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8 CITY OF REDMOND
9 OFFICE OF THE HEARING EXAMINER

10 In the Matter of the Appeal of:

11 JAMES JORDAN,

12 Appellant.

SEPA Appeal No. SEPA-2019-01173
Dept. File No. LAND-2021-00035

13 **APPLICANT'S LIST OF**
14 **WITNESSES AND EXHIBITS**

15 Cascadia School ("**Applicant**") discloses the following individuals as potential witnesses
16 and identifies the following documents as potential exhibits at the hearing in this matter:

17 **I. WITNESS LIST**

18 1. **Philip Keeton.** Mr. Keeton is the Head of Strategy & Operations at Cascadia
19 School. He is expected to testify generally about the scope of the project at issue.

20 2. **Teri Keeton.** Mrs. Keeton is the Head of School at Cascadia School. She is
21 expected to testify about the School's objectives in undertaking the project and regarding public
22 notices of the City's SEPA Determination.

23 3. **Amy Wasserman.** Ms. Wasserman is a Senior Project Manager with TENW. The
24 Applicant engaged TENW to provide traffic and parking analysis services in support of the
25 Conditional Use Permit application at issue. Ms. Wasserman prepared the Traffic Study and the
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1 Transportation Management Program for the proposed project. Ms. Wasserman is expected to
2 provide expert testimony regarding the proposed project's impacts on traffic and parking.

3 4. **Kevin Flanagan or Ann Vacek.** Mr. Flanagan is a Managing Principal with NAC
4 Architecture. Ms. Vacek is an Architect with NAC Architecture. The Applicant engaged NAC
5 Architecture to design the project. Mr. Flanagan or Ms. Vacek are expected to provide expert
6 testimony regarding the size, scope, design, and location of the project relative to critical areas
7 and lands covered by water, location of parking and vehicle and pedestrian circulation design.

8 5. **Benjamin Sticka.** Mr. Sticka is a Planner with the City of Redmond. Mr. Sticka is
9 expected to provide testimony regarding the City's decision to make a threshold determination in
10 this case and ultimately to issue a Determination of Non-Significance.

11 **II. EXHIBITS**

- 12 1. Updated Phase 1 Traffic Study, by Amy Wasserman, dated December 1, 2020.
- 13 2. Transportation Management Plan for Cascadia School, by Amy Wasserman
14 (undated).
- 15 3. Cascadia Montessori School East Building Remodel and Addition, Draft Plan Set,
16 by NAC Architecture, dated June 14, 2019.
- 17 4. Stormwater Management Report, by Jacobson Consulting Engineers, dated
18 October 23, 2020.
- 19 5. Wetland and Stream Delineation report, by The Watershed Company, dated
20 December 1, 2020.
- 21 6. Arborist Report, by Davey Resource Group, dated December 2020.
- 22 7. SEPA Determination of Non-Significance, by the City, issued December 18, 2020.
- 23 8. Consolidated Type III/Conditional Use Permit and Site Plan; Entitlement/Technical
24 Committee Report to the Hearing Examiner (undated).
- 25 9. Photograph of posted notices of the City's SEPA Determination, taken Teri Keeton
26 on December 18, 2020.

1 10. E-mail correspondence between Philip Keeton and Benjamin Sticka regarding the
2 posting of a notice of the City's SEPA Determination, dated December 18, 2020.

3 11. Resumes for the above-identified individuals expected to offer expert testimony.

4 **III. RESERVATION OF RIGHTS**

5 The Applicant reserves the right to call as a witness in its own case any person identified
6 by the appellant, James Jordan, or the City of Redmond. The Applicant also reserves the right to
7 offer into the record any document identified by Mr. Jordan or the City of Redmond as a potential
8 exhibit.

9 DATED this 11th day of March, 2021.

10 HILLIS CLARK MARTIN & PETERSON P.S.

11
12 By 

Amit D. Ranade, WSBA #34878

Ann M. Gygi, WSBA #19912

Attorneys for Applicant Cascadia Montessori School

1 **CERTIFICATE OF SERVICE**

2 I certify that on this date, I filed the Applicant’s List Of Witnesses and Exhibits with the
3 Redmond Hearing Examiner via e-mail to Kalli Biegel, Deputy City Clerk, at
4 kbiegel@redmond.gov.

5 DATED this 11th day of March, 2021.

6 *s/ Krista M. Stokes*
7 _____
8 KRISTA STOKES

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12 ND: 23218.002 4823-7477-9872v2