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BEFORE THE HEARING EXAMINER
FOR THE CITY OF REDMOND

In the Matter of the Appeal of

No. DEVREQ-2017-00464/BLDG-2015-02128

Tom and Andrea Short and Hamid
Korasani

**APPELLANTS' WITNESS
& EXHIBIT LIST**

of a May 18, 2017 Decision by the
Technical Committee to Deny a
Deviation Request for a project at
13404 NE 100th Street, Redmond

The Appellants, Tom & Andrea Short, and Hamid Korasani, submit the following
Witness and Exhibit List per the Order Setting Pre-Hearing Document Exchange Schedule,
dated June 13, 2017:

POTENTIAL WITNESSES

1. **Hamid Korasani, PE/Appellant/Applicant:** Mr. Korasani is a civil engineer
with SAZEI Design Group, LLC that has been licensed in the State of Washington since 1988
(license no. 25408). Mr. Korasani is the engineer and applicant for the underlying project. He
is familiar with all aspects of the exemption/deviation request and the underlying project and is
expected to testify accordingly. Specifically, he is expected to testify regarding the subject
property and the vicinity, the underlying project and its associated costs, the deviation request,
grounds/elements for seeking an exemption and/or deviation from the undergrounding of

1 overhead utilities, applicable regulations and comprehensive plan provisions, and the City's
2 recent approval of an adjoining project that added a utility pole to the frontage on the subject
3 property's right-of-way frontage, etc.

4 2. **James Jordan, Project Manager for Applicants/Appellants:** Mr. Jordan is
5 the project manager for the Applicant's underlying project. He has over 35 years of experience
6 in the land use development industry, as a land use consultant, developer, and builder,
7 including many projects requiring the installation and/or relocation of utilities. He is expected
8 to testify regarding the underlying project and its associated costs, the deviation request,
9 grounds/elements for seeking an exemption and/or deviation from the undergrounding of
10 overhead utilities, applicable regulations and comprehensive plan provisions, and the City's
11 recent approval of an adjoining project that added a utility pole to the frontage on the subject
12 property's right-of-way frontage, etc.

13 3. **Andrea Short, Appellant/Applicant:** Mrs. Short is an Applicant for the
14 underlying project and owner of the subject property. She is expected to testify regarding her
15 ownership of the subject property and the vicinity, the underlying project and its cost, seeking
16 an exemption and/or deviation from the undergrounding of overhead utilities, including the
17 disparate financial impact of any requirement to underground existing utilities.

18 4. **Tom Short, Appellant/Applicant:** Mr. Short is an Applicant for the underlying
19 project and owner of the subject property. He is expected to testify regarding her ownership of
20 the subject property and the vicinity, the underlying project and its cost, seeking an exemption
21 and/or deviation from the undergrounding of overhead utilities, including the disparate
22 financial impact of any requirement to underground existing utilities.

1 5. **Mike Johnson, PE:** Mr. Johnson is the civil engineer with Puget Sound Energy
2 who corresponded with Mr. Korasani regarding what would be required to successfully
3 underground the existing overhead utilities that serve the subject property. If he is amenable,
4 he is expected to testify regarding PSE's requirements for undergrounding existing overhead
5 utilities for the subject property.

6 6. **Paulette Norman, PE:** Ms. Norman is the City of Redmond, Development
7 Engineering Manager that issued the first exemption/deviation denial, dated March 3, 2017.
8 She is also a civil engineer that has been licensed in the State of Washington since 1992
9 (license no. 29116). The Appellants would like to examine Ms. Norman regarding the basis of
10 her decision, the interpretation/application of City regulations, and the City's past pattern and
11 practices with respect to considering and reviewing deviation requests for the undergrounding
12 of overhead utilities, and her decision regarding the exemption/deviation request.

13 7. **Lisa Rigg, PE:** Ms. Rigg is the City of Redmond, Development Engineering
14 Manager that issued the second exemption/deviation denial, dated May 18, 2017. She is also a
15 civil engineer that has been licensed in the State of Washington since 1996 (license no. 33236).
16 The Appellants would like to examine Ms. Rigg regarding the basis of her decision, the
17 interpretation/application of City regulations, and the City's past pattern and practices with
18 respect to considering and reviewing deviation requests for the undergrounding of overhead
19 utilities.

20 8. **Cameron A. Zapata:** Ms. Zapata is the City of Redmond Planner assigned to
21 the underlying project and deviation. The Appellants would like to examine Ms. Zapata
22
23

1 3. City of Redmond, permit file for BPLN 2015-02128 (various dates). This file
2 constitutes the underlying building permit associated with the exemption/deviation request for
this matter;

3 4. Procedures for Requesting and Approving Engineering Deviation Requests
4 (Dec. 14, 2016);

5 5. Parcel Data, King County Department of Assessments, Parcel No. 1246700231
6 (July 2017). This document constitutes the County's Assessor data for the subject property
7 (*i.e.*, 13404 NE 100th St., Redmond, WA 98033);

8 6. Parcel Map, King County Department of Assessments, Parcel No. 1246700231
9 (updated March 2017). This document constitutes the County's Assessor map for the subject
10 property and vicinity;

11 7. Parcel Map, King County Department of Assessments, Parcel No. 1246700231
12 and vicinity (retrieved July 2017). This document constitutes the County's Assessor map for
13 the subject property and vicinity with an aerial photo overlay;

14 8. Chapter 21.17 Redmond Zoning Code, Adequate Public Facilities and
15 Undergrounding of Utilities (effective September 15, 2012). This document speaks for itself.;

16 9. Redmond Zoning Code 21.08.070, (Residential Innovative) Single-Family
17 Urban Residential (effective October 26, 2013). This document speaks for itself.;

18 10. Redmond Zoning Code 21.08.360, Residential Innovative Zone (effective
19 October 26, 2013). This document speaks for itself.

20 11. City of Redmond Ordinance, 2662 (effective Sept. 15, 2012). This document is
21 the ordinance that is codified in chapter 21.17 RZC.

22 12. Photo of subject property, taken by counsel for Appellants (July 2017). This
23 photo depicts the subject property from NE 100th Street;

 13. Photo of subject property, taken by counsel for Appellants (July 2017). This
photo depicts the subject property and street from NE 100th Street;

 14. Photo of subject property, taken by counsel for Appellants (July 2017). This
photo depicts the subject property from 134th Avenue NE;

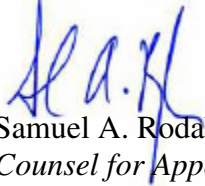
 15. Photo of subject property, taken by counsel for Appellants (July 2017). This
photo depicts the subject property and street from 134th Avenue NE;

RESERVATION OF RIGHTS

The Appellants reserve the right to call as witnesses any lay or expert witnesses disclosed by the City. The Appellants further reserve the right to use as exhibits, any exhibits disclosed by any of the City and to add supplemental exhibits as may be necessary to pursue the appeal.

DATED this 7th day of July, 2017.

LAW OFFICE OF SAMUEL A. RODABOUGH PLLC



Samuel A. Rodabough
Counsel for Appellants

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