. William Moritz, A Survey of North American Bicycle Commuters
- 11 A-89 Watchel and Lewiston, Risk Factors for Bicycle-Motor Vehicle Collisions at  
12 Intersections (September 1999)
- 13 A-90 USDOT Characteristic of Emerging Road and Trail Users and Their Safety (2004)
- 14 A-91 Franklin, Cycle Path Safety: A Summary of Research (2009)
- 15 Previously admitted Exhibits in W-12-002<sup>4</sup>
- 16 A-254.14 Table 4.1 Burke Gilman Trail Extension, Driveway Width, Barrier & Fence  
Hazards
- 17 A-254.15 Table 4.2 Burke Gilman Trail Extension, Driveway Width, Barrier & Fence  
18 Hazards
- 19 A-254.16 – 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 <sup>3</sup> Known to be possessed by SDOT and available to Cascade from its prior counsel or from SDOT pursuant to their  
25 Common Interest Agreement.

<sup>4</sup> Known to be possessed by SDOT and available to Cascade from its prior counsel or from SDOT pursuant to their  
Common Interest Agreement.

- 1 A-303 Landis, B. W. (2003), Intersection Level of Service for Bicycle Through Movement
- 2 A-305 Jackson, N (2002), Bike Land Design Guide. Chicago, Pedestrian and Bicycle  
3 Information Center
- 4 A-306 Pucher, J. (2001), Cycling Safety on Bikeways v. Roads.
- 5 A-307 Rasanen, M. (1998), Attention and Expectation Problems in Bicycle-Car Collisions: An  
6 In-Depth Study
- 7 A-309 Transpogroup, Memorandum, 5/16/2005, Burke-Gilman Trail Crossing Plan
- 8 A-310.1 Victor Bishop - CTS Final Report<sup>5</sup>
- 9 A-310.2 Victor Bishop - Sidepath Score Chart
- 10 A-310.3 Victor Bishop - Sidepath Rating System, 10-30-2017
- 11 A-310.4 Victor Bishop - Sidepath - The Results of the Rating System
- 12 A-310.5 Victor Bishop - 2017-08-14 - Burke Gilman - 24th Ave NW to 22nd Ave NW
- 13 A-310.6 Victor Bishop - Parking Evaluation, BGT FEIS
- 14 A-310.7 Victor Bishop - Ballard Mill Marina Count Hourly data, 2017
- 15 A-310.8 Victor Bishop - CTS ELEVATED SECTION for Bike Bridge<sup>6</sup>
- 16 A-310.9 Victor Bishop - CTS Plan Sheets of Bike Bridge<sup>7</sup>
- 17 A-310.10 Victor Bishop - Ballard Mill Marina 9.ASF
- 18 A-310.11 VBSUPP000002 Video<sup>8</sup>
- 19 A-310.12 VBSUPP000013 Video<sup>9</sup>
- 20 A-310.13 VBSUPP000022 Video<sup>10</sup>
- 21 A-310.14 VBSUPP000024 Video<sup>11</sup>
- 22 A-310.15 VBSUPP000025 Video<sup>12</sup>

23 <sup>5</sup> Prepared by Barry Knight for V. Bishop and produced to the Respondents.

24 <sup>6</sup> Prepared by Barry Knight for V. Bishop and produced to the Respondents.

25 <sup>7</sup> Prepared by Barry Knight for V. Bishop and produced to the Respondents.

<sup>8</sup> Inadvertently left off previous November 6 exhibit list, but produced with other exhibits on November 6, 2017.

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

- 1 A-310.16 VBSUPP000026 Video <sup>13</sup>
- 2 A-310.17 SK000206 Percentage of Roadway Crossings, Driveways, and Incursion Zones Table
- 3 (9/15/2017)<sup>14</sup>
- 4 A-310.18 SK000205 Shilshole Ave NW – 24<sup>th</sup> Ave NW to 22<sup>nd</sup> Ave NW<sup>15</sup>
- 5 A-310.19 Intersection – NW Market St and 24<sup>th</sup> Ave NW<sup>16</sup>
- 6 A-310.20 Intersection – NW Market St and 24<sup>th</sup> Ave NW<sup>17</sup>
- 7 A-310.21 Revised AutoTURN Figures<sup>18</sup>
- 8 A.311.1 Claudia Hirschey – Vision Zero Plan
- 9 A.311.2 Claudia Hirschey - Vancouver\_design-guidelines-for-all-ages-and-abilities-cycling-
- 10 routes
- 11 A.311.3 Claudia Hirschey - Vancouver email\_ Bicycle Safety - bicycle facility crossing of active
- 12 industrial driveways
- 13 A.311.4 Claudia Hirschey - SBMP\_21March\_FINAL\_full doc
- 14 A.311.5 Claudia Hirschey - NCHRP Guide to Bicycle Safety Counter Measures 13897
- 15 A.311.6 Claudia Hirschey - MassDOT\_Bicycle\_Chapter4\_Intersections
- 16 A.311.7 Claudia Hirschey - Be Friends Truck and Bicycle conflicts UW Urban Design Paper
- 17 A.311.8 Claudia Hirschey - Appendix 4\_Sidepath Rating System, 10-12-2017
- 18 A.311.9 Claudia Hirschey - Appendix 3\_http\_\_\_commuteorlando (2)
- 19 A.311.10 Claudia Hirschey - Appendix 3\_http\_\_\_commuteorlando
- 20 A.311.11 Claudia Hirschey - Appendix 2\_2017-09-15 - Burke Gilman - Conflict Diagram (1)

21 <sup>12</sup> *Id.*

22 <sup>13</sup> *Id.*

23 <sup>14</sup> Produced to the City and Cascade during discovery, but inadvertently left off previous November 6 exhibit list.

24 <sup>15</sup> Produced to the City and Cascade during discovery, but inadvertently left off previous November 6 exhibit list.

25 <sup>16</sup> Produced to the City and Cascade during discovery, but inadvertently left off previous November 6 exhibit list.

<sup>17</sup> Produced to the City and Cascade during discovery, but inadvertently left off previous November 6 exhibit list.

<sup>18</sup> These documents were produced to the City and Cascade during discovery and again as part of the exhibit production with the Coalition’s Final Witness and Exhibit List on November 6, 2017. The Coalition has since corrected minor errors and produced higher quality versions of the figures. We are identifying them here as a separate exhibit for efficiency during the hearing.

- 1 A.311.12 Claudia Hirschey - Appendix 2\_2017-09-15 - Burke Gilman - Conflict Diagram
- 2 A.311.13 Claudia Hirschey - Appendix 2 Conflict Diagrams Two-way trail conflict at  
3 intersection (1)
- 4 A.311.14 Claudia Hirschey - Appendix 2 Conflict Diagrams Two-way trail conflict at  
5 intersection
- 6 A.311.15 Claudia Hirschey - 2016\_Safe\_Streets\_Boulder\_Report\_FINAL-1-201605241239
- 7 A.311.16 Burke-Gilman Trail Missing Link Safety Analysis Tech Memo Nov 2017 w  
8 attachments
- 9 A.311.17 9 SDOT ROWIM\_Chapter4DesignCriteria
- 10 A.311.18 8 WSDOT Design Manual Ch. 15\_Shared Use Paths
- 11 A.311.19 7 MassDOT Separated Bike Lane Planning & Design Guide\_ Chapter 4
- 12 A.311.20 6 Vancouver\_design-guidelines-for-all-ages-and-abilities-cycling-routes
- 13 A.311.21 5 Two-Way Cycle Tracks - National Association of City Transportation Officials
- 14 A.311.22 4 2016\_Safe\_Streets\_Boulder\_Report
- 15 A.311.23 1 NCHRP Guide to Bicycle Safety Counter Measures
- 16 A.311.24 11 SDOT Streets Illustrated Protected Bike Lanes
- 17 A.311.25 10 WSDOT Local Agency Guidelines
- 18 A-311.26 20170926\_055-000000164 Email Exchange bw C. Hirschey & J. Macik (11.4.16)
- 19 A-311.27 20170926\_055-000000310 Missing Link Meeting Notes from 2.10.17
- 20 A-312.1 S. Cohen's Resume
- 21 A-312.2 Washington State Maritime Sector Economic Impact Study, 2017 Update
- 22 A-312.3 Washington State Maritime Sector Economic Impact Study, 2013
- 23 A-312.4 PRSC 2015 Industrial Lands Study
- 24 A-312.5 Notes, documents and exhibits from S. Cohen deposition
- 25 A.313.1 SKSUPP000001 Blind Spot Diagram Demonstrating Sight Distance Hazards (10.5.17)
- A.313.2 SKSUPP000002 Video
- A.313.3 SKSUPP000003 Video

- 1 A.313.4 SKSUPP000004 Video  
2 A.313.5 SKSUPP000005 Video  
3 A-314 V. Bishop's resume  
4 A-315 C. Hirschey's resume  
5 A-316 B. Knight's resume  
6 A-317 S. Kuznicki's resume  
7 A-318 Timeline for Missing Link Project from SDOT website (8.31.2017)  
8 A-319 Aerial Image of NW Market Street & 26th Avenue (2017)  
9 A-320 WSDOT Design Manual Chapter 1515—Pedestrian and Bicycle Facilities (2012)  
10 A-320.1 WSDOT Design Manual Chapter 1520—Roadway Bicycle Facilities (2015)  
11 A-321 AASHTO Guide for the Development of Bicycle Facilities (4th Ed., 2012)  
12 A-322 NACTO Urban Bikeway Design Guide (current version)<sup>19</sup>  
13 A-323 Excerpts from SDOT Right-of-Way Improvement Manual (2012)  
14 A-323.1 2017 City of Seattle Standard Plans for Municipal Construction.  
15 A-323-2. Section 1.2 Citywide Policy Guidance for Right-of-Way Improvements (2017)  
16 A-324 Excerpts from the SDOT Right-of-Way Improvement Manual (2017)  
17 A-325.1 Large Truck exiting driveway  
18 A-325.2 Large Truck entering driveway  
19 A-325.3 Large Truck parked near railroad tracks  
20 A-325.4 Large Truck entering driveway  
21 A-325.5 Large Truck Reversing out of driveway  
22 A-325.6 Large Truck Reversing out of driveway, crossing railroad tracks  
23 A-325.7 Large Truck blocking railroad tracks  
24 A-325.8 The Missing Link Video<sup>20</sup>  
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<sup>19</sup> Publicly available document in the City's possession.

- 1 A-326 Associated Press, “Bicyclist dies after collision with cement truck in Kenmore” (2015)
- 2 A-327 Forester (2012), Effective Cycling (7<sup>th</sup> Ed.), Chapter 47
- 3 A-332 FEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (May 2017)
- 4 A-333.1-333.3 FEIS, Volume 2 (May 2017)
- 5 A-333.1 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part A (May 2017)
- 6 A-333.2 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part B (May 2017)
- 7 A-333.3 FEIS, Burke-Gilman Trail Missing Link Project, Volume 2, Part C (May 2017)
- 8 A-334.1 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part A (May 2017)
- 9 A-334.2 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part B (May 2017)
- 10 A-334.3 FEIS, Burke-Gilman Trail Missing Link Project, Volume 3, Part C (May 2017)
- 11 A-335 FEIS, Burke-Gilman Trail Missing Link Project, Executive Summary (May 2017)
- 12 A-336.1 DEIS, Burke-Gilman Trail Missing Link Project, Volume 1 (June 2016)
- 13 A-336.2 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix A (May 2016)
- 14 A-336.3 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix B (May 2016)
- 15 A-336.4 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix C (May 2016)
- 16 A-336.5 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix D (May 2016)
- 17 A-336.6 DEIS, Burke-Gilman Trail Missing Link Project, Technical Appendix E (May 2016)
- 18 A-337 DEIS, Burke-Gilman Trail Missing Link Project, Executive Summary (May 2016)
- 19 A-338 Transcript from the previous hearing W-08-007
- 20 A-339 Transcript from the previous hearing W-11-002
- 21 A-340 Transcript from the previous hearing W-12-002
- 22 A-341.1 SEA007303
- 23 A-341.2 SEA007449
- 24

25 <sup>20</sup> Video previously provided to the City and Cascade via link. Provided as MOV file alongside this revised exhibit list.

- 1 A-341.3 SEA007603<sup>21</sup>  
2 A-341.4 SEA009863  
3 A-341.5 SEA010415  
4 A-341.6 SEA011403  
5 A-341.7 SEA011951  
6 A-341.8 SEA014006  
7 A-341.9 SEA014038  
8 A-341.10 SEA014041  
9 A-341.11 SEA014120  
10 A-341.12 SEA014132  
11 A-341.13 SEA017645  
12 A-341.14 SEA018161  
13 A-341.15 SEA018391  
14 A-341.16 SEA018533  
15 A-341.17 SEA020059  
16 A-341.18 SEA000063  
17 A-341.19 SEA000087  
18 A-341.20 SEA001999  
19 A-341.21 SEA005045<sup>22</sup>  
20 A-341.22 SEA006843  
21 A-341.23 SEA003832<sup>23</sup>  
22 A-342.1 CBC 0000292  
23 A-342.2 CBC 0000363  
24

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25 <sup>21</sup> Identified on previous exhibit list, but inadvertently not produced on November 6, 2017.

<sup>22</sup> *Id.*

<sup>23</sup> Newly identified document from the City's discovery production.



- 1 A-342.3 CBC 0000506
- 2 A-342.4 CBC 0000507
- 3 A-342.5 CBC 0000518
- 4 A-342.6 CBC 0000535
- 5 A-342.7 CBC 0000688
- 6 A-342.8 CBC 0000721
- 7 A-342.9 CBC 0000737
- 8 A-342.10 CBC 0000836
- 9 A-342.11 CBC 0000845
- 10 A-342.12 CBC 0000871
- 11 A-342.13 CBC\_0000871
- 12 A-342.14 CBC\_0003094
- 13 A-342.15 CBC\_0005090
- 14 A-342.16 CBC 0000442
- 15 A-342.17 CBC 0000272
- 16 A-343.1 SDOT-PR001036
- 17 A-343.2 SDOT-PR001063
- 18 A-343.3 SDOT-PR007362
- 19 A-343.4 SDOT-PR015541
- 20 A-343.5 SDOT-PR028640
- 21 A-343.6SDOT-PR029586
- 22 A-343.7 SDOT-PR029753
- 23 A-343.8 SDOT-PR029755
- 24 A-343.9 20170914\_080-000000046
- 25 A-343.10 SDOT-PR000573

- 1 A-343.11 SDOT-PR000670
- 2 A-344.1-344.xxxx Public records produced in installments by the Office of Economic  
3 Development in response to the following public records requests: C011006-  
4 031517, submitted by Veris on March 10, 2017, and C012768-042617,  
5 submitted by Veris on April 26, 2017.
- 6 A-345.1-345.xxxx Public records produced in installments by the Office of the Mayor in  
7 response to the following public records requests: C010966-031417,  
8 submitted by Veris on March 10, 2017; C012769-042617, submitted by Veris  
9 on April 26, 2017; and C014520-61417, submitted by Veris per the  
10 instructions of a Public Records Request Officer, on June 14, 2017.
- 11 A-346.1-346.xxxx Public records produced in installments by the Office of Councilmember  
12 Mike O'Brien in response to the following public records requests:  
13 C010899-031317, submitted by Veris on March 10, 2017, and C013286-  
14 051017, submitted by Veris on April 26, 2017.
- 15 A-347.1-347.xxxx Public records produced in installments by the Seattle City Budget Office in  
16 response to the following public records requests: C012822-042817,  
17 submitted by Veris on April 26, 2017 and C018713-100517, submitted by  
18 Veris on October 5, including, without limitation, the following:  
19 A-347.1 CBO-PR017791
- 20 A-348.1-348.xxxx Public records produced in installments by the Seattle Department of  
21 Construction & Inspections in response to the following public records  
22 requests: C014636-061917, submitted by Veris on June 19, 2017; C014933-  
23 062617, submitted by Veris on June 26, 2017; C015168-070317, submitted  
24 by Veris on July 3, 2017; C015395-071017, submitted by Veris on July 10,  
25 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:  
A-349.1 BC000612  
A-349.2 BC001149

- 1 A-350.1-350.93 Copies of documents used as exhibits during depositions of the following  
2 deponents:  
3 A-350.1-350.20 Erinn Walter Ellig  
4 350.1 Deposition Exhibit 1: FEIS Chapter 7, page 7-1 (May 2017)  
5 350.2 Deposition Exhibit 2: FEIS Chapter 7, page 7-2 (May 2017)  
6 350.3 Deposition Exhibit 3: FEIS Chapter 7, Figure 7-1 (May 2017)  
7 350.4 Deposition Exhibit 4: Driveway Spreadsheet for Proposed Driveway Count  
8 350.5 Deposition Exhibit 5: FEIS Chapter 7, pages 7-11 – 7-12 (May 2017)  
9 350.6 Deposition Exhibit 6: FEIS Chapter 7, page 7-22 (May 2017)  
10 350.7 Deposition Exhibit 7: FEIS Chapter 7, page 7-37 (May 2017)  
11 350.8 Deposition Exhibit 8: FEIS Chapter 7, page 7-30 (May 2017)  
12 350.9 Deposition Exhibit 9: FEIS Chapter 7, page 7-31 – 7-32 (May 2017)  
13 350.10 Deposition Exhibit 10: Draft Transportation Discipline Report (“Draft  
14 TDR”) SDOT Comment Matrix (undated)  
15 350.11 Deposition Exhibit 11: Draft TDR (December 2015)  
16 350.12 Deposition Exhibit 12: Final Transportation Discipline Report (“Final  
17 TDR”), Chapter 3, page 3-7 (April 2017)  
18 350.13 Deposition Exhibit 13: FEIS, Chapter 7, page 7-33 (May 2017)  
19 350.14 Deposition Exhibit 14: FEIS, Chapter 7, page 7-35 (May 2017)  
20 350.15 Deposition Exhibit 15: FEIS, Chapter 7, page 7-41 (May 2017)  
21 350.16 Deposition Exhibit 16: TDR, page ES-2 (April 2017)  
22 350.17 Deposition Exhibit 17: TDR, page 4-22 (April 2017)  
23 350.18 Deposition Exhibit 18: TDR, page 3-2 (April 2017)  
24 350.19 Deposition Exhibit 19: TDR, page 5-17 (April 2017)  
25 350.20 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)

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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

350.33 Deposition Exhibit 6: CH000544-CH000545

350.34 Deposition Exhibit 7: CH002311-CH002312

350.35 Deposition Exhibit 8: Photographs

A-350.36-A-350.46 Jennifer Hagenow

350.36 Deposition Exhibit 1: FEIS, List of Preparers, page 13-1 (May 2017)

350.37 Deposition Exhibit 2: FEIS, Chapter 4, page 4-1 (May 2017)

350.38 Deposition Exhibit 3: DEIS, Chapter 4, page 4-12 – 4-27 (June 2016)

350.39 Deposition Exhibit 4: DEIS, Chapter 4 (June 2016)

350.40 Deposition Exhibit 5: Seattle 2035 Conference Plan, Crown Hill Residential Urban Village (August 2015)

350.41 Deposition Exhibit 6: FEIS, Chapter 4 (May 2017) \*ERROR ON PDF

350.42 Deposition Exhibit 7: Email from J. Hagenow to Peter Carr, Lisa Adolfson, Mark Johnson, and Claire Hoffman, dated June 3, 2016

- 1           350.43 Deposition Exhibit 8: SDOT Comment Matrix, Land Use Discipline Report  
              ("LUDR") (undated)
- 2
- 3           350.44 Deposition Exhibit 9: Version 3 Redline Draft, DEIS, Chapter 4 (June  
              2016)
- 4           350.45 Deposition Exhibit 10: LUDR, Appendix A, Table A-1 (May 2016)
- 5           350.46 Deposition Exhibit 11: FEIS, Chapter 4, page 4-2 (May 2017)
- 6           A-350.47-A-350.54 Scott Kuznicki
- 7           350.47 Deposition Exhibit 1: SK000246-SK000281, Driveway Turning  
              Movements (September 2017)
- 8           350.48 Deposition Exhibit 2: VB000169, Email from Scott Kuznicki to Vic  
              Bishop, dated August 8, 2013
- 9
- 10          350.49 Deposition Exhibit 3: VB000654-VB000657, Email exchange between  
              Vic Bishop, Bryce Kinney, and Scott Kuznicki, dated August 31, 2017
- 11          350.50 Deposition Exhibit 4: Transpo Group Turning Maneuver Diagram (August  
              2017)
- 12          350.50 ENLARGED (copy of 350.50)
- 13
- 14          350.51 Deposition Exhibit 5: SK000294, Email exchange between Vic Bishop,  
              Bryce Kinney, and Scott Kuznicki, dated August 15, 2017
- 15          350.52 Deposition Exhibit 6: Transpo Group Shilshole Ave NW Cross-Section  
              (August 2017)
- 16
- 17          350.53 Deposition Exhibit 7: VB002463- VB002466, Email exchange between  
              Vic Bishop, Bryce Kinney, and Scott Kuznicki, dated September 15, 2017
- 18          350.54 Deposition Exhibit 8: Transpo Group Draft Blind Spot Diagram (October  
              2017)
- 19          A-350.55 Blake Trask
- 20          350.55 Deposition Exhibit 1: Cascade's Objections and Responses to Petitioners'  
              First Set of Interrogatories and Requests for Production, dated August 10,  
21                2017
- 22          A-350.56-A-350.62 Claire Hoffman
- 23          350.56 Deposition Exhibit 1: FEIS, List of Preparers, page 13-1 (May 2017)
- 24          350.57 Deposition Exhibit 2: Email from Jennifer Hagenow to Peter Carr, et al.,  
              dated June 3, 2016
- 25          350.58 Deposition Exhibit 3: FEIS, Chapter 4 (May 2017)

- 1 350.59 Deposition Exhibit 4: Email exchange from Lisa Adolfson to Jeff Ferris,  
2 dated January 15, 2016
- 3 350.60 Deposition Exhibit 5: FEIS, LUDR Updates & Errata (May 2017)
- 4 350.61 Deposition Exhibit 6: SDOT Comments on FEIS Draft
- 5 350.62 Deposition Exhibit 7: Draft Version, LUDR Updates & Errata, Appendix  
6 A
- 7 A-350.63-A-350.69 Morgan Shook  
8 350.63 Deposition Exhibit 1: Burke Gilman Trail SEPA EIS Scope of Work,  
9 dated July 3, 2014
- 10 350.64 Deposition Exhibit 2: Draft Economic Considerations Report (“Draft  
11 ECR”) (January 2016)
- 12 350.65 Deposition Exhibit 3: Draft ECR (January 2016)
- 13 350.66 Deposition Exhibit 4: Draft ECR (May 2016)
- 14 350.67 Deposition Exhibit 5: SDOT Comment Matrix, January 2016 Draft ECR
- 15 350.68 Deposition Exhibit 6: SDOT Comment Matrix, May 2016 Draft ECR
- 16 350.69 Deposition Exhibit 7: Email exchange from Jeff Ferris to Lisa Adolfson,  
17 dated March 2, 2016
- 18 A-350.70-A-350.81 Mark Mazzola  
19 350.70 Deposition Exhibit 1: Email exchange from Lisa Adolfson to Jeff Ferris,  
20 Morgan Shook, and Matthew Kitchen, dated January 15, 2016
- 21 350.71 Deposition Exhibit 2: SDOT Comments, May 2016 Draft ECR
- 22 350.72 Deposition Exhibit 3: SDOT Comments, January 2016 Draft ECR
- 23 350.73 Deposition Exhibit 4: Draft ECR (May 2016)
- 24 350.74 Deposition Exhibit 5: Burke Gilman Trail SEPA EIS Scope of Work,  
25 dated May 29, 2017
- 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)
- 350.76 Deposition Exhibit 7: Email from Davidya Kasperzyk to John Perlic,  
dated March 16, 2015
- 350.77 Deposition Exhibit 8: FEIS, Draft LUDR Updates & Errata (May 2017)

- 1 350.78 Deposition Exhibit 9: Email from Mark Mazzola to Scott Kubly, et al.,  
dated February 10, 2017
- 2
- 3 350.79 Deposition Exhibit 10: Summary of Stakeholder Meetings with Ballard  
Businesses, dated March 7, 2017
- 4
- 5 350.80 Deposition Exhibit 11: Email from Scott Kubly to Kiersten Grove, dated  
February 25, 2017
- 6
- 7 350.81 Deposition Exhibit 12: Letter from Paul Nerdrum to Mayor E. Murray,  
dated March 3, 2017
- 8 A-350.82-A-350.93 Mark Johnson;  
350.82 Deposition Exhibit 1: FEIS Annotate Outline Draft (February 2017)
- 9 350.83 Deposition Exhibit 2: Email exchange from Mark Mazzola to Erin  
Ferguson et al., dated May 2, 2017
- 10 350.84 Deposition Exhibit 3: FEIS, Chapter 7, pages 7-48 – 7-63 (May 2017)
- 11 350.85 Deposition Exhibit 4: Email exchange transmitting thesis: *Negotiating  
Ballard's Missing Link of the Burke-Gilman Trail: How Bicycle  
Infrastructure Can Integrate a Sustainable Design Solution*, Michael  
Schwindeller (2013)
- 12
- 13 350.86 Deposition Exhibit 5: Draft EDR (January 2017)
- 14
- 15 350.87 Deposition Exhibit 6: DEIS, Economic Considerations Report (May 2016)
- 16 350.88 Deposition Exhibit 7: Email from Mark Johson to Fred Young et al., dated  
May 16, 2014
- 17 350.89 Deposition Exhibit 8: Email exchange from Lisa Adolfson to Jeff Ferris,  
Morgan Shook, and Matthew Kitchen, dated January 15, 2016
- 18
- 19 350.90 Deposition Exhibit 9: Email exchange from Lisa Adolfson to Mark  
Mazzola, dated May 4, 2017
- 20 350.91 Deposition Exhibit 10: Email exchange from Claire Hoffman to Mark  
Johnson and Lisa Adolfson, dated November 13, 2015
- 21
- 22 350.92 Deposition Exhibit 11: Redline Draft LUDR, pages 37-38 (May 2017)<sup>24</sup>
- 23 350.93 Deposition Exhibit 12: Consulting Agreement between SDOT and  
Environmental Science Associates (“ESA”)
- 24 A-350.94-A-350.99 William Schultheiss
- 25

<sup>24</sup> A copy of the full source document of this excerpt is included behind this exhibit.

1 A-350.94 Deposition Exhibit 1: Email chain, top email, September 12, 2017, to  
2 Tadas Kisielius, Erin Ferguson from Bill Schultheiss

3 A-350.95 Deposition Exhibit 2: November 8, 2017, email to Josh Brower, and  
4 others, from Bill Schultheiss

5 A-350.96 Deposition Exhibit 3: July 20, 2016, Technical Memorandum by  
6 Claudia Hirschey, P.E.

7 A-350.97 Deposition Exhibit 4: October 3, 2017, email to Bill Schultheiss and  
8 tak@vnf.com from Erin Ferguson

9 A-350.98 Deposition Exhibit 5: June 20, 2017, Memorandum to Jenny Bailey  
10 from Bill Schultheiss

11 A-350.99 Deposition Exhibit 6: "Guide to Bicycle Facilities, 4th Edition 5.2.2,  
12 Shared Us Paths Adjacent to Roadways (Sidepaths)"

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

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

18 DATED this 21<sup>st</sup> day of November, 2017.

19 VERIS LAW GROUP PLLC

20 *By /s/ Joshua C. Brower*

21 Joshua C. Allen Brower, WSBA #25092

22 Leah B. Silverthorn, WSBA #51730

23 Danielle Granatt, WSBA #44182

24 Veris Law Group PLLC

25 1809 Seventh Avenue, Suite 1400

Seattle, WA 98101

Telephone: (206) 829-9590

Facsimile: (206) 829-9245

josh@verislawgroup.com

leah@verislawgroup.com

danielle@verislawgroup.com

*Attorneys for Appellant The Ballard Coalition*



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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

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

*Attorney for Respondent  
Seattle Department of Transportation*

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

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

*Attorney for Intervenor Cascade Bicycle Club*

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

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

*Attorney for Respondent City of Seattle*

Dated at Seattle, Washington, this 21<sup>st</sup> day of November, 2017.

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