

1 RECEIVED BY
2 2018 APR -2 PM 2:03
3 OFFICE OF
4 HEARING EXAMINER

RECEIVED BY
2018 MAR 30 PM 1:45
OFFICE OF
HEARING EXAMINER

7
8 BEFORE THE HEARING EXAMINER
FOR THE CITY OF SEATTLE

9 In the Matter of the Appeals of
10 WALLINGFORD COMMUNITY
11 COUNCIL, ET AL.
12 Of Adequacy of FEIS Issued by the
13 Director, Office of Planning and
14 Community Development

Hearing Examiner File:
W-17-006 through
W-17-014

PRELIMINARY WITNESS AND EXHIBIT LIST
OF JUNCTION NEIGHBORHOOD
ORGANIZATION

16 TO: Respondent City of Seattle and to its Seattle Office of Planning and Community
17 Development ("OPCD") and its Attorneys

18 AND TO: All Appellants' attorneys and Authorized Representatives listed on the Certificate of
19 Service attached hereto as Exhibit A.

20 Pursuant to the Second Prehearing Order, Appellant Junction Neighborhood Organization
21 ("JuNO") submits its Preliminary Witness and Exhibit List.

22
23
PRELIMINARY WITNESS AND EXHIBIT LIST –
JUNCTION NEIGHBORHOOD ORGANIZATION - Page 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23

I. RESERVATION OF RIGHTS

Identification of Additional Witnesses and Exhibits. On or about March 22, 2018, OPCD produced voluminous documents purportedly responsive to JuNO's Requests for Production served on 1/17/18. OPCD has not yet provided answers to JuNO's Interrogatories and Requests for Production, also served on 1/17/18. JuNO's review of the OPCD's discovery responses may reveal additional witnesses and documents critical to fully presenting JuNO's case. Therefore, JuNO reserves the right to supplement this Preliminary Witness and Exhibit List in the Final Witness and Exhibit List.

Witnesses and Exhibits Identified by Other Parties. Additionally, the Appellant reserves the right (a) to call any witness identified by any party, including any other appellant, (b) to use any of the documents and/or exhibits identified by any other party, including any other appellant, (c) to call substitute witnesses if any identified witness becomes unavailable, (d) to call rebuttal witnesses, (e) to call additional witnesses as allowed by Seattle Hearing Examiner Rules, and. (f) to supplement this preliminary witness and document list as new or more information becomes available.

Time Estimates. The approximate time period for each witness's direct testimony does not include time to authenticate documents, arguments about the admissibility of documents if the Respondent will not stipulate to admission of the document(s), nor time for cross examination and re-direct testimony.

II. WITNESS LIST

1. Amanda Sawyer. Ms. Sawyer is a resident of the West Seattle Junction Urban Village ("Junction Urban Village") and the Director of the Junction Neighborhood Organization. If called, Ms. Sawyer would provide testimony regarding market rate units within the Junction Urban Village. Estimated Time: 60 minutes.

1 2. Janine Rees. Ms. Rees is a resident of West Seattle, a member of the JuNO Land Use
2 Committee (“JLUC”) and a State of Washington Compliance Safety and Health officer responsible for
3 enforcing regulations promulgated under RCW 49.17 and 49.26 (the WISHA Act and the Asbestos
4 Act). If called, Ms. Rees would provide testimony, including expert testimony, regarding the EIS’
5 analysis, if any of services and utilities, noise issues and air quality issues, and West Seattle Junction
6 conditions with respect thereto. Estimated Time 3:00.

7 3. David Dockendorf. Mr. Dockendorf is the principal of Pathfinder School and a former
8 member of the Seattle Public Schools capacity management taskforce. If called, Mr. Dockendorf
9 would testify with respect to West Seattle school capacities. Estimated Time: 45 minutes.

10 4. Ed Mirabel. Mr. Mirabel is a City of Seattle, Seattle Public Utilities employee. If
11 called, Mr. Mirabel would provide testimony regarding wastewater and storm water issues. Estimated
12 Time: 60 minutes.

13 5. City Employee or Agent to be determined. JuNO has asked in its Interrogatories
14 directed to the City for an identification of the person with primarily responsibility for the preparation
15 of the Parks & Open Space section of the FEIS and may call this individual as a witness to testify with
16 respect to the same. Estimated Time: 45 minutes.

17 6. Carl Guess. Carl Guess is a West Seattle resident and a member of JLUC. If called,
18 Mr. Guess would provide testimony with respect to Parks and Open Space and Biological Diversity
19 issues addressed in the FEIS. Estimated Time: 30 minutes.

20 7. City Employee or Agent to be determined. JuNO is awaiting OPCD’s response to
21 Interrogatories to determine the individual with personal knowledge of the content and analyses used
22 to support the Biological Diversity section of the FEIS and may call such individual to testify with
23 respect to the same. Estimated time: 1:30.

1 8. Christine M. Tobin-Presser, 4832 42nd Ave SW, Seattle, WA. Ms. Tobin-Presser is a
2 resident of the West Seattle Junction Hub Urban Village (“Junction Urban Village”) and a member of
3 JLUC. If called, Ms. Tobin-Presser would testify as to matters relating to the City’s proposed or to be
4 proposed amendments to the Comprehensive Plan relating to MHA. Estimated time: 1:45 minutes.

5 Ms. Tobin-Presser may also be called to testify as to matters relating to the City’s purported
6 community outreach relating to MHA. Estimated time: 2:00.

7 Ms. Tobin-Presser may also called to testify regarding existing character and aesthetics of
8 housing in the Junction Urban Village. Estimated time: 25 minutes.

9 9. Denise Derr. If called, Ms. Derr would provide testimony as to issues relating to the
10 City-sponsored April 19, 2016 HALA Night Out event. Estimated time: 30 minutes.

11 Ms. Derr may also called to testify regarding existing character and aesthetics of housing in
12 the Upper Queen Anne Urban Village. Estimated Time: 20 minutes.

13 10. Jesseca Brand. City of Seattle, Department of Neighborhoods. If called, JuNO would
14 seek Ms. Brand’s testimony regarding the City-sponsored April 19, 2016 HALA Night Out event.
15 Estimated time: 20 minutes.

16 11. Curt Weiss. Seattle Channel. If called, Mr. Weiss is expected to provide testimony
17 relating to the video recording of the City-sponsored April 19, 2016 Night Out event. Estimated time:
18 20 minutes.

19 12. Additional West Seattle Junction witnesses. JuNO is in the process of identifying 3-4
20 additional witnesses that will provide testimony with respect to occurrences at one or more of the
21 HALA Meetups identified in the Analysis described in Paragraph II.A.2 herein. JuNO would
22 anticipate that each witness would testify for approximately 15-20 min. Estimated time: 1:20.
23

1 13. Rosario-Maria Medina. 6701 Flora Ave S. Seattle WA 98108. If called, Ms. Medina
2 would provide testimony with respect to the HALA focus group selection process. Estimated time:
3 20 minutes.

4 14. Bonnie Williams. 3735 Wallingford Avenue North. Ms. Williams is a resident of
5 Wallingford and, if called, would provide testimony regarding specific areas of the MHA outreach
6 process. Estimated time: 30 minutes.

7 Ms. Williams may also be called to provide testimony regarding existing character and
8 aesthetics of housing in the Wallingford Residential Urban Village. Estimated time: 20 minutes.

9 15. Miranda Berner. 3822 Woodlawn Ave. N. Seattle, Wa. 98103. Ms. Berner is a
10 resident of Wallingford and, if called, would provide testimony regarding specific areas of the MHA
11 outreach process. Estimated time: 20 minutes.

12 16. Susanna Lin. 4220 Eastern Ave N, Seattle, WA 98103. Ms. Linn is a resident of
13 Wallingford and, if called, would provide testimony regarding specific areas of the MHA outreach
14 process. Estimated time: 20 minutes.

15 17. Donn Cave. 3803 Ashworth North Seattle 98103. Mr. Cave is a resident of
16 Wallingford and, if called, would provide testimony regarding specific areas of the MHA outreach
17 process. Estimated time: 20 minutes.

18 18. Tomasz Biernacki. 3120 SW Avalon Way #403 Seattle WA 98126. Mr. Biernacki is a
19 resident of the Junction Urban Village and, if called, would testify with respect to visual renderings of
20 potential new development. Estimated time: 25 minutes.

21 19. Thomas Malone. 2208 NW Market St., #414 Seattle, WA 98107. Mr Malone is a
22 resident of Ballard and co-chair of the Smart Growth for Ballard Transportation and Urban Design
23

1 committee. If called, Mr Malone would provide testimony with respect to Ballard's 2017 zoning
2 changes. Estimated time: 30 minutes.

3 20. Kirk Robbins. 936 NW 51st St. Seattle, WA 98107. Mr. Robbins is a resident of
4 Ballard. Mr. Robbins would provide testimony with respect to the proposed expansion of the Ballard
5 urban village. Estimated time: 20 minutes.

6 21. Kim Barnes. 9057 21st Ave SW, Seattle 98106. Ms. Barnes is a resident of
7 Westwood-Highland Park and, if called, would provide testimony regarding existing character and
8 aesthetics of housing in the Westwood-Highland Park Residential Urban Village. Estimated time: 20
9 minutes.

10 22. Gregory Hill. 1215 N 47th Street, Seattle, Washington 98103. Mr Hill is a resident
11 Wallingford and an architect and would provide testimony regarding the effects of the proposed
12 zoning changes. Mr. Hill's personal bio is attached hereto as Exhibit A. Estimated time: 40 minutes.

13 23. Michael Kahrs. 2208 NW Market St., #414 Seattle, WA 98107. Mr. Kahrs is a
14 resident of Ballard. Mr. Kahrs would provide testimony with respect to existing character and
15 aesthetics of housing in Central Ballard. Estimated Time: 20 minutes.

16 24. Jennifer Scarlett. 1045 S Sullivan St, Seattle, WA. Ms. Scarlett is a resident of the
17 South Park neighborhood and would p provide testimony regarding existing character and aesthetics
18 of housing in the South Park Residential Urban Village. Estimated time: 20 minutes.

19 25. Philip Tavel. Mr. Tavel is a resident of the Morgan Junction neighborhood and would
20 provide testimony regarding existing character and aesthetics of housing in the Morgan Junction
21 Residential Urban Village. Estimated time: 20 minutes.

1 26. Mira Latoszek. 2218 14th Ave. S. Seattle 98144. Ms. Latoszek is a resident of the
2 Beacon Hill neighborhood and would provide testimony regarding existing character and aesthetics of
3 housing in the North Beacon Hill Urban Village. Estimated time: 20 minutes.

4 27. Talis Abolins. Mr. Abolins is a resident of the North Rainier neighborhood and, if
5 called, would provide testimony regarding existing character and aesthetics of housing in the North
6 Rainier Urban Village. Estimated time: 20 minutes.

7 28. Bill Bradburd. 1642 S. Lane Street, Seattle, WA. If called, Mr. Bradburd would
8 provide testimony regarding existing character and aesthetics of housing in the 23rd and Union-
9 Jackson Urban Village. Estimated time: 20 minutes.

10 29. LeMoyne Harwell. If called Mr. Harwell would provide testimony regarding existing
11 character and aesthetics of housing in the Madison Miller Urban Village. Estimated time: 20
12 minutes.

13 30. Judy Bendich. Ms. Bendich is a resident of the Ravenna-Cowen neighborhood. If
14 called, Ms. Bendich would provide testimony with respect to the existing character and aesthetics of
15 housing in the Roosevelt Urban Village. Estimated Time: 20 minutes.

16 31. David Moehring. 3444 23rd Avenue West, Seattle 98199. Mr. Moehring is an architect
17 and a resident and Land Use Committee chair of the Magnolia Community Council. If called, Mr.
18 Moehring would provide testimony with respect inadequacy of the MHA FEIS compared to other
19 recent studies completed in Seattle, as well as the areas of Seattle where the impacts of height, bulk
20 and scale have not been adequately considered. Estimated Time: 45 minutes.

21 32. Witness to be Determined. JuNO intends to call a witness to testify with respect to the
22 various matters discussed in the City of Seattle Uptown Urban Center Rezone EIS. Estimated Time:
23 30 minutes.

1 33. David Goldberg, City of Seattle. Mr. Goldberg is employed by the City of Seattle and
2 was involved with drafting the new zoning ordinance in coordination with the Smart Growth for
3 Ballard Transportation and Urban Design committee. Estimated Time: 60 minutes.

4 34. Aditi Kambuj, City of Seattle. Ms. Kambuj is employed by the City of Seattle and was
5 involved with drafting the new zoning ordinance in coordination with the Smart Growth for Ballard
6 Transportation and Urban Design committee. Estimated Time: 30 minutes.

7 35. Rick McLaughlin, 4133 University Way NE, Seattle, WA 98105. Mr. McCaughlin will
8 involved with the U District Urban Design Framework and the University District upzone and will
9 testify about the process. Estimated Time: 60 minutes.

10 36. JuNO may call one or more expert witnesses to testify as to matters relating to urban
11 design and planning and aesthetic, height, bulk, scale and other related impacts likely to result from
12 the City's MHA proposal. As of the date of this disclosure, JuNO has not definitively identified such
13 expert(s). As such, JuNO cannot meaningfully estimate the time for its experts' testimony.

14 37. Rich Koehler, 5212 49th Ave SW, Seattle, WA 98136. Mr. Koehler is a resident of
15 West Seattle, a member of the JuNO Land Use Committee, and is representing JuNO as an appellant.
16 Mr. Koehler will testify concerning the following matters:

17 (a) Current and past use of California Avenue as it relates to Historic and Cultural issues, and
18 similar matters elsewhere in the Junction. Estimated Time: 20 minutes.

19 (b) The Junction Neighborhood Design Guidelines and the Junction's portion of the Seattle
20 2025 Comprehensive Plan (Neighborhood Plans) as they relate to FEIS impacts. Estimated Time: 20
21 minutes.

22 (c) Seattle's design review process as it relates to SEPA impact analysis. Estimated Time: 30
23 minutes.

1 (d) A comparison of notable differences between this FEIS as compared to that of University
2 District EIS, and Seattle's Uptown EIS. Estimated Time: 20 minutes.

3 (e) Action alternatives that could achieve the objectives of the proposed action that could have
4 been explored in the FEIS. Estimated Time: 20 minutes.

5 (f) Traffic, transit, and street conditions in and through the Junction, and the corresponding
6 data and discussion in the FEIS. Estimated Time: 60 minutes.

7 (g) The Grand Bargain and its impact on the proposed action. Estimated Time: 30 minutes.

8 (h) The actions of the members of the Junction Neighborhood Organization to create
9 awareness and alternatives and the responses by the community, as a demonstration of the inadequacy
10 of reasonable notice. Estimated Time: 15 minutes.

11 (i) Responses to the City's HALA online comments site, hala.consider.it. Estimated Time: 10
12 minutes.

13 (j) City's inadequacy of responses to DEIS feedback. Estimated Time: 30 minutes.

14 (k) The current form of the Junction as compared to its depiction in the FEIS. Estimated
15 Time: 30 minutes.

16 38. JuNO may call one or more expert witnesses to testify as to matters relating to traffic,
17 transit, and parking impacts that may arise from the City's MHA proposal. As of the date of this
18 disclosure, JuNO has not definitively identified such expert(s). As such, JuNO cannot meaningfully
19 estimate the time for its experts' testimony.

20 39. JuNO may call one or more expert witnesses to testify as to matters relating to historic
21 and cultural impacts that may arise from the City's MHA proposal. As of the date of this disclosure,
22 JuNO has not definitively identified such expert(s). As such, JuNO cannot meaningfully estimate the
23 time for its experts' testimony.

- 1 14. City of Seattle 2017 Adopted and 2018 Endorsed Budget document;
- 2 15. City of Seattle Budget documents for 2014-2018.
- 3 16. National Fire Protection Association (“NFPA”) 1710 and 1720;
- 4 17. Seattle Fire Department 2017, 2018 Proposed Budget Report document;
- 5 18. City of Seattle budget for Seattle Fire Department 2014, 2015, 2016, 2017, 2018;
- 6 19. Seattle City Budget Office document: “Arrival of an engine company within 4 minutes
- 7 travel time to 90 percent of fire suppression incidents per quarter;”
- 8 20. City of Seattle published data regarding fire response times;
- 9 21. Seattle Public Schools (“SPS”) school enrollment projections and enrollment data and
- 10 enrollment reports for 2006-2017;
- 11 22. Seattle Public Schools 2012 Facilities Master Plan;
- 12 23. Seattle 2035 Comprehensive Plan FEIS;
- 13 24. Inventory of West Seattle Junction city blocks with sewer lines that are less than 12
- 14 inches;
- 15 25. Seattle Public Utilities (“SPU”) Drainage and Wastewater Integrated System Planning
- 16 document;
- 17 26. SPU Review of Adaptation to Climate Risk by Cities document;
- 18 27. SPU Drainage and Wastewater Adopted Capital Improvement Programs Document.;
- 19 28. Voice mail recording of SPU employee Ed Mirabel;
- 20 29. Occupation Safety and Health Act (“OSHA”) EAR Noise Nav 1.8
- 21 30. Environmental Protection Agency (“EPA”) Noise from Construction Equipment
- 22 publication;
- 23

- 1 31. National Institute of Occupational Safety and Health (“NIOSH”) Heavy Construction
2 Noise study;
- 3 32. Washington State Labor and Industries Noise Basics;
- 4 33. OSHA Noise in Construction Pocket Guide;
- 5 34. University of Washington Department of Environmental and Occupational Health
6 Sciences publication, Construction Industry Noise Exposure;
- 7 35. University of Washington Department of Environmental and Occupational Health
8 Sciences publication, Noise and Hearing Damage in Construction Apprentices;
- 9 36. Washington Department of Transportation Construction Noise Impact Assessment,
10 Chapter 7;
- 11 37. Seattle Municipal Code Noise Regulations;
- 12 38. Washington Administrative Code (WAC) 296-63-2-07707;
- 13 39. WAC 296-65;
- 14 40. Puget Sound Clean Air Agency (“PSCAA”) Regulation III;
- 15 41. Rees violations of the Asbestos Act;
- 16 42. WISHA citations issued with dry removal of asbestos;
- 17 43. WAC 296-155 lead regulations;
- 18 44. Rees violations of WAC 296-62-077;
- 19 45. PSCAA air quality permit for Nucor;
- 20 46. Janine Rees Labor and Industries training records;
- 21 47. City Responses To JLUC comments to DEIS;
- 22 48. Seattle Parks & Recreation 2017 Parks & Open Space Plan;
- 23 49. City of Seattle Urban Forest Stewardship Plan 2013;

- 1 50. Sections of the Seattle 2035 Comprehensive Plan;
- 2 51. Sections of the Washington State Growth Management Act;
- 3 52. Market data regarding real estate prices in Seattle and King County;
- 4 53. Market data regarding population growth in Seattle and King County;
- 5 54. Analysis and Assessment of Parks & Open Space in City of Seattle;
- 6 55. 2016 Seattle Tree Canopy Assessment;
- 7 56. City of Seattle Executive Order 2017-11: Tree Protection;
- 8 57. Seattle Parks & Recreation 2017 Parks & Open Space Plan;
- 9 58. City of Seattle Urban Forest Stewardship Plan 2013;
- 10 59. City of Seattle Canopy Assessments – 2015;
- 11 60. City of Seattle Canopy Assessments – 2016;
- 12 61. Datasets from Seattle Open Data Portal;
- 13 62. Analysis and Assessment of Tree Canopy in West Seattle Junction Urban Village;
- 14 63. Sections of the Seattle 2035 Comprehensive Plan;
- 15 64. Sections of the Washington State Growth Management Act;
- 16 65. *Market data regarding real estate prices in Seattle and King County;*
- 17 66. Market data regarding population growth in Seattle and King County;
- 18 67. West Seattle Junction Neighborhood Plan as included in Seattle 2035 Comprehensive
19 Plan;
- 20 68. March 8, 2017 letter from Junction Neighborhood Organization (“JuNO”) to Director
21 Samuel Assefa, OPCD;
- 22 69. March 9, 2017 Email from Samuel Assefa;
- 23 70. JuNO Proposed Comprehensive Plan Amendment;

- 1 71. Seattle City Council Legislative Summary Res 31762;
- 2 72. July 10, 2017 Memo from Samuel Assefa to City Planning Land Use Committee;
- 3 73. Notice of Open Houses;
- 4 74. Meeting in a Box Document;
- 5 75. Public Records Request No. C019241-101817;
- 6 76. Copies of Sticker Dot Charts from October 10, 2017 City Open House relating to
- 7 Comprehensive Plan Amendments;
- 8 77. Summary of Sticker Dot Results from October 10, 2017 City Open House;
- 9 78. Copies of Flip Pads from October 10, 2017 City Open House;
- 10 79. Summary of Flip Pad Comments;
- 11 80. Printout of Data located at <https://seattle2035.consider.it>;
- 12 81. Summary of Consider.it data;
- 13 82. Public Records Request No. C021277-121017;
- 14 83. Public Records Request No. C021276-121017;
- 15 84. All correspondence relating to West Seattle included in response to Public Request
- 16 Request Nos. C021276-121017 and/or C021277-121017;
- 17 85. Public Records Request No. C021868-122717;
- 18 86. Public Records Request No. C021869-122717;
- 19 87. Comments provided at City sponsored October 26, 2017 open house provided in
- 20 response to Public Records Request No. C021868-122717 and C021869-122717;
- 21 88. Public Records Request No. C021866-122717;
- 22 89. Public Records Request No. C021867-122717;
- 23

1 90. All correspondence included in City's response to Public Request Request Nos. Public
2 Records Request No. C021866-122717 and C021867-122717;

3 91. Copies of the following Public Records Requests (requests only): C010300-022517;
4 C011047-031517; C011283-032117; C011284-032117; C011281-032117; C011186-032017;
5 C011051-031517; C011619-033017; C011621-033017; C011623-033017; C011281-032117;
6 C010300-022517; C011183-032017; C011691-033117; C013542-051717; C013543-051717; and
7 C011284-032117.

8 92. Analysis of Junction Urban Village Feedback to Proposed MHA Upzones ("Junction
9 Analysis") submitted as part of the comments to the MHA Draft Environmental Impact Statement
10 submitted by the Junction Neighborhood Organization ("JuNO"). The Junction Analysis has the
11 following exhibits:

Ex.	Description
A	Chart of HALA "Meetups" Provided by City
B	Notice of Community Meetings for Seattle 2035 Draft Plan
C	November 12, 2015 West Seattle Blog Article re: Seattle 2035 Meeting
D	Slide Deck from Draft Plan Open House (City-designated HALA Meetup)
E	City Notes from November 12, 2015 Seattle 2035/HALA Meeting
F	Attendee Surveys from November 12, 2015 Seattle 2035 Meeting
G	Summary of Surveys in Exhibit F
H	December 8, 2015 West Seattle Blog article re: December 2, 2015 Southwest District Council Meeting (City-designated HALA Meetup)
I	Internal City Notes and Emails regarding December 2, 2015 Southwest District Council Meeting (City-designated HALA Meetup)
J	Power Point Presentation for December 2, 2015 Southwest District Council Meeting (City-designated HALA Meetup)
K	Intentionally Blank
L	Transcript of January 20, 2016 City presentation at Morgan Community Association (City-designated HALA Meetup)
M	Emails regarding notice for HALA Telephone Town Halls
N	Transcript of Mayor Murray's Telephone Town Hall February 4, 2016 (City-designated HALA Meetup)
O	Transcript of February 23, 2016 Housing Levy presentation City-designated HALA Meetup)

1	P	Transcript of March 12, 2016 West Seattle VIEWS Gathering of Neighbors (City designated HALA Meetup)
2	Q	Materials handed out by City at August 21, 2016 West Seattle Farmer's Market (City-designated HALA Meetup)
3	R	March 7, 2017 Email from C. Tobin-Presser to Melia Brooks of Public Records Center
4	S	Notice of September 25, 2016 West Seattle Summer Parkways Event (City-designated HALA Meetup)
5	T	Notice of City Scoop West Seattle Summer Parkways Event
6	U	Materials handed out by City at September 25, 2016 City Scoop event
7	V	Comments provided by September 25, 2016 City Scoop attendees
8	W	Results of sticker dot survey conducted by City at September 24, 2016 City Scoop event
9	X	October 20, 2016 West Seattle Blog article re: draft MHA maps
10	Y	May 15, 2017 Email to C. Tobin-Presser summarizing small-group walk (City-identified HALA Meetup)
11	Z	Transcript of November 15, 2016 presentation by City to JuNO (City-identified HALA Meetup)
12	AA	Intentionally Blank
13	BB	Chart of Community Feedback from November 15, 2016 presentation; December 7, 2016 Shelby's open house and January 26, 2017 MHA workshop.
14	CC	Mailer for Shelby's Open House December 7, 2016 (City-identified HALA Meetup)
15	DD	December 1, 2016 West Seattle Blog article re: Shelby's open house
16	EE	December 5, 2016 West Seattle Blog article re: Shelby's open house
17	FF	December 7, 2016 West Seattle Blog article re: Shelby's open house
18	GG	Flip Pad Comments from December 7, 2016 Shelby's open house
19	HH	Comments handed in at December 7, 2016 Shelby's open house
20	II	March 10, 2017 email from Jesseca Brand re: Shelby's open house
21	JJ	April 24, 2017 email from Spencer Williams to C. Tobin-Presser re: January 26, 2017 MHA workshop
22	KK	January 26, 2017 email from Spencer Williams re: January 26, 2017 MHA workshop
23	LL	March 3, 2017 email from C. Tobin-Presser to Spencer Williams enclosing table summaries from January 26, 2017 MHA workshop
	MM	Written comments from January 26, 2017 MHA workshop
	NN	Summary of January 26, 2017 MHA workshop provided by City on HALA website
	OO	Copies of tweets by Matt Hutchins
	PP	Closing Argument by Queen Anne Community Council in Hearing Examiner File W-16-004
	QQ	March 8, 2017 correspondence from JuNO to Samuel Assefa, Office of Planning and Community Development
	RR	January 25, 2017 West Seattle Transit Blog article
	SS	February 27, 2017 article from The Urbanist
	TT	Emails to and from HALAinfo@seattle.gov
	UU	Summary of emails to and from HALAinfo@seattle.gov
	VV	List of HALA Focus Group members
	WW	Focus Group meeting agenda published by City

PRELIMINARY WITNESS AND EXHIBIT LIST –
 JUNCTION NEIGHBORHOOD ORGANIZATION - Page 16

1	XX	JuNO Proposed Amendment to Comprehensive Plan
2	YY	Seattle 2035 – Portions of West Seattle Junction Urban Village Neighborhood Plan
3	ZZ	City's published summary of West Seattle Junction feedback re: HALA
4	AAA	Chart of concerns by table at January 26, 2017 MHA workshop
5	BBB	Copies of Flip Pads
6	CCC	Table of Comments from May 5, 2017 MHA open house
7	DDD	Transcript of May 30, 2017 City Council briefing on HALA by Sara Maxana
8	EEE	Notice of March 30, 2017 Reddit HALA "Meetup"

93. Printouts from the City's hala.consider.it website;
94. Summary of data from City's hala.consider.it website;
95. Draft email from Denise Derr to Jesseca Brand (unsent);
96. Video of April 19, 2016 HALA Night Out event;
97. April 26, 2016 Queen Anne News article regarding April 19, 2016 HALA Night Out event;
98. Numerous emails between Denise Derr and Jesseca Brand regarding April 19, 2016 HALA Night Out event;
99. Preliminary MHA Maps from October 2016;
100. Notice of HALA March 30, 2016 Wallingford Community Conversation;
101. *Agenda for January 7, 2017 Wallingford educational meeting;*
102. Comments from January 7, 2017 Wallingford educational meeting;
103. Summary of comments from January 7, 2017 educational meeting;
104. Summary Themes - January 17, 2017 design workshop;
105. 1 page summary of January 17, 2017 design workshop;
106. Analysis of tale comments from January 17, 2017 design workshop;
107. Video of March 14, 2017 Wallingford Find it Fix it event;
108. April 5, 2017 communication from Donn Cave to Rob Johnson and Spencer Williams;

- 1 109. Communication responsive to Donn Cave April 5, 2017 communication;
- 2 110. Seattle Channel video of May 30, 2017 City Council meeting;
- 3 111. Transcript of May 30, 2017 City Council meeting;
- 4 112. HALA Door Hanger;
- 5 113. Records relating to the ages of the homes in the proposed MHA areas in the Junction
6 Urban Village;
- 7 114. Photographs of various homes within the Junction Urban Village;
- 8 115. Renderings of potential development under MHA;
- 9 116. Photographs of various homes within the Westwood-Highland Park Urban Village;
- 10 117. Photographs of various existing homes within the South Park Residential Urban
11 Village;
- 12 118. Photographs of various existing homes within the Wallingford Residential Urban
13 Village;
- 14 119. Photographs of various existing homes within the Morgan Junction Residential Urban
15 Village;
- 16 120. Photographs of various existing homes within the North Beacon Hill Urban Village;
- 17 121. Photographs of various existing homes within the North Rainier Urban Village;
- 18 122. Photographs of various existing homes within the 23rd and Union-Jackson Urban
19 Village;
- 20 123. Photographs of various existing homes within the Upper Queen Anne Urban Village;
- 21 124. Photographs of various existing homes within the Madison Miller Urban Village;
- 22 125. Photographs of various existing homes within the Ravenna-Cowen neighborhood;
- 23

- 1 126. City of Seattle Office of Planning and Community Development Final EIS for Uptown
2 Urban Center Rezone;
- 3 127. Seattle’s Edge Impacts Maps showing areas on the proposed MHA preferred re-zoing
4 area;
- 5 128. Comparison of Uptown FEIS and comparison to the MHA-R FEIS;
- 6 129. Additional exhibits to be determined and identified in consultation with SCALE’s
7 ultimate expert witness(es);
- 8 130. Photographs of various existing homes in the proposed expansion of the Ballard Urban
9 Village;
- 10 131. Documents produced by the City of Seattle pertaining to the rezone of central Ballard;
- 11 132. Documents produced by the City of Seattle pertaining to the rezone of the University
12 District;
- 13 133. University District EIS January 8, 2015;
- 14 134. Uptown Urban Center Rezone EIS 3/2017;
- 15 135. Records relating to street permits for uses of California Avenue;
- 16 136. Photographs of historic murals within the Junction Urban Village;
- 17 137. Photographs of historic buildings on or near California Avenue;
- 18 138. Sections of the Seattle 2035 Comprehensive Plan;
- 19 139. “What makes the West Seattle Junction special”, a report by the West Seattle Junction
20 Historical Survey Group, 3/2016;
- 21 140. “West Side Story”, a book pertaining to the history of West Seattle;
- 22 141. Documents and records pertaining to the landmarks consideration and status of the
23 Hamm and Campbell buildings;

- 1 142. West Seattle Junction Neighborhood Design Guidelines;
- 2 143. West Seattle Junction Neighborhood Plan Policies and Guidelines from Seattle 2035
- 3 Comprehensive Plan;
- 4 144. West Seattle Triangle Land Use Code and Zoning Amendments, 9/1/11;
- 5 145. Recording of Full Council session regarding University District MHA, 2/21/17;
- 6 146. Photographs of transportation conditions within the Junction Urban Village and along
- 7 routes studied by the FEIS;
- 8 147. Photographs of electronic traffic signage within the Junction Urban Village;
- 9 148. A record of Google Maps queries;
- 10 149. Sections of the Seattle 2035 Comprehensive Plan;
- 11 150. SMC codes related to street construction and minimum street widths;
- 12 151. Seattle Streets Illustrated;
- 13 152. Director's Rule 5-2009 related to concurrency;
- 14 153. Terminal 5 EIS, Appendix C, 10/6/16;
- 15 154. oncentercity.org;
- 16 155. One Center City Near-term Project Overview, Proposed Near-term Projects, and
- 17 Potential Near-term Strategies;
- 18 156. "If you think Seattle traffic is bad now, just wait until these projects start", Seattle
- 19 Times, 1/7/18, and map excerpts;
- 20 157. "8 Lanes: Too many for Seattle's waterfront?", Seattle Times, 12/10/15;
- 21 158. One Center City Advisory Group presentation, 6/8/17;
- 22 159. Convention Center Addition DEIS 10/10/17;
- 23 160. Alaskan Way Viaduct Replacement Project EIS 7/2011;

- 1 161. WSDOT Standard Plans Manual;
- 2 162. WSDOT Transportation Design Manual;
- 3 163. WSDOT Transportation Design Manual, Chapter 320, Traffic Analysis;
- 4 164. WSDOT Traffic Analysis Guidebook;
- 5 165. WSDOT Traffic Analysis Tools Primer;
- 6 166. NCHRP Report 765: Analytical Travel Forecasting Approaches;
- 7 167. Highway Capacity Manual, Transportation Research Board, 2000 & 2010;
- 8 168. WSDOT Annual Traffic Reports, 2011-2016;
- 9 169. WSDOT Peak Hour Reports, 2011-2016;
- 10 170. WSDOT Speed Reports, Q1-Q4 2017;
- 11 171. The Grand Bargain;
- 12 172. Sections of the Seattle 2035 Comprehensive Plan;
- 13 173. Sections of the Seattle 2035 Comprehensive Plan EIS;
- 14 174. Email correspondence between Rich Koehler and Sam Assefa between 3/8/17 and
15 4/12/17, including attachments;
- 16 175. Seattle Ordinance #122799;
- 17 176. Recording of Full Council session regarding University District MHA, 2/21/17;
- 18 177. Seattle 2035 Urban Village Final Report, Peter Steinbruek, 8/2015;
- 19 178. Seattle project data presented through seattleinprogress.com, used for projects at
20 different stages of permitting and construction and their and housing counts;
- 21 179. West Seattle Triangle Land Use Code and Zoning Amendments, 9/1/11;
- 22 180. Seattle Planning Commission memo regarding neighborhood planning, 4/8/10;
- 23 181. WAC 197-11-425(4);

- 1 182. WAC 197-11-502;
- 2 183. List of noncompliant responses;
- 3 184. WAC 197-11-560;
- 4 185. Seattle Citywide Design Review guidelines;
- 5 186. Ordinance #125429;
- 6 187. Summary of Changes to Design Review Program, 11/2017;
- 7 188. Directors Report and Recommendation, Design Review Program;
- 8 189. Central Staff Memorandum re: Design Review, 9/18/17;
- 9 190. Documents not yet specifically identified relating to the impact of a number of projects
10 that passed design review; and
- 11 191. Documents not yet specifically identified relating to the degradation of Junction
12 conditions despite design reviews and ongoing agency monitoring.

13 **IV. ADDITIONAL ANTICIPATED EXHIBITS**
14 **AS PRODUCED BY THE CITY**

15 As previously noted the City recently produced tens of thousands of documents. Do to the
16 volume and timing, it is not possible for JuNO to have definitively identified specific exhibits. JuNO
17 anticipates the documents will contain, and JuNO will present as witnesses documents generally
18 described as follows:

- 19 1. Documents and reports to be produced by the City pertaining to small business
20 presence within the Junction Urban Village;
- 21 2. Documents and reports to be produced by the City pertaining to historic and cultural
22 impacts to the Junction Urban Village;
- 23

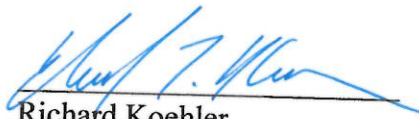
- 1 4. Daniel B. Mitchell at daniel.mitchell@seattle.gov
- 2 5. Alicia Reise at alicia.reise@seattle.gov (courtesy copy)
- 3 6. Tadas A. Kisielius at tak@vnf.com
- 4 7. Dale Johnson at dnj@vnf.com
- 5 8. Clara Park at cpark@vnf.com
- 6 9. Cara Tomlinson ctomlinson@vnf.com (courtesy copy)

7 Copies were sent to co-appellants at the following email addresses:

- 8 1. Wallingford Community Council (W-17-006): Lee Raaen at lee@lraaen.com
- 9 2. Morgan Community Association (W-17-007): Deb Barker at djb124@earthlink.net
- 10 3. Friends of Ravenna Cowen (W-17-008): Judith Bendich at jebendich@comcast.net
- 11 4. Fremont Community Council: Toby Thaler at toby@loupploup.net
- 12 5. Seattle Coalition for Affordability, Livability, and Equity (W-17-010): Claudia Newman at
13 newman@bnd-law.com
- 14 6. Seniors United for Neighborhoods (W-17-011): David Ward at
15 booksgalore22@gmail.com
- 16 7. Beacon Hill Council (W-17-012): Mira Latoszek at mira.latoszek@gmail.com
- 17 8. Friends of North Rainier Neighborhood Plan (W-17-013): Marla Steinhoff
18 masteinhoff@gmail.com;

18 I declare under penalty of perjury under the laws of the state of Washington that the foregoing
19 information is true and correct.

20 DATED this 2nd day of April, 2018, at Seattle, Washington.

21
22 

23 Richard Koehler
5212 49th Ave SW, rkoehler@cool-studio.net, 206-851-5256