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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In the Matter of the Appeals of	)	Hearing Examiner File:
	)	<b>W-17-006 through</b>
WALLINGFORD COMMUNITY	)	W-17-014
COUNCIL, ET AL.	)	
	)	FRIENDS OF RAVENNA-COWEN (W-17-008)
Of Adequacy of FEIS Issued by the	)	PRELIMINARY WITNESS AND EXHIBIT LIST
Director, Office of Planning and	)	
Community Development	)	
	)	

TO: Respondent City of Seattle and to its Seattle Office of Planning and Community Development (hereafter referred to as OPCD) and its Attorneys, and to all Appellants' attorneys and Authorized Representatives listed on the attached certificate of Service

Pursuant to the Second Prehearing Order, Appellant Friends of Ravenna-Cowen's submits its Preliminary Witness and Exhibit List. These lists are indeed preliminary. As of the preparation date of this Preliminary Witness and Exhibit List, the Respondent provided (on March 22, 2018 and March 28, 2018) tens of thousands of pages of documents in zip files, some of which are germane to Appellants' discovery requests, but Appellant's Authorized Representative has not had adequate time to fully review them. The Respondent has not answered the Appellant's First Interrogatories (served December 29, 2017), other than some, but not all, document requests among the March 22, 2018 documents, but the Appellant believes these are incomplete. Nor has the Respondent answered the interrogatory requests from other Appellants in this appeal.

Accordingly, the Appellant does not know whether any of the individuals listed below will  
PRELIMINARY WITNESS AND EXHIBIT LIST - 1

1 actually be called to testify as witnesses at the hearing or whether any of the exhibits listed below  
2 will actually be necessary at the hearing. Additionally, since the Respondent has not answered  
3 the Appellants' interrogatories, it is impossible to know whether there will be additional  
4 witnesses or exhibits for the hearing, including, but not limited to, City of Seattle employees and  
5 contractors, and City of Seattle documents and contractors' documents. And, after receipt of  
6 responses to written interrogatories and all the documents requested, the Appellant may schedule  
7 depositions based on the information received. Accordingly, given the truncated time to hearing,  
8 the Appellant's witnesses and exhibit list may not be available until the cut-off date for the final  
9 witness list and final exhibit list. If information from the Respondent becomes promptly  
10 available and if the information provided can be quickly digested (as opposed to thousands of  
11 documents at one time), then Appellant will supplement this Preliminary Witness and Document  
12 list as such information becomes available.

13  
14 Additionally, the Appellant reserves the right (a) to call any witness identified by any  
15 party, (b) to use any of the documents identified by any other party, (c) to call substitute  
16 witnesses if any identified witness becomes unavailable, (d) to call rebuttal witnesses, (e) to call  
17 additional witnesses as allowed by Seattle Hearing Examiner Rules, (f) to call City of Seattle  
18 employees and contractors identified in Appellants' discovery requests to the Respondent, (g) to  
19 introduce additional exhibits during cross-examination or rebuttal, and (h) to supplement this  
20 preliminary witness and document list as new or more information becomes available.

21 Time period for each witness's testimony per Hearing Examiner's Order. The approximate time  
22 periods for each witness's direct testimony (in parentheses at the end of each witness summary)  
23 does not include time to authenticate documents, argument about the admissibility of documents  
24  
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1 if the Respondent will not stipulate to admission of the document(s), nor time for cross  
2 examination and re-direct testimony.

3 APPELLANT FRIENDS OF RAVENNA-COWEN'S PRELIMINARY WITNESS LIST

4 Preliminary Expert Witness List:

5 1. Kern Ewing, Ph.D. Professor Ewing holds the position of Rachel A. Woods Professor at the  
6 School of Environmental and Forest Sciences, College of the Environment, University of  
7 Washington. His primary teaching duties include restoration ecology, restoration in North  
8 American ecosystems, ecological engineering, and restoration design. He currently teaches and  
9 trains students in ecological and engineering principles in a restoration curriculum. Professor  
10 Ewing participates in restoration projects with university-community partnerships. Among these  
11 are Union Bay Natural Area, Yesler Swamp, Ravenna Park, and Washington Department of  
12 Transportation SR 520 mitigation. Professor Ewing has also conducted extensive field research.  
13  
14 (1.5 hours)

15 2. Larry E. Johnson, AIA, LEED AP. Mr. Johnson is a licensed architect who formed the  
16 Johnson Partnership in 1979. Mr. Johnson has fostered a continuing interest in state and regional  
17 history, focusing on architectural and maritime heritage. He has consulted on historic evaluation  
18 and preservation projects ranging from local to national significance. He has practical experience  
19 both recommending and implementing the Secretary of the Interior's Standards for Historic  
20 Preservation. Mr. Johnson exceeds the Secretary of the Interior's Professional Qualification  
21 Standards for both Historic Architecture and Architectural History. He holds a master's degree in  
22 Architecture from the University of Washington with an emphasis on architectural history and  
23 historic preservation. He has spent more than thirty years in the field of preservation. Mr.  
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1 Johnson's partnership is located in the current Roosevelt Village, and he resides in Seattle's  
2 Ravenna neighborhood, knows its history and its buildings. (1.0 hours)

3 2. Lawrence Kreisman. Mr. Kreisman is an architectural historian, author, preservation  
4 consultant, and from 1997 – 2017 was the Program Director for Historic Seattle. Mr. Kreisman  
5 is knowledgeable about the development and importance of historic preservation in Seattle,  
6 housing and structures within Seattle such as Craftsman and bungalow homes, including those in  
7 the Ravenna neighborhood. See for example, his book *Made to Last: Historic Preservation in*  
8 *Seattle and King County* (1999). (1.5 hours)

9 3. Lorne McConachie, FAIA. Mr. McConachie has been a principal of Bassetti Architects  
10 since 1991. He has expertise in planning and design and the importance of meaningful  
11 community involvement with the public. (1.5 hours)

12 4. Woodrow (Woody) Wheeler. Since 2009, Mr. Wheeler has been the owner and operator of  
13 Conservation Catalyst, which conducts tours, makes educational presentations, teaches classes,  
14 and provides land conservation consulting services in birding and natural history. He has  
15 worked for the Nature Conservancy (1988 – 1989), Audubon Washington (Director of Audubon  
16 Centers, Washington, 1999 - 2004), and the Seattle Parks Foundation (Program Director, 2005 –  
17 2009). Mr. Wheeler has expertise in the flora and fauna of Ravenna and Cowen Parks and the  
18 contiguous area. (.75 to 1.0 hours)

19 5. Eugenia Woo. From 2009 to present, Ms. Woo has been the Director of Preservation  
20 Services at Historic Seattle where her duties include providing technical assistance, developing  
21 and implementing preservation advocacy policies and initiative, developing programs and  
22 managing projects, and engaging in community outreach and coordination of advocacy with  
23  
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1 community groups, individuals and local government. Ms. Woo submitted a letter on behalf of  
2 Historic Seattle during the MHA draft EIS process. (1.5 -2.0 hours)

3 Preliminary Lay Witness List:

4 1. Jim O'Halloran. Mr. O'Halloran resides in the Roosevelt neighborhood and was the former  
5 chair of the Roosevelt Neighborhood Association. With others Mr. O'Halloran worked on the  
6 Roosevelt Neighborhood Plan and Roosevelt Neighborhood Design Guidelines and would  
7 provide an overview of the community process and involvement. (.75 hours)

8 2. Marilyn Spotswood. Ms. Spotswood is the President of the Board of Friends of Ravenna-  
9 Cowen. She will provide an overview of the organization's purpose and activities. (.75 hours)

10 3. John Stewart. Mr. Stewart is a member of the Friends of Ravenna-Cowen board and has  
11 taken photos of Ravenna Park and the Ravenna neighborhood. (.5 hours)

12 4. Barbara Warren. Ms. Warren is now retired and previously worked on housing issues. She  
13 has worked as a volunteer with the Roosevelt Neighborhood Association, and most recently  
14 served on a working group of the RNA's Land Use Committee to bring 245 units of affordable  
15 housing to the site of the Roosevelt light rail station. (.5 hours)

16 5. Ann McGowan. Ms. McGowan resides in the Ravenna neighborhood and will testify about  
17 her personal experience re the proposed Roosevelt Urban Village expansion. (.333 hours)

18 6. Other possible lay witnesses have not yet been identified but may include displaced business  
19 owners and employees and residents of the Roosevelt Urban Village proposed up-zone area.

20  
21 APPELLANT FRIENDS OF RAVENNA-COWEN'S PRELIMINARY EXHIBIT LIST

22 1. Respondent's Answers to Appellant Friends of Ravenna-Cowen's Request for Admissions and  
23 the Exhibits thereto.

- 1 2. MHA Final EIS, comments/letters to the Draft EIS, appendices and exhibits, and other  
2 underlying documents, including but not limited to  
3 [http://www.seattle.gov/Documents/Departments/HALA/Policy/MHA\\_FEIS/Compiled\\_MHA\\_F](http://www.seattle.gov/Documents/Departments/HALA/Policy/MHA_FEIS/Compiled_MHA_F)  
4 [EIS\\_2017.pdf](http://www.seattle.gov/Documents/Departments/HALA/Policy/MHA_FEIS/Compiled_MHA_FEIS_2017.pdf);  
5 [http://www.seattle.gov/dpd/LUIB/AttachmentProjectID8686Compiled\\_MHA\\_FEIS\\_Appendices](http://www.seattle.gov/dpd/LUIB/AttachmentProjectID8686Compiled_MHA_FEIS_Appendices)  
6 [\\_2017.pdf](http://www.seattle.gov/dpd/LUIB/AttachmentProjectID8686Compiled_MHA_FEIS_Appendices_2017.pdf).
- 7 3. 2035 Comprehensive Plan and City Council, proposed amendments thereto, and amendments  
8 adopted by the City Council.
- 9 4. City of Seattle maps showing proposed expansion, up-zoning and zoning to the Roosevelt  
10 Urban Village.
- 11 5. Roosevelt Neighborhood Plan.
- 12 6. Roosevelt Design Guidelines.
- 13 7. 2015 cover letter from Mayor Edward B. Murray and the Seattle Department of Planning and  
14 Development and attached analysis prepared by Steinbrueck Urban Strategies, Seattle 2035  
15 Urban Village Study Final Report, August 2015,  
16 [http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web\\_informational/p2357239.pdf](http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2357239.pdf).
- 17 8. Mayor Edward B. Murray's Recommended 2035 Comprehensive Plan (May 2016).
- 18 9. Compilation from King County Assessor Records and other sources of the homes within the  
19 Respondent's proposed expansion of the Roosevelt Urban Village, alternatives 2, 3 and preferred  
20 and the area south of NE 65<sup>th</sup> St. to NE 62<sup>nd</sup> St. between 15<sup>th</sup> Avenue NE and 20<sup>th</sup> Ave. NE.
- 21 10. Compilation of actual and permitted housing units within the current Roosevelt Urban  
22 Village from City of Seattle Department of Construction & Inspections, "Land Use Information  
23  
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25

1 Bulletin" <http://web6.seattle.gov/dpd/luib/>, from Seattle in Progress,

2 <http://www.seattleinprogress.com/>, and Seattle DCI Shaping Seattle Building sat

3 <http://www.seattle.gov/dpd/shapingseattle/map.aspx>.

4 11. City of Seattle Department of Construction & Inspections GIS,

5 [http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf](http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2)  
6 [908e2241e9c2](http://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=f822b2c6498c4163b0cf908e2241e9c2).

7 12. Photographs taken and to be taken by Woody Wheeler and John Stewart of the Ravenna  
8 neighborhood east of 15<sup>th</sup> Avenue NE and south of NE 65<sup>th</sup> St. and Ravenna Park and Cowen  
9 Park.

10 13. Photographs taken by John Stewart and Woody Wheeler of flora and fauna in and around  
11 Ravenna Park and Cowen Park.

12 14. Urban Center/Village Growth Report through the 4<sup>th</sup> Quarter 2017 from Seattle Department  
13 of Construction & Inspection Permit Data Warehouse Building Construction Permits (January 8,  
14 2018).

15 15. Exhibit 1 to Friends of Ravenna-Cowen's Notice of Appeal.

16 16. Resume of Prof. Kern Ewing.

17 17. Resume of Mr. Larry Johnson.

18 18. Resume of Lawrence Kreisman.

19 19. Resume of Lorne McConachie.

20 20. Resume of Woody Wheeler.

21 21. Resume of Eugenia Woo

22 22. City of Seattle, Development Services Office, water and sewer maps,

23 [http://gisrevprxy.seattle.gov/wab\\_ext/DSOResearch\\_Ext/](http://gisrevprxy.seattle.gov/wab_ext/DSOResearch_Ext/).

24  
25 PRELIMINARY WITNESS AND EXHIBIT LIST - 7

FRIENDS OF RAVENNA-COWEN  
JUDITH E. BENDICH, WSBA# 3754  
AUTHORIZED REPRESENTATIVE,  
1754 NE 62<sup>ND</sup> ST., SEATTLE, WA 98115  
206-525-5914

- 1 23. Letter from Historic Seattle dated June 27, 2016 to Councilmember Rob Johnson re 2035  
2 Comprehensive Plan.
- 3 24. Letter from Historic Seattle dated October 30, 2015 re recommendations re 2035  
4 Comprehensive Plan.
- 5 25. Memorandum from Central Staff dated September 6, 2016 to Councilmember Rob Johnson,  
6 Chair, Councilmembers Mike O'Brien and Lisa Herbold, Members Planning, Land Use and  
7 Zoning Committee from Eric McConaghy and Lish Whitson, Central Staff re Amendments to  
8 Seattle 2035.
- 9 26. Memorandum from Central Staff dated September 19, 2016 to Councilmember Rob Johnson,  
10 Chair, Councilmembers Mike O'Brien and Lisa Herbold, Members Planning, Land Use and  
11 Zoning Committee from Eric McConaghy and Lish Whitson, Central Staff re Amendments to  
12 Seattle 2035.
- 13 27. Letter dated June 30, 2017 from Historic Seattle to Samuel Assefa, Director, Office of  
14 Planning and Development.
- 15 28. Letter dated August 4, 2017 from Eugenia Woo of Historic Seattle, Comments on  
16 Mandatory Housing Affordability, Draft Environmental Impact Statement.
- 17 29. Excerpts from *Made to Last, Historic Preservation in Seattle and King County*, Lawrence  
18 Kreisman (1999).
- 19 30. Excerpts from *The Arts and Crafts Movement in the Pacific Northwest*, Lawrence Kreisman  
20 (2007)
- 21 31. Articles written by Mr. Kreisman for the *Seattle Times*, including but not limited to  
22 [https://www.seattletimes.com/pacific-nw-magazine/restore-vs-raze/;](https://www.seattletimes.com/pacific-nw-magazine/restore-vs-raze/)  
23 [https://www.seattletimes.com/pacific-nw-magazine/saving-ourselves/;](https://www.seattletimes.com/pacific-nw-magazine/saving-ourselves/)  
24  
25



1 <https://www.seattletimes.com/pacific-nw-magazine/seattles-old-buildings-opportunities-not->  
2 [obstacles/](#); *Keeping Our Character, Seattle Times Pacific NW Magazine* (1/22/2012); *On*  
3 *Common Ground, Seattle Times Pacific NW Magazine* (1/10/2010); *Hanging Onto Home,*  
4 *Seattle Times Pacific NW Magazine* (1/11/2009).

5 32. Excerpts from UWREN , University of Washington Restoration Ecology Network Capstone  
6 Project (2015-2016), Clients: Ann Sevens, Friends of Ravenna, and Seattle Parks and Recreation.

7 33. Notice to Property Owners in the proposed Ravenna-Cowen North Historic District.

8 34. Preliminary application of Ravenna-Cowen North Historic District to DAHP Registry and  
9 National Registry of Historic Places, upon completion, the final application, and written  
10 communications from DAHP re the application.

11 35. Seattle Department of Neighborhoods Historic Resource Survey and documents/articles  
12 therein, <http://www.seattle.gov/neighborhoods/programs-and-services/historic->  
13 [preservation/historic-resources-survey#historicresourcesurveydatabase](#).

14 36. The contents of the Washington State Department of Archaeology and Historic Preservation,  
15 web site <https://dahp.wa.gov/>, and its WISAARD database,  
16 <https://fortress.wa.gov/dahp/wisaardp3/>.

17 37. Seattle Sustainable Neighborhoods Assessment Projects, prepared for City of Seattle  
18 Department of Planning and Development;  
19 [http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web\\_informational/p2233679.pdf](http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2233679.pdf);  
20 <https://www.seattle.gov/Documents/Departments/OPCD/OngoingInitiatives/SeattlesComprehens>  
21 [ivePlan/SSNAPReport2014.pdf](#).

1 38. *An Urban Resource Inventory for Seattle: A Visual Inventory of Buildings & Urban Design*  
2 *Resources for Seattle, Washington*, prepared for Historic Seattle and Preservation Authority by  
3 Consultants Folke Nyberg and Victor Steinbrueck, commenced in 1975.

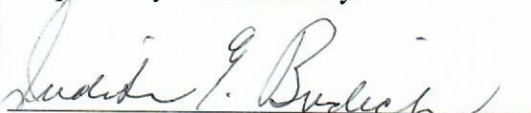
4 39. Pending further review, all documents relating in any way to historic resources that the  
5 Respondent provided in discovery, including, but not limited to, documents in folder  
6 COS\_Q001, documents provided in any other discovery, and documents provided in future  
7 discovery.

8 40. All documents concerning the 1979 "windshield" survey referred to at the web site for the  
9 Seattle Department of Neighborhoods, Historic Preservation,  
10 [http://www.seattle.gov/neighborhoods/programs-and-services/historic-preservation/historic-  
12 resources-survey#historicresourcesurveydatabase](http://www.seattle.gov/neighborhoods/programs-and-services/historic-preservation/historic-<br/>11 resources-survey#historicresourcesurveydatabase), believed to consist of indexes, maps, and  
13 inventory by neighborhood and parcel, and all other documents related to the 1979 survey in the  
14 possession or control of the City of Seattle.

15 41. November 14, 2015 letter to Diane Sugimura, Seattle Office of Planning and Development,  
16 from the Ravenna Bryant Community Association together with petition signed by 126 residents  
17 concerning expansion of the Roosevelt Urban Village east of 15<sup>th</sup> Avenue NE.

18 Dated: April 2, 2018

19 Respectfully Submitted By:

20 

21 Judith E. Bendich, WSBA # 3754  
22 Authorized Representative for Appellant  
23 Friends of Ravenna-Cowen  
24  
25

CERTIFICATE OF SERVICE

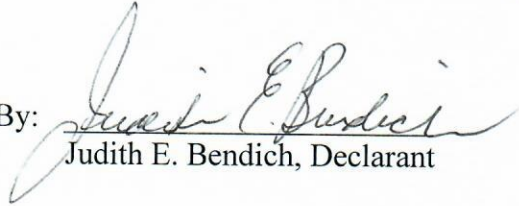
1 The undersigned certifies under penalty of perjury under the laws of the State of  
2 Washington:  
3

4 This Preliminary Witness and Exhibit list was served on all the parties' attorneys of  
5 record or on their authorized representatives of record at the email addresses listed below:  
6 Beacon Hill Council [mira.latoszek@gmail.com](mailto:mira.latoszek@gmail.com); Coalition for Affordability [newman@bnd-](mailto:newman@bnd-law.com)  
7 [law.com](mailto:law.com); Fremont NC [toby@louplop.net](mailto:toby@louplop.net); Friends of North Rainier [masteinhoff@gmail.com](mailto:masteinhoff@gmail.com);  
8 PCD\_MHAEIS [MHAEIS@seattle.gov](mailto:MHAEIS@seattle.gov); Morgan Community Association [djb124@earthlink.net](mailto:djb124@earthlink.net);  
9 Daniel B Mitchell [Daniel.Mitchell@seattle.gov](mailto:Daniel.Mitchell@seattle.gov); Geoffrey Wentlandt  
10 [Geoffrey.Wentlandt@seattle.gov](mailto:Geoffrey.Wentlandt@seattle.gov); Jeff S Weber [Jeff.Weber@seattle.gov](mailto:Jeff.Weber@seattle.gov); Tadas Kiselius  
11 [tak@vnf.com](mailto:tak@vnf.com); Cara Tomlinson [cat@vnf.com](mailto:cat@vnf.com); Amanda Kleiss [ack@vnf.com](mailto:ack@vnf.com); Dale Johnson  
12 [dnj@vnf.com](mailto:dnj@vnf.com); Clara Park [cpark@vnf.com](mailto:cpark@vnf.com); SUN [booksgalore22@gmail.com](mailto:booksgalore22@gmail.com); Wallingford CC  
13 [lee@lraaen.com](mailto:lee@lraaen.com); West Seattle Junction [rkoehler@cool-studio.net](mailto:rkoehler@cool-studio.net); West Seattle Junction Gen  
14 [admin@wsjuno.org](mailto:admin@wsjuno.org).

15  
16 This document has been filed by E-file with the Seattle Hearing Examiner's Office, Ryan  
17 Vancil, Deputy Hearing Examiner.

18 Dated: April 2, 2018 at Seattle, Washington.

19  
20 By:

  
21 Judith E. Bendich, Declarant