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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In Re: Appeal by  
  
Seattle Coalition for Affordability,  
Livability, and Equity  
  
of the City of Seattle Citywide  
Implementation of Mandatory Housing  
Affordability (MHA) Final Environmental  
Impact Statement

Hearing Examiner File No. W-17-010

APPELLANT SEATTLE COALITION  
FOR AFFORDABILITY,  
LIVABILITY, AND EQUITY'S  
PRELIMINARY WITNESS AND  
EXHIBIT LIST

Appellant Seattle Coalition for Affordability, Livability, and Equity (SCALE) hereby submits its witness and exhibit lists for the above-captioned appeal.

I. WITNESS LIST

Appellant may call the following witnesses to testify at the appeal hearing. The general subject matter of their expected testimony is noted below.

1. Christine M. Tobin-Presser. Ms. Tobin-Presser is a resident of the West Seattle Junction Hub Urban Village (“Junction Urban Village”) and, if called, would provide testimony regarding existing environment in and near the Junction Urban Village that will be affected by the MHA proposal. She would also testify about the probable significant adverse impacts of the MHA proposal and alternatives that would be specific to the Junction neighborhood and the inadequacy of

1 the disclosure and analysis of those impacts in the MHA EIS. Ms. Tobin-Presser would also testify  
2 as to matters relating to inconsistency of the MHA proposal with the current Comprehensive Plan and  
3 Neighborhood Plans, the City's process for amending the Comprehensive Plan, and the proposed  
4 amendments to the Comprehensive Plan. Ms. Tobin-Presser would also testify as to matters relating  
5 to inadequacy of the MHA EIS disclosure and analysis of inconsistencies of the MHA proposal with  
6 the current Comprehensive Plan and Neighborhood Plans and the failure of the MHA EIS to conduct  
7 a proper alternatives analysis for the proposed amendments to the Comprehensive Plan. Estimated  
8 time: 1 ½ hours.  
9

10 2. Tomasz Biernacki. Mr. Biernacki is a resident of the Junction Urban Village and, if  
11 called, would testify with respect to visual renderings of potential new development. Estimated time:  
12 25 minutes.  
13

14 3. Thomas Malone. Mr. Malone is a resident of Ballard. Mr. Malone would provide  
15 testimony with respect to the existing environment in Central Ballard that would be affected by the  
16 proposal. Mr. Malone would also testify about the probable significant adverse impacts of the MHA  
17 proposal and alternatives that would be specific to the Ballard Neighborhood and the inadequacy of  
18 the disclosure and analysis of those impacts and the alternatives analysis in the MHA EIS. Estimated  
19 Time: 20 minutes  
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21 4. Kirk Robbins. Mr. Robbins is a resident of Ballard. Mr. Robbins would provide  
22 testimony with respect to the existing environment in Central Ballard that would be affected by the  
23 proposal. Mr. Robbins would also testify about the probable significant adverse impacts of the MHA  
24 proposal and alternatives that would be specific to the Ballard Neighborhood and the inadequacy of  
25 the disclosure and analysis of those impacts and alternatives analysis in the MHA EIS. Estimated  
26 Time: 20 minutes

1           5.       Kim Barnes. Ms. Barnes is a resident of Westwood-Highland Park and, if called,  
2 would provide testimony regarding the existing environment in and near the Westwood-Highland Park  
3 Residential Urban Village that would be affected by the proposal. Ms. Barnes would also testify about  
4 the probable significant adverse impacts of the MHA proposal and alternatives that would be specific  
5 to the Westwood-Highland Park neighborhood and the inadequacy of the disclosure and analysis of  
6 those impacts and the alternatives analysis in the MHA EIS. Estimated time: 30 minutes.

8           6.       Gregory Hill. Mr. Hill is a resident Wallingford. If called, Mr. Hill would provide  
9 testimony regarding the existing environment in and near the Wallingford neighborhood that would  
10 be affected by the proposal. He would also testify about the probable significant adverse impacts of  
11 the MHA proposal and alternatives that would be specific to the Wallingford Neighborhood and the  
12 inadequacy of the disclosure and analysis of those impacts and the alternatives analysis in the MHA  
13 EIS. Estimated time: 40 minutes.

15          7.       Jennifer Scarlett. Ms. Scarlett is a resident of the South Park neighborhood and would  
16 provide testimony regarding the existing environment in and near the South Park Residential Urban  
17 Village that would be affected by the proposal. Ms. Scarlett would also testify about the probable  
18 significant adverse impacts of the MHA proposal and alternatives that would be specific to the South  
19 Park Neighborhood and the inadequacy of the disclosure and analysis of those impacts and the  
20 alternatives analysis in the MHA EIS. Estimated time: 20 minutes.

22          8.       Rosario Maria Medina. Ms. Medina is a resident of the Georgetown neighborhood and  
23 would provide testimony regarding the existing environment in and near the Georgetown that would  
24 be affected by the proposal. Ms. Medina would also testify about the probable public process for the  
25 MHA proposal and the MHA EIS as it relates to Georgetown residents. Estimated time: 20 minutes.

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1           9.       James Rasmussen. James Rasmussen is a member of the Duwamish Tribe and would  
2 testify about the inadequacy of the disclosure and analysis of environmental issues facing the  
3 neighborhoods within the study area along the Duwamish River. Estimated time: 20 minutes.

4           10.       Bonnie Williams. Ms. Williams is a resident of the Wallingford neighborhood and  
5 would provide testimony regarding the existing environment in and near the Wallingford Residential  
6 Urban Village that would be affected by the proposal. Ms. Williams would also testify about the  
7 probable significant adverse impacts of the MHA proposal and alternatives that would be specific to  
8 the Wallingford neighborhood and the inadequacy of the disclosure and analysis of those impacts and  
9 the alternatives analysis in the MHA EIS. Estimated time: 20 minutes.

10           11.       Philip Tavel. Mr. Tavel is a resident of the Morgan Junction neighborhood and would  
11 provide testimony regarding the existing environment in and near the Morgan Junction Residential  
12 Urban Village that would be affected by the MHA proposal. Mr. Tavel would also testify about the  
13 probable significant adverse impacts of the MHA proposal and alternatives that would be specific to  
14 the Morgan Junction neighborhood and the inadequacy of the disclosure and analysis of those impacts  
15 and the alternatives analysis in the MHA EIS. Estimated time: 20 minutes.

16           12.       Mira Latoszek. Ms. Latoszek is a resident of the Beacon Hill neighborhood and would  
17 provide testimony regarding the existing environment in and near the North Beacon Hill Urban Village  
18 that would be affected by the proposal. Ms. Latoszek would also testify about the probable significant  
19 adverse impacts of the MHA proposal and alternatives that would be specific to the Beacon Hill  
20 neighborhood and the inadequacy of the disclosure and analysis of those impacts and the alternatives  
21 analysis in the MHA EIS. Estimated time: 20 minutes.

22           13.       Talis Abolins. Mr. Abolins is a resident of the North Rainier neighborhood and, if  
23 called, would provide testimony regarding the existing environment in and near the North Rainier  
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1 Urban Village that would be affected by the proposal. Mr. Abolins would also testify about the  
2 probable significant adverse impacts of the MHA proposal and alternatives that would be specific to  
3 the North Rainier neighborhood and the inadequacy of the disclosure and analysis of those impacts  
4 and the alternatives analysis in the MHA EIS. Estimated time: 20 minutes.  
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6 14. Bill Bradburd. Mr. Bradburd would provide testimony regarding the existing  
7 environment in and near the 23<sup>rd</sup> and Union-Jackson Urban Village that would be affected by the  
8 proposal. Mr. Bradburd would also testify about the probable significant adverse impacts of the MHA  
9 proposal and alternatives that would be specific to the Central District neighborhood and the  
10 inadequacy of the disclosure and analysis of those impacts and the alternatives analysis in the MHA  
11 EIS. Estimated time: 20 minutes.  
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13 15. Denise Derr. If called, Ms. Derr would provide testimony regarding the existing  
14 environment in and near the Upper Queen Anne Urban Village that would be affected by the proposal.  
15 Ms. Derr would also testify about the probable significant adverse impacts of the MHA proposal and  
16 alternatives that would be specific to the Queen Anne neighborhood and the inadequacy of the  
17 disclosure and analysis of those impacts and the alternatives analysis in the MHA EIS. Estimated  
18 time: 20 minutes.  
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20 16. LeMoyne Harwell. Mr. Harwell would provide testimony regarding the existing  
21 environment in and near the Madison Miller Urban Village that would be affected by the proposal.  
22 Mr. Harwell would also testify about the probable significant adverse impacts of the MHA proposal  
23 and alternatives that would be specific to the Madison Miller neighborhood and the inadequacy of the  
24 disclosure and analysis of those impacts and the alternatives analysis in the MHA EIS. Estimated time:  
25 20 minutes.  
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1           17.     Judith Bendich. Ms. Bendich is a resident of the Ravenna-Cowen neighborhood. Ms.  
2 Bendich would provide testimony with respect to the existing environment in and near the Roosevelt  
3 Urban Village that would be affected by the proposal. Ms. Bendich would also testify about the  
4 probable significant adverse impacts of the MHA proposal and alternatives that would be specific to  
5 the Ravenna-Cowen and Roosevelt neighborhoods and the inadequacy of the disclosure and analysis  
6 of those impacts and the alternatives analysis in the MHA EIS. Estimated Time: 20 minutes.  
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8           18.     Maria Batayola, Owner of Jump Start (organizational development services). Ms.  
9 Batayola has B.A. in Political Science and in Theatre from the University of Washington, and an M.A.  
10 from City University LIOS. Ms. Batayola maintains a family home in the Beacon Hill community,  
11 where she resided for decades. She has remained active in Beacon Hill and the surrounding  
12 community through volunteer, community development and environmental justice activities,  
13 including the Beacon Hill Council, Filipino Community Center, the Beacon Hill Merchants  
14 Association, Seattle's Race and Social Justice Cabinet, the Community Coalition on Environmental  
15 Justice (co-founder), Co-Founder, Asian Pacific Islander Community Candidates Forum. She may be  
16 called as a fact witness and expert on issues relating to those portions of the FEIS which relate to  
17 environmental conditions in the Beacon Hill and surrounding communities, environmental justice,  
18 community health, gentrification and displacement. Estimated Time: 60 minutes.  
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21           19.     David Moehring. Mr. Moehring is an architect and a resident and Land Use Committee  
22 chair of the Magnolia Community Council. If called, Mr. Moehring would provide testimony with  
23 respect to the inadequacy of the MHA FEIS compared to other recent studies completed in Seattle, as  
24 well as the areas of Seattle where the impacts of height, bulk and scale have not been adequately  
25 considered. Estimated Time: 45 minutes.  
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1           20.     David Ward. Mr. Ward will testify about the inadequacy of the MHA EIS disclosure  
2 and analysis of the current environment and impacts of the MHA proposal outside of the Urban  
3 Villages and about projects in the pipeline that were not addressed in the MHA EIS. Estimated Time:  
4 20 minutes.

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

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

12           23.     Rick McLaughlin. Mr. McCaughlin was involved with the U District Urban Design  
13 Framework and the University District upzone and will testify about the process and how it compares  
14 to the process for the MHA and the MHA FEIS. Estimated Time: 60 minutes.

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16           24.     Thomas Veith, Principal at Thomas Veith, Designer. Mr. Veith has a Master's Degree  
17 in Architecture and is an instructor of Architectural Engineering at North Seattle Community College.  
18 Mr. Veith will testify as an expert witness about historic structures in the Wallingford community and  
19 the inadequacy of the MHA EIS disclosure and analysis of historic resources. Mr. Veith's Curriculum  
20 Vitae is included in Appellant's exhibit list. Estimated Time: one hour.

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22           25.     Eugenia Woo, Historic Seattle. Eugenia Woo is the Director of Preservation Services  
23 for Historic Seattle in Seattle, Washington. Ms. Woo will testify as an expert witness about  
24 alternatives, the impacts of the MHA proposal on historic resources, and the inadequacy of the MHA  
25 EIS disclosure and analysis associated with historic resource impacts and mitigation. Ms. Woo's  
26 Curriculum Vitae is included in Appellant's exhibit list. Estimated Time: one hour.

1           26.     William Reid, Principal, PNW Economics. Mr. Reid will testify as an expert about the  
2 inadequacy of the MHA EIS disclosure and analysis associated with housing impacts. Mr. Reid's  
3 Curriculum Vitae is included in Appellant's exhibit list. Estimated Time: one hour.

4           27.     Davidya Kasperzyk, AIA, Senior Consultant, Architecture, Urban Design and  
5 Bioregional Planning at Parametrix. Mr. Kasperzyk is an architect and will testify as an expert about  
6 the inadequacy of the MHA EIS disclosure and analysis associated with historic; open space; and  
7 height, bulk, and scale impacts. Mr. Kasperzyk's Curriculum Vitae is included in Appellant's exhibit  
8 list. Estimated Time: 1 ½ hours.

9           28.     Jeff Richardson, University of Washington School of Environmental and Forest  
10 Sciences Post-Doctoral Researcher. Dr. Richardson is a remote sensing and tree canopy assessment  
11 expert, and will testify regarding the City's tree canopy assessments. Mr. Richardson's Curriculum  
12 Vitae is included in Appellant's exhibit list. Estimated Time: 45 minutes.

13           29.     Michael Oxman. Mr. Oxman is a licensed arborist and will testify as an expert witness  
14 regarding the City's past history of and future ability to mitigate for impacts on trees and tree canopy.  
15 Mr. Oxman's Curriculum Vitae is included in Appellant's exhibit list. Estimated Time: 30 minutes.

16           30.     Steve Zemke. Mr. Zemke resides in the City of Seattle and serves on the City's Urban  
17 Forestry Commission. He will testify concerning the City's history of policies and ordinances  
18 regarding conservation of trees and tree canopy, and the City's process for updating those policies and  
19 ordinances. Estimated Time: 30 minutes.

20           31.     Spencer Howard, Northwest Vernacular. Mr. Howard is a Historic Preservationist,  
21 who co-founded Northwest Vernacular, Inc., in 2017, after spending 14 years as a partner at Artifacts  
22 Consulting, Inc. Mr. Howard has a MS in Historic Preservation from the University of Oregon (2001),  
23 with a concentration in preservation technology and design. He also has a BA in German and Spanish  
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1 from the University of Oregon (1999). Mr. Howard may be called to testify on the City’s historic and  
2 cultural resources, including the Mount Baker Park Addition near the North Rainier Urban Village,  
3 and the extent to which the City failed to adequately analyze those resources in the MHA EIS and  
4 failed to consider alternatives that would reduce harm to those resources. Mr. Howard’s Curriculum  
5 Vitae is included in Appellant’s exhibit list. Estimated Time: 45 minutes.  
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7 32. Lawrence Kreisman. Mr. Kreisman is an architectural historian, author, preservation  
8 consultant, and from 1997 – 2017 was the Program Director for Historic Seattle. Mr. Kreisman will  
9 testify about the development and importance of historic preservation in Seattle, housing and  
10 structures within Seattle such as Craftsman and bungalow homes, including those in the Ravenna  
11 neighborhood. He will testify about the inadequacy of the MHA EIS with respect to its disclosure and  
12 analysis of the existing environment and impacts associated with historic resources and the failure of  
13 the City to consider alternatives that would reduce harm to those resources. Mr. Kreisman’s  
14 Curriculum Vitae is included in Appellant’s exhibit list. Estimated Time: 1.5 hours.  
15

16 33. Peter Steinbrueck, Steinbrueck Urban Strategies. Mr. Steinbrueck will testify as an  
17 expert witness about the Steinbrueck Urban Strategies Seattle 2035 Urban Village Study (August  
18 2015), which is listed as an exhibit below. He will testify about the inadequacy of the MHA EIS  
19 disclosure and analysis of alternatives and impacts relevant to land use impacts and relevant to the  
20 Urban Village Study. He will also testify about the history of neighborhood planning and  
21 comprehensive planning to the extent that it is relevant to the MHA proposal and the inadequacy of  
22 the MHA EIS disclosure and analysis of land use impacts. Mr. Steinbrueck’s Curriculum Vitae is  
23 included in Appellant’s exhibit list. Estimated Time: 45 minutes.  
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25 34. Witness to be determined. SCALE intends to call a fact witness to testify with respect  
26 to the City of Seattle Uptown Urban Center Rezone EIS. As of the date of this disclosure, SCALE has

1 not definitively identified such expert(s). As such, SCALE cannot meaningfully estimate the time for  
2 its experts' testimony.

3 35. Witness to be determined. SCALE may call one or more expert witnesses to testify as  
4 to matters relating to urban design and planning and aesthetic, height, bulk, scale and other related  
5 impacts associated with the City's MHA proposal. As of the date of this disclosure, SCALE has not  
6 definitively identified such expert(s). As such, SCALE cannot meaningfully estimate the time for its  
7 experts' testimony.  
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9 36. Witness to be determined. SCALE may call one or more expert witnesses to testify as  
10 to matters relating to housing impacts associated with the City's MHA proposal. As of the date of this  
11 disclosure, SCALE has not definitively identified such expert(s). As such, SCALE cannot  
12 meaningfully estimate the time for its experts' testimony.  
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14 37. Witnesses named by other parties in this matter.

15 Appellant reserves the right to call any witness identified by any other party, to call additional  
16 rebuttal witnesses, to call additional witnesses to the extent that it is allowed by the City of Seattle  
17 Hearing Examiner Rules, and to call substitute witnesses if any of the witnesses identified above  
18 become unavailable.

19 II. EXHIBIT LIST

20 Appellant identifies the following exhibits it may use at the hearing in this matter:

21 1. Seattle City Council Bill 119184, including Attachments 1 and 2, summary and fiscal  
22 note, and Director's Report.

23 2. Draft Environmental Impact Statement for Seattle Citywide Implementation of  
24 Mandatory Housing Affordability (MHA), June 8, 3017.  
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- 1           3.       Final Environmental Impact Statement for Seattle Citywide Implementation of  
2 Mandatory Housing Affordability (MHA), November 9, 2017.
- 3           4.       Director's Report, Mandatory Housing Affordability for Residential Development  
4 Legislation (May, 2016).
- 5           5.       City of Seattle, Mandatory Housing Affordability Citywide Implementation  
6 PowerPoint presentation (Jan. 29, 2018).
- 7           6.       MHA Affordable Housing Production Model Summary (Nov., 2016).
- 8           7.       SDCI Permit Data Warehouse Urban Center/Village Growth Reports
- 9           8.       Seattle Dept. of Construction and Inspections, Tip 257.
- 10          9.       City of Seattle online Interactive Zoning Maps for MHA changes.
- 11          10.       Zoning maps showing current zoning and zoning maps showing proposed MHA  
12 proposal zoning in the areas that are impacted by the MHA proposal.
- 13          11.       Seattle Office of the City Auditor, Audit of Seattle's Incentive Zoning for Affordable  
14 Housing (April 13, 2017).
- 15          12.       FEIS for the Seattle Comprehensive Plan Update (May 5, 2016).
- 16          13.       City of Seattle Uptown Urban Center Rezone FEIS (March, 2017).
- 17          14.       City of Seattle FEIS for the U District Urban Design Alternatives (Jan. 8, 2015).
- 18          15.       Excerpts from Swedish Cherry Hill Medical Center Major Institution Master Plan  
19 FEIS (Dec. 11, 2014).
- 20          16.       Letter from Eugenia Woo, Historic Seattle, to Sam Assefa, OPCD, dated June 30,  
21 2017.
- 22          17.       Jeff Richardson's Curriculum Vitae.
- 23          18.       Michael Oxman's Curriculum Vitae.
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- 1 19. Eugenia Woo’s Curriculum Vitae.
- 2 20. William Reid’s Curriculum Vitae.
- 3 21. Peter Steinbrueck’s Curriculum Vitae.
- 4 22. Spencer Howard’s Curriculum Vitae.
- 5 23. Thomas Veith’s Curriculum Vitae.
- 6 24. Lawrence Kreisman’s Curriculum Vitae.
- 7 25. Davidya Kasperzyk’s Curriculum Vitae.
- 8 26. Map showing National Register of Historic Places, Washington Heritage Register, and
- 9 City of Seattle individually listed properties and historic districts.
- 10
- 11 27. Map showing age-based eligibility (25-years or older) data for properties within the
- 12 City.
- 13
- 14 28. Map showing surveyor National Register of Historic Places eligibility
- 15 recommendations.
- 16 29. *Seattle 2035 Urban Village Study Final Report*, Steinbrueck Urban Strategies.
- 17 (August, 2015).
- 18 30. Records and maps showing buildings and parcels by year built in areas impacted by
- 19 the MHA proposal.
- 20
- 21 31. Map of redevelopable parcels that have potential landmarks on them in different
- 22 neighborhoods affected by the MHA proposal.
- 23 32. Graphics and photographic depictions of current tree canopy; environmental
- 24 resources; historic resources; aesthetics; height, bulk, and scale; transportation and parking in different
- 25 individual neighborhoods that will be impacted by the MHA proposal.
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1           33.     Graphics and photographic renderings of tree canopy; environmental resources;  
2 historic resources; aesthetics; height, bulk, and scale; transportation and parking impacts that will  
3 occur in individual neighborhoods as a result of the MHA proposal.

4           34.     Crown Hill Ballard Open Space and Recreation Plan, with associated documents,  
5 maps and tables (October, 1997).

6           35.     Ortho-Photo Series of Ballard Hub Urban Village, showing baseline change over time  
7 (1904, 1937, 1968, and 2015).

8           36.     Mapping Historic Ballard (MHB) Project, with associated documents, surveys and  
9 maps (February - March 2016).

10          37.     Comments on DEIS Analysis Section 3.3 Aesthetics, West Seattle Junction Urban  
11 Village.

12          38.     Kinkol, Jonathan, *Urban Grain: Fostering social and economic diversity through*  
13 *parcelization of large urban development sites.* (2015).

14          39.     Seattle City Council Resolution 31762 (Aug. 7, 2017), Proposed Amendments 1, 2  
15 and 3, Summary and Fiscal Note.

16          40.     Memo from Sam Assefa, OPCD Director, to City Council PLUZ Committee (July 10,  
17 2017).

18          41.     Letter from Christine M. Tobin-Presser to OPCD Director Samuel Assefa dated Jan.  
19 31, 2018 (with enclosures).

20          42.     Memo to Seattle City Council PLUZ Committee from Central Staff regarding  
21 Comprehensive Plan Amendments (July 31, 2017).

22          43.     Memo to Seattle City Council PLUZ Committee from Central Staff regarding  
23 Comprehensive Plan Amendments (July 20, 2017).

1           44.     City of Seattle 2017 Comprehensive Plan Amendment Applications (with  
2 attachments) of Wallingford Community Council, Janine Rees, the Morgan Community Association,  
3 City Neighborhood Council, Neighborhood Planning and Land Use Committee (CNC). Lee Raaen  
4 for CNC-NPLUC Wallingford Chamber of Commerce and Wallingford Community Council, Jeffrey  
5 Hummel, Ian Morrison on behalf of Fiorito Family, MoxBay LLC, Ian Morrison, Gregory Hill,  
6 Jimmy Blais, Chris Leman, and Seattle Pacific University.

8           45.     Discussion regarding Comprehensive Plan Amendments to Neighborhood Plans.

9           46.     Comprehensive Plan Amendments Meeting in a Box Flyer.

10          47.     Open House to Discuss Comprehensive Plan Amendments and ADUs Flyer.

11          48.     Mayor Burgess's Executive order 2017-11: Tree Protection.

12          49.     Letter from Urban Forestry Commission to Mayor and City Council recommending  
13 tracking tree loss during development (June 24, 2015).

14          50.     Urban Forestry Commission letter on MHA draft EIS recommending setting up a  
15 system to replace trees on or off site or pay a fee in lieu to replace trees (August 2, 2017).

16          51.     Letter from Fred Podesta to Councilmember Tim Burgess (June 30, 2016), with  
17 enclosed Response to Statement of Legislative Intent (SLI) 75-1-A-2 on Natural Capital.

18          52.     SDCI draft Director's Rule 21-2017 – Calculating Tree Valuations and Civil  
19 Penalties for Tree Protection: Tree Preservation.  
20

21          53.     SDCI- Enforcement Tree Preservation – slide presentation to UFC on Dec 13, 2017  
22 by Faith Lundstrom.  
23

24          54.     Presentation on Tree Regulations Research Project and Mayor's Executive order  
25 given to Seattle Urban Forestry Commission on Nov 1, 2017.  
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- 1           55.     Digital recording of presentation by SDCI on Nov 1, 2017 to Seattle Urban Forestry  
2 Commission – approximately 1<sup>st</sup> hour of meeting.
- 3           56.     Tree Regulations Research Report Phase 1 Final Report (Sept 26, 2016).
- 4           57.     Tree Regulations Research Project – Phase II Final report (March 31, 2017).
- 5           58.     Tree Regulations Research Project Phase II – slide presentation (March 27, 2017).
- 6           59.     Seattle 2016 LiDAR Canopy Cover Assessment – slide presentation (May 8, 2017).
- 7           60.     2016 Seattle Tree Canopy Assessment – Executive Summary.
- 8           61.     Seattle 2016 LiDAR Canopy Cover Assessment webinar (May 8, 2017).
- 9           62.     Seth Amrhein letter to Sandra Pinto de Bader (Nov 26, 2016).
- 10          63.     2016 Tree Canopy Assessment letter - CM Bagshaw briefing (June 7, 2017).
- 11          64.     Excerpts from *A Preliminary Sketch of Wallingford's History: 1855 – 1985* (Tom  
12 Veith, Wallingford Heritage Project).
- 13          65.     Excerpts from *Seattle's Beacon Hill by Frederica Merrell and Mira Latoszek* (Arcadia  
14 Publishing Books, 2003) (Excerpts).
- 15          66.     Excerpts from *Seattle's Fremont, Helen Divjak* (Arcadia Publishing 2006).
- 16          67.     Excerpts from *Rainier Valley, by Rainier Valley Historical Society* (Arcadia  
17 Publishing 2012).
- 18          68.     City of Seattle DNS for adoption of rezone and land use code amendments in the  
19 Ballard Urban Hub Village.
- 20          69.     Ballard Rezone and Development Standards Director's Report (Apr. 29, 2016).
- 21          70.     Ballard Rezone and Development Standards (Aug. 16, 2016).
- 22          71.     Council Bill 118693, Summary and Fiscal Note, and Exhibit A – Ballard Rezone Map.
- 23          72.     Ordinance 125125.
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- 1           73.     Design Impact Analysis, Siena Condominium (Oct. 5, 2016).
- 2           74.     Elevations showing current massing and revised for proposed massing of new projects
- 3 within the study area up to six blocks each.
- 4           75.     Territorial and distant views showing current views and revised views including
- 5 proposed massing of new projects within the study area.
- 6           76.     Sections indicating the relative heights and spacing of current and future proposed
- 7 massing.
- 8           77.     Sections of past, present and proposed building massing illustrating the proximate
- 9 relations of adjacent structures.
- 10           78.     Lower Duwamish Waterway Source Control DOE flyer.
- 11           79.     Plat Maps near Duwamish Waterway.
- 12           80.     Duwamish Valley Cumulative Health Impacts Analysis: Community Fact Sheet.
- 13           81.     History of South Park by Thomas Veith (2009).
- 14           82.     Letter from Sam Assefa to Duwamish Valley Neighborhood Preservation Coalition
- 15 dated June 20, 2017.
- 16           83.     Mandatory Housing Affordability EIS Scoping Summary (November 9, 2016).
- 17           84.     Exhibits that are identified by other parties in this matter.
- 18           85.     Appellant intends to rely on and submit either portions of or the entire City of Seattle
- 19 Comprehensive Plan (both past versions and current Seattle 2035 Plan), the City’s Neighborhood
- 20 Plans (both past versions and current versions) and the City and neighborhood design guidelines.
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In addition to the exhibits identified above, appellant reserves the right to introduce exhibits identified by any other party, to introduce additional exhibits as allowed by the City of Seattle Hearing Examiner Rules, and to introduce additional exhibits during cross-examination or rebuttal.

Dated this 2nd day of April, 2018.

Respectfully submitted,

BRICKLIN & NEWMAN, LLP

By: 

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