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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

In the Matter of the Appeals of
**WALLINGFORD COMMUNITY
COUNCIL, ET AL.**
of adequacy of the FEIS issued by the
Director, Office of Planning and Community
Development.

Hearing Examiner File:
W-17-006 through W-17-014
**WALLINGFORD COMMUNITY
COUNCIL'S PRELIMINARY WITNESS &
EXHIBITS LIST**

The Wallingford Community Council submits the following list of potential
witnesses and exhibits as required by the Second Prehearing Order entered on February 16,
2018.

POTENTIAL WITNESSES:

WCC does not plan to call any witnesses in its case in chief unless required to
provide foundations for the admission of the exhibits listed below. Appellant reserves the
right to call witnesses in rebuttal to witnesses and exhibits identified or offered by the City
of Seattle, and to call witnesses identified by the City or other appellants.

1 **POTENTIAL EXHIBITS:**

2 On January 5, 2018, WCC propounded Interrogatories and Requests for Production
3 to the City of Seattle. The deadline for the City’s compliance was extended at the request of
4 the City until April 11, 2018.

5 Approximately one week before the deadline for the submission of this Preliminary
6 Witness and Exhibits List, the undersigned received initial discovery responses from the
7 City. Additional responses were received one business day prior to the deadline. The
8 undersigned has not had a sufficient opportunity to review the thousands of documents
9 provided. Discovery responses by the City are incomplete. WCC reserves the right to
10 supplement this preliminary designation once a reasonable opportunity has been provided
11 for a review of the City’s discovery responses.

12 WCC also reserves the right to offer exhibits designated by the City of Seattle or
13 other appellants.

- 14
- 15 1. Final Environmental Impact Statement for the Citywide Implementation of
16 Mandatory Housing Affordability (MHA) including its exhibits, comments and
17 responses to comments.
 - 18 2. SEPA Environmental Checklist, Updated 2014, re Affordable Housing Mitigation
19 Program and Incentive Zoning Update; Comprehensive Plan Changes Regarding
20 Affordable Housing.
 - 21 3. SEPA Threshold Determination for the Affordable Housing Mitigation Program and
22 Incentive Zoning Update; and Comprehensive Plan Amendments Regarding
23 Affordable Housing, June 8, 2015.
 - 24 4. Land Use Information Bulletin, Notice of Proposed Legislation, Comprehensive Plan
25 Amendments, and Environmental Determination, Approx. June 23, 2017.

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5. Statement of Intent for Basic Framework for Mandatory Inclusionary Housing and Commercial Linkage Fee, July 13, 2015.
6. OPCD Summary and Fiscal Note re MHA framework.
7. Director's Report, Mandatory Housing Affordability for Residential Development ("MHA-R") Legislation. May 2016
8. Written comments submitted to City of Seattle departments and City Council regarding MHA-R and DEIS.
9. Written comments submitted to City of Seattle departments and City Council regarding EIS scoping.

Respectfully submitted this 2nd day of April, 2018.



Lee Raaen, WSBA # 6258
Attorney for Wallingford Community
Council


CERTIFICATE OF SERVICE

This document was filed on this date by E-file with the Seattle Hearing Examiner's Office.

The undersigned certifies under penalty of perjury under the laws of the State of Washington that this Preliminary Witness and Exhibit list was served on all the parties' attorneys of record or on their authorized representatives of record at the email addresses listed below:

- Jeff S Weber, Jeff.Weber@seattle.gov;
- PCD_MHAEIS, MHAEIS@seattle.gov;
- Daniel B Mitchell, Daniel.Mitchell@seattle.gov;
- Geoffrey Wentlandt, Geoffrey.Wentlandt@seattle.gov;
- Beacon Hill Council, mira.latoszek@gmail.com;
- Friends of Ravenna-Cowen, Judy Bendich jebendich@comcast.net
- Coalition for Affordability, newman@bnd-law.com;
- Fremont NC, toby@louplop.net;
- Friends of North Rainier, masteinhoff@gmail.com;
- Tadas Kiselius, tak@vnf.com;
- Cara Tomlinson, cat@vnf.com;
- Clara Park, cpark@vnf.com;
- SUN, booksgalore22@gmail.com;
- West Seattle Junction, rkoehler@cool-studio.net;
- West Seattle Junction Gen, admin@wsjuno.org.
- Morgan Community Association, Deb Barker, djb124@earthlink.net

Dated: April 2, 2018 at Seattle, Washington.

By: 
G. Lee Raaen, Attorney
Wallingford Community Council