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BEFORE THE HEARING EXAMINER  
FOR THE CITY OF SEATTLE

In the Matter of the Appeals of	)	Hearing Examiner File:
	)	W-17-006 through W-17-014
WALLINGFORD COMMUNITY	)	
COUNCIL, ET AL.	)	
	)	SENIORS UNITED FOR NEIGHBORHOODS
Of Adequacy of FEIS Issued by the	)	W-17-011
Director, Office of Planning and	)	
Community Development	)	PRELIMINARY WITNESS AND EXHIBIT LIST
_____	)	

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 certificate of Service attached hereto

Pursuant to the Second Prehearing Order, Appellant Seniors United For Neighborhoods (SUN) 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, other than some, but not all, document requests among the documents. Nor has the Respondent answered the interrogatory requests from other Appellants in this appeal. Accordingly, the Appellant does not know whether any of the exhibits listed below will actually be necessary at the hearing. Additionally, since the Respondent has not answered the Appellants' interrogatories, it is impossible to know whether there will be

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

10 Additionally, the Appellant reserves the right (a) to call any witness identified by any  
11 party, (b) to use any of the documents identified by any other party, (c) to call substitute  
12 witnesses if any identified witness becomes unavailable, (d) to call rebuttal witnesses, (e) to call  
13 additional witnesses as allowed by Seattle Hearing Examiner Rules, and. (f) to supplement this  
14 preliminary witness and document list as new or more information becomes available.

15 Time period for each witness's testimony per Hearing Examiner's Order. While SUN  
16 does not have any preliminary witnesses at this time, when we do provide those witnesses, the  
17 approximate time periods for each witness's direct testimony (in parentheses at the end of each  
18 witness summary) will not include time to authenticate documents, argument about the  
19 admissibility of documents if the Respondent will not stipulate to admission of the document(s),  
20 nor time for cross examination and re-direct testimony.

## 21 APPELLANT SENIORS UNITED FOR NEIGHBORHOOD'S PRELIMINARY EXHIBIT LIST

22 1. Respondents answers to Appellant Seniors United For Neighborhoods (SUN) Request for  
23 Admission and 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, reports, memoranda, PowerPoint  
3 presentations, emails, spreadsheets, and the masters thesis City for All.
- 4 3. Impacts of Upzoning on Housing Affordability in the University District. Seattle  
5 Displacement Coalition. April 6, 2015.
- 6 4. Growth and Equity: Analyzing Impacts on Displacement and Opportunity Related to Seattle's  
7 Growth Strategy. City of Seattle, May 2015.
- 8 5. The U District's getting a makeover. Article by Knute Berger. Crosscut, May 27, 2014.
- 9 6. Appendix C: U District Urban Design Displacement Report. October 7, 2016.
- 10 7. U District Urban Design Framework, Support Analysis Memo, Heartland LLC, June 2013.
- 11 8. University District Map of Developable Properties. [Graphic shows the combination of  
12 properties that are likely to be redeveloped as shown in documents 6 and 7 above. Compiled by  
13 John Fox]
- 14 9. Why is Seattle Mayor Jenny Durkan eyeing budget cuts in a boom? Daniel Beekman, Seattle  
15 Times, March 19, 2018.
- 16 10. A city of riches? Most Seattle filers make less than \$50K, IRS data show. Gene Balk/FYI  
17 Guy, Seattle Times, August 30, 2017.
- 18 11. Here's why I-5 is such a mess in Seattle area, and what keeps us moving at all. David  
19 Gutman, Seattle Times, June 19, 2017
- 20 12. Case Studies on Gentrification and Displacement in the San Francisco Bay Area. Center for  
21 Community Innovation, UC Berkeley; Miriam Zuk, Karen Chapple, July 2015.
- 22 13. Final Environmental Impact Statement (FEIS), Transportation Technical Report, Sound  
23 Transit, November 1999.
- 24 14. The Hidden Density of Older Buildings. Mike Powe. National Trust for Historic  
25 Preservation, Preservation Leadership Forum, April 18, 2017

- 1 15. How King County's revenue falls behind even as property taxes go up. Video of King  
2 County Budget Director Dwight Dively.
- 3 16. Seattle No. 7 on list of cities with worst traffic in U.S. Joan Lowy, Seattle Times, August 25,  
4 2015.
- 5 17. Study: Traffic in Seattle still horrible, ranks 2nd-worst in U.S. for evening rush hour  
6 congestion. Taylor Soper, GeekWire, March 22, 2016.
- 7 18. L.A. keeps building near freeways, even though living there makes people sick. Tony  
8 Barboza and Jon Schleuss, LA Times, March 2, 2017.
- 9 19. Seattle's mega-commuters: We spend more time than ever traveling to work. Gene Balk/FYI  
10 Guy, Seattle Times, June 16, 2017.
- 11 20. Things to know about Trump's rollback of CAFE fuel-economy standards. CBS/AP, March  
12 16, 2017.
- 13 21. Moving Toward Age-Friendly Housing in King County. Metropolitan Center for Applied  
14 Research and Extension. January 2018.
- 15 22. Bucking the luxury housing trend, \$500M in new apartments designed to help Seattle's  
16 shrinking middle class. Mike Rosenberg, Seattle Times, June 10, 2017.
- 17 23. SMC 11.16.20: Street Curb Utilization Ordinance.
- 18 24. Email correspondence with MaryCathrine Snyder about providing curb space utilization  
19 throughout the City. Subject Line: Seattle Parking Map, begun with Dawn Schellenberg on  
20 2/28/17, continued with Ms. Snyder on 3/1/17.
- 21 25. DR004 Vehicle Registration by Address in Seattle.xlsx. Provided by Washington state  
22 Department of Licensing, March 21, 2018
- 23 26. MHA FEIS Parking Mitigation, by Ira Appelman. Original draft February 12, 2018.
- 24 27. One-third of Seattle drivers 'cruising' for parking, rides, study finds. Ryan Takeo, KING,  
25 August 18, 2017.
28. Parking in Seattle—5<sup>th</sup> Worst in US. Seattle Times, July 12, 2017.

- 1 29. Parking Inventory. Puget Sound Regional Council, May 5, 2016.
- 2 30. Responses to Eastside Transportation Partnership Questions. July 22, 2016.
- 3 31. Final Tax Reform Bill Would Reduce Affordable Rental Housing Production by Nearly
- 4 235,000 Homes. Tax Reform Resource Center, December 19, 2017.
- 5 32. Here's why I-5 is such a mess in Seattle area, and what keeps us moving at all. David
- 6 Gutman, Seattle Times, June 19, 2017.
- 7 34. U District Small Business Vulnerability Study Final. Steinbreuck Urban Strategies,
- 8 December 2017.

9  
10 Dated: April 2, 2018

11 By: \_\_\_\_\_  
12 David Ward  
13 Authorized Representative for Appellant  
14 Seniors United For Neighborhoods  
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CERTIFICATE OF SERVICE

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:  
Beacon Hill Council [mira.latoszek@gmail.com](mailto:mira.latoszek@gmail.com); Fremont Neighborhood Council [toby@louploop.net](mailto:toby@louploop.net); Friends of North Rainier [masteinhoff@gmail.com](mailto:masteinhoff@gmail.com); Friends of Ravenna Cowen [jebendich@comcast.net](mailto:jebendich@comcast.net); MHAEIS [MHAEIS@seattle.gov](mailto:MHAEIS@seattle.gov); Daniel B Mitchell [Daniel.Mitchell@seattle.gov](mailto:Daniel.Mitchell@seattle.gov); Geoffrey Wentlandt [Geoffrey.Wentlandt@seattle.gov](mailto:Geoffrey.Wentlandt@seattle.gov); Jeff S Weber [Jeff.Weber@seattle.gov](mailto:Jeff.Weber@seattle.gov); Tadas Kiselius [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 [dnj@vnf.com](mailto:dnj@vnf.com); Clara Park [cpark@vnf.com](mailto:cpark@vnf.com); Morgan Community Association (MoCA) [dbj124@earthlink.net](mailto:dbj124@earthlink.net); Seattle Coalition for Affordability Livability & Equity [newman@bnd-law.com](mailto:newman@bnd-law.com); Wallingford CC [lee@lraaen.com](mailto:lee@lraaen.com); West Seattle Junction [rkoehler@cool-studio.net](mailto:rkoehler@cool-studio.net); West Seattle Junction [admin@wsjuno.org](mailto:admin@wsjuno.org).

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

Dated: April 2, 2018 at Seattle, Washington.

By: \_\_\_\_\_  
David Ward, Declarant